

Representation

Draft Modification Report

0470 - Notification of Minimal Safety operating gas needs of large customers

Consultation close out date: 04 April 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd
Representative: Steven J Edwards
Date of Representation: 4th April 2014

Do you support or oppose implementation?

Not Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We agree with the stated intention of this Proposal which is to “allow large customers to indicate to transporters at any particular sites needs that a customer has to ensure the integrity of their plant during a localised supply constraint”. We also acknowledge the positive engagement from the proposer to amend the proposal through work group discussions. That said, we think the objectives can be met without an application process and also that an application process could set an expectation that could not be fulfilled.

Modification Panel Members have indicated that it would be particularly helpful if the following questions could be addressed in responses:

Q1: Do you consider that this change will have a material impact on either your business or competition in shipping, transportation or supply of gas, and if so, what?

The application process would add administrative costs and may also introduce a level of expectation that could not be met. This mod could also adversely impact the load shedding process.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No; and we recognise the efforts of the proposer during this modification to amend the proposal to reflect feedback.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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20 March 2014

Version 1.0

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Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

We would need to amend our load shedding process and also be required to run an application process as well as maintenance of an additional register.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes this is fine

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

The views of the National Emergency Co-ordinator – an independent body who have obligations in a Gas Supply emergency are important in the development of this Modification.