

## **Representation For. 0022**

"Revision to Section O - Removal of references to the Base Plan Assumptions Document"  
Version 1.0

**Date of Communication:** 19/07/2005  
**External Contact:** Steve Featherstone (Scotia Gas Networks)  
**Slant:** Comments  
**Strictly Confidential:** No

### **Abstract**

Julian Majdanski  
Joint Office of Gas Transporters

Dear Julian

Re: Draft modification report 0022: Revisions to Section O - Removal of References to the Base Plan Assumptions Document

Thank you for providing Scotia Gas Networks (SGN) with the opportunity to comment on the above draft modification report. Please accept my apologies for the slightly late submission of our response, which is due to the volume of UNC modification proposals in progress which have been requiring attention. I hope, however, that our comments can be taken into consideration and incorporated into the final modification report.

SGN offers qualified support for this proposal.

We note that the TBE process has replaced the Base Plan Assumptions (BPA) process in recent years and therefore it would seem straightforward enough to remove references to the BPA in the UNC to make the terminology consistent with what happens in practice. We therefore have no objection to this aspect of the proposal.

We do however have a concern that the draft modification report is unclear and does not seem to take account of the licence obligations that apply to Transporters in respect of producing a long-term development statement. We believe that it would have been helpful as part of the consultation for the report to have made reference to and explained how the UNC process fits with the relevant licence obligations on the NTS and DNs respectively to produce their long-term development statements. For example, our interpretation of the UNC provisions suggests that the TBE process is the mechanism by which information is gathered by NTS and that the provision of information by Users to DNs is currently piggybacking on that process. In addition it would appear that Users will be required to provide several streams of information to NTS via the TBE process and to the four DNs, pursuant to TPD O.3.2.

Furthermore, we are unclear how the proposed change in timetable for initiating the TBE process, by moving from October to January fits with existing provisions in Section H of the OAD which is supposed to facilitate the production of the TPD Section O requirements.

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In our view this proposal, as well as the more recent proposal 0038, to be considered by the UNC Modification Panel later in the week, serve to illustrate the need for a review of the planning process from end to end, to ensure that the timetables fit together and that the UNC adequately reflects the Transporters' respective licence obligations.

We hope to see further clarification on the points we have raised in the final modification report. Please contact me in the first instance should you wish to discuss them in more detail.

Yours sincerely

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