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Modification Panel Secretary  
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Dear Julian

**Modification Proposal 0207: Change to Telemetry Requirements in OAD for SOMSA Exit**

Thank you for the opportunity to comment on this Modification Proposal. Scotia Gas Networks gives its qualified support for implementation of this Modification Proposal. SGN agrees with the principle behind this proposal but has a number of comments that we would like to make in relation to the Proposal and have some concerns regarding the suggested legal text which was made available yesterday.

The Proposer suggests the proposal is required to facilitate exit from the System Operator Managed Services Agreement (SOMSA) put in place at the time of DN sale. Following SOMSA exit, the Transitional Provisions in OAD Section E 3.1 will no longer apply. National Grid NTS will no longer have a right of access to and right of use of DNO Telemetry at each Offtake. NTS would be required to provide its own NTS Telemetry Facilities. Also as part of this phased programme of work, Distribution Network Operators are due to take control of their own control rooms using their own Supervisor Control And Data Acquisition (SCADA) systems. Whilst SGN agrees with the Proposer that it would more economical and efficient for NTS to continue to have access to information provided from existing DNO telemetry equipment, until such time as it is replaced, it is important that obligations and timescales are clear:

- It should be clear in the legal text that obligations to continue to provide information should be on a like for like basis i.e. DNOs would only be obliged to continue to provide information as currently received by NTS. There would be no obligations to provide any new information or functionality as this would be inappropriate and was not part of the Modification Proposal.
- There are a number of circumstances under which DNO equipment referred to in the proposal would be replaced in future. The most likely scenario is where equipment and technology is old or obsolete and requires to be replaced e.g. where spare parts are no longer available. Some equipment is already approaching this stage. However there may also be occasions where DNOs would choose to replace equipment before this point e.g. if modifying the offtake, if new functionality is required, if upgrading systems or if it would be more economic to do so. Our interpretation of the Modification Proposal was that "end of service life" includes economic, operational and physical considerations. However the suggested legal text appears to be more restrictive. We believe

clarification as detailed above is required as it would be inappropriate to restrict a DNOs operational or commercial discretion following SOMSA exit.

- Whilst SGN is willing to effectively extend Transitional Provisions in the UNC, the duration of these arrangements should be in accordance with our interpretation of the service life and at the DNOs discretion. The obligation to agree a date with National Grid NTS as proposed in 2.3.5 (C) is entirely inappropriate. It was not envisaged under existing UNC arrangements and was not indicated in the Modification Proposal. We believe the words 2.3.5(c) should be replaced with "on such date as otherwise notified by the DNO".
- It is our understanding that any equipment installed by National Grid NTS in future would need to comply with the obligations set out in the UNC OAD Section B e.g. regarding alteration, replacement, relocation or addition of connection Facilities and compatibility. It is also SGN's understanding that any plan on our part to alter, replace, relocate or add to Connection Facilities would also be covered by UNC OAD Section B. In which case DNOs would be required to give at least 12 months notice of any works (unless a shorter period is agreed with National Grid NTS).

In summary SGN believes that subject to confirmation of the above points, and clarification through amendments to legal text, implementation of the above Modification Proposal could better facilitate relevant objective A11.1 (a), the efficient and economic operation of the pipeline system by allowing National Grid NTS to progress with a phased programme for installation of telemetry and control systems. As such SGN gives qualified support to implementation of the proposal.

We hope you find these comments helpful.

Yours sincerely

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