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Modification Panel Secretary  
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Dear John

**Re: Modification Proposal 0250 Introduction of Code Contingency Guidelines.**

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal. SGN supports implementation of this Modification Proposal.

Modification Proposal 0250 has been raised due to the recommendations made in Review Group 0217: Gemini Code Contingency Arrangements. The Gemini failure in October 2007 highlighted to the industry the importance of having clear, accessible, well understood and tested contingency arrangements that reflect the differing needs and priorities of Users and Transporters. Therefore the Review Group looked at ways in which improved accessibility and familiarisation of the Code Contingency arrangements could be achieved. Furthermore the Review Group looked at the governance arrangements around the management of Code Contingency procedures, recommending revisions to develop a clear understanding for Users and Transporters of the balance between the risks of a prolonged Code Contingency occurring and the costs of the various contingency options available.

Modification Proposal 0250 introduces Code Contingency Guidelines Documents that contains all the details associated with partial or complete failure of UK Link, it aims to provide the guidelines in an easily accessible source and introduce an appropriate level of testing of the code contingency arrangements. SGN consider by replacing the UK Link Manual contingency documentation with a consolidated Code Contingency Guidelines document it would remove discrepancies and would provide clarity, in a concise and easily accessible format.

SGN has the following comments to make in respect of specific sections of the Draft Modification Report:

**3 Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

**Standard Special Condition A11.1 (a): the efficient and economic operation of the pipe-line system to which this licence relates;**



SGN consider implementation of this proposal may further this relevant objective as it would provide greater clarity to Users and Transporters during Code Contingency events.

**5 The implications for Transporters and each Transporter of implementing the Modification Proposal, including;**

**a) Implications for operation of the System:**

SGN agree with the proposer that implementation of this proposal may improve the operation of the system during a Gemini system failure as it would provide the industry with unambiguous clarity of the Code Communication obligations during a Code Contingency.

**b) Development and capital cost and operating cost implications:**

SGN understand there are no significant costs associated with the implementation of this proposal, the costs associated with the introduction of a testing process which is proposed to be developed and managed by xoserve are expected to be minor.

**7 The development implications and other implications for the UK-Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users.**

This Modification Proposal introduces the Code Contingency Guidelines Document as an annex to the UK Link Manual. Section 3.1 of the guidelines document requires Transporters to participate in a code contingency exercise. As DNOs do not have access to the Gemini system we believe there would be limited involvement by the DNOs during a code contingency exercise. However we consider the guidelines document would have benefited from having a distinction of DNO and NTS processes clearly documented within the guidelines, as such we would hope to see these incorporated in any future amendments which may be considered.

**8 The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk;**

SGN believe by improved accessibility and greater familiarity of the Code Contingency Guidelines and the associated processes and procedures there would an improvement in the operation of the system during a Code Contingency situation which may reduce the level of contractual risk of Users.

**9 The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party**

We recognise there may be some changes required to be made by Users of the UK Link System to ensure contingency procedures mirror the proposed Code Contingency arrangements.

We hope you find these comments helpful.

Yours sincerely

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24 hour gas escape number 0800 111 999\*  
\*Calls will be recorded and may be monitored

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