

**Draft Modification Report**  
**Referencing Incident Notification Governance Within Network Code**  
**Modification Reference Number 0649**  
Version 1.0

This Draft Modification Report is made pursuant to Rule 7.3 of the Modification Rules and follows the format required under Rule 8.9.3.

## **1. The Modification Proposal**

For Transco to provide shipper communications for relevant emergency incidents in accordance with Transco's processes for compliance with the obligations of GS(M)R and Safety Cases.

## **2. Transco's Opinion**

It is Transco's opinion that this Modification Proposal, which has been publicised within the Supply Point and Billing Workstream, should be implemented.

Transco's procedures for the management of the specified emergency incidents are contained in the following documents:

- Network Gas Supply Emergency Transco/E/1
- Local Gas Supply Emergency Transco/E/2, T/PR/E3
- Incident/Accident Reporting and Investigation T/PR/INV1

The above documentation details operational procedures for emergency incidents defined within Gas Safety (Management) Regulations 1996 (GM(S)R) and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). It has become evident that it would be useful to Users in terms of customer and resource management if the communication of some specific incidents were placed on a more formalised basis.

Transco therefore proposes to include within the Network Code reference to externally available documentation which detail Transco's obligations to provide notice to Users of three incident categories identified within GS(M)R and RIDDOR.

In respect of Loss of Supply Incidents, Transco currently provides notice to Users in accordance with internal procedures. The Proposal is to incorporate the shipper communication elements into a new document 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency' procedure. This document (in draft form) states that the initial notice of the incident (where there is, or the potential to affect more than 250 Supply Points) is issued "as soon as is reasonably practical (within 1 hour where possible)". Transco is currently undertaking a comprehensive review of T/PR/E3 in consultation with shippers and other interested parties. One aspect under review is the appropriateness of the 250 Supply Points trigger for the issue of communication to Shippers. Any appropriate changes to the provisions of T/PR/E3 will be reflected in the document 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency'.

In respect of Carbon Monoxide Poisoning Incidents, Transco currently provides notice to the responsible User in accordance with internal procedures. The Proposal is to incorporate the shipper communication elements into a new document 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency' procedure. This document (in draft form) currently states "Transco will forward the appropriate notice to the responsible Shipper. The service level for the notification of CO poisoning incidents to the gas shipper/supplier, and the HSE is within 2 hours of the arrival of a Transco representative at the site of the incident or confirmation to Transco by others that there has been CO poisoning".

In respect of Gas Fire/Explosions, Transco will, from the date of implementation, provide notice to the responsible User in accordance with the new draft procedure 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency'. This document (in draft form) currently states "Where an incident occurs as defined ... Transco will forward the appropriate notice to the responsible shipper. The service level for the notification is within 2 hours of confirmation of the incident as defined".

The proposed reference to be included within the Network Code is therefore to the 'Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency'

Transco believes that the inclusion of the above reference within Network Code would achieve the aim of providing greater confidence for Users in the area of incident notification governance.

### **3. Extent to which the proposed modification would better facilitate the relevant objectives**

Implementation of this Modification Proposal would improve Users' confidence that relevant incident notification will occur in a timely manner. This allows Users to manage their customer relationships appropriately and more effectively. The formalisation of effective communication to Users is consistent with Transco's GT Licence Relevant Objective of the efficient discharge of obligations under the GT Licence and supports the efficient and economic operation of the pipeline system.

### **4. The implications for Transco of implementing the Modification Proposal , including**

#### **a) implications for the operation of the System:**

No implications for the operation of the system have been identified.

#### **b) development and capital cost and operating cost implications:**

No such implications have been identified. Provisional analysis of the additional reporting requirements in the event of gas fire/explosions (based on up to sixty events annually) concluded that this work can be undertaken utilising existing resource levels.

#### **c) extent to which it is appropriate for Transco to recover the costs, and proposal for the most appropriate way for Transco to recover the costs:**

It is anticipated that any costs (based on up to sixty events annually) incurred will not be significant and therefore will be borne by Transco.

**d) analysis of the consequences (if any) this proposal would have on price regulation:**

No such consequences have been identified.

**5. The consequence of implementing the Modification Proposal on the level of contractual risk to Transco under the Network Code as modified by the Modification Proposal**

Implementation of this Modification Proposal would not increase the level of Transco's contractual risk.

**6. The development implications and other implications for computer systems of Transco and related computer systems of Users**

No changes would be required to Transco's UK-Link system to facilitate implementation of this Modification Proposal.

**7. The implications of implementing the Modification Proposal for Users**

No significant implications are anticipated. It is expected that Users would need to ensure effective procedures are established to receive relevant information from Transco.

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

No such implications have been identified.

**9. Consequences on the legislative and regulatory obligations and contractual relationships of Transco and each User and Non-Network Code Party of implementing the Modification Proposal**

No such consequences have been identified.

**10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal**

Advantages:

- Provides clarity with respect to Transco's procedures for advising Users in the event of a relevant emergency incident occurring.

Disadvantages:

No disadvantages have been identified.

**11. Summary of the Representations (to the extent that the import of those representations are not reflected elsewhere in the Modification Report)**

Representations are now sought.

**12. The extent to which the implementation is required to enable Transco to facilitate compliance with safety or other legislation**

Whilst implementation is not required to facilitate such compliance, this Modification Proposal provides clarity within the Network Code with regard to Transco's procedures for notifying Users in the event of a relevant emergency incident occurring.

**13. The extent to which the implementation is required having regard to any proposed change in the methodology established under Standard Condition 4(5) or the statement furnished by Transco under Standard Condition 4(1) of the Licence**

This Modification Proposal is not required to facilitate any such change.

**14. Programme of works required as a consequence of implementing the Modification Proposal**

No programme of works would be required to enable implementation of this Modification Proposal.

**15. Proposed implementation timetable (including timetable for any necessary information systems changes)**

This Modification Proposal may be implemented with immediate effect.

**16. Recommendation concerning the implementation of the Modification Proposal**

Transco recommends that this Modification Proposal be implemented.

**17. Text**

**SECTION V**

Insert a new paragraph 5.11 to read as follows:

“5.11.1 Transco shall, as soon as reasonably practicable after the occurrence of any of the incidents referred to in paragraph 5.11.2 below (subject always to any obligations of confidentiality and to any obligations (whether pursuant to any Legal Requirement or otherwise) which Transco may reasonably determine have a higher priority in the event of an incident) provide to relevant Users such information regarding the incident as is set out in the document entitled ‘Schedule for Shipper Communications in Incidents of CO Poisoning, Gas Fire/ Explosions and Local Gas Supply Emergency’ as such document may from time to time be amended by Transco upon notice to Users (the “**Shipper Incident Communication Procedure**”).

5.11.2 The incidents referred to in paragraph 5.11.1 above are:

- (a) explosions or fires due to an escape of gas;
  - (b) incidents involving death or major injury due to carbon monoxide poisoning from gas; and
  - (c) incidents resulting in a failure to supply more than 250 System Exit Points at any one time,
- in each case as more particularly described and defined in the Shipper Incident Communication Procedure.

***Representations are now sought in respect of this Draft Report and prior to Transco finalising the Report***

Signed for and on behalf of Transco.

Signature:

**Sharon McLaughlin**  
**Customer Services Manager**

**Support Services**

Date: