

CODE MODIFICATION PROPOSAL No xxxx
Rationalisation of Maintenance Planning Dates and Timescales
Version 0.1

Date: 30/09/2008

Proposed Implementation Date: 01 January 2009

Urgency: Non Urgent

1 The Modification Proposal

a) Nature and Purpose of this Proposal

Where capitalised words and phrases are used within this Modification Proposal, those words and phrases shall usually have the meaning given within the Uniform Network Code (unless they are otherwise defined in this Modification Proposal). Key UNC defined terms used in this Modification Proposal are highlighted by an asterisk (*) when first used. This Modification Proposal*, as with all Modification Proposals, should be read in conjunction with the prevailing UNC.

Background

Under the UNC, National Grid NTS* plan maintenance of the NTS* during the Planned Maintenance Period* from April until October in any Gas Year*. National Grid NTS publish two Maintenance Programmes* annually: the April Maintenance Programme* and the October Maintenance Programme*. Both programmes include information provided by Users* on their own maintenance, and both meet preliminary publication dates as defined in the UNC.

The timescales for the Maintenance Programmes are defined in two separate sections of the UNC: Section L of the TPD* and Section G of the OAD*. Some of the dates and time periods specified in these Sections are inconsistent or contradictory, and hence this Modification Proposal proposes to rationalise these two parts of the UNC. The following tables compare the publication dates and timescales required by the two Sections of the UNC:

April Maintenance Publication Dates and Planning Periods		
Draft / Final	OAD	TPD
Draft	30 November (for 24 Months)	-
Draft	01 February (for 24 Months)	01 February (for 24 Months)
Final	15 March (for 24 Months)	01 April (for 24 Months)

October Maintenance Publication Dates and Planning Periods		
Draft / Final	OAD	TPD
Draft	30 June (for 6 Months)	01 September (for 24 Months)
Final	15 September (for 6 Months)	01 October (for 24 Months)

Proposal

It is proposed that the dates and timescales detailed in the TPD are replaced with references to Annex G-2 of the OAD. In addition, as no specific maintenance dates are available or agreed with Users more than a year in advance, it is proposed to reduce the timescales set out in the OAD for the April Maintenance Programme from 24 months to 12 months. Equally, the requirement for the October Maintenance Programme to cover 24 months is inconsistent with its purpose which is to document any planned maintenance that has overrun into the winter from the April Maintenance Programme. It is therefore proposed that the time period for the October Maintenance Programme be reduced to cover the 6 month period following the relevant April Maintenance Programme period.

It is also proposed to remove the requirement on all Transporters* to produce a first draft of the April Maintenance Programme just after the start of the Winter Period*. At this point in time, data on planned maintenance for the following summer is limited to high-level proposals and is subject to a large degree of change, as the data on which it is based will not be able to include the winter performance of the system. We therefore believe that the cost and effort of producing this early draft outweighs any benefit that it may provide.

The proposed changes are detailed in the following tables. For clarity, it is not proposed to change the requirement for DNOs* to produce a draft April Maintenance Programme by 31 December, as this will continue to feed into the National Grid NTS draft April Maintenance Programme published on 01 February of the relevant year.

April Maintenance Publication Dates and Planning Periods	
Draft	01 February (for 12 Months)
Final	01 April (for 12 Months)

October Maintenance Publication Dates and Planning Periods	
Draft	01 September (for 6 Months)
Final	01 October (for 6 Months)

b) Justification for Urgency and recommendation on the procedure and timetable to be followed (if applicable)

The Modification Proposal is non-urgent and therefore it is recommended that the standard timetable is followed.

c) Recommendation on whether this Proposal should proceed to the review procedures, the Development Phase, the Consultation Phase or be referred to a Workstream for discussion.

It is recommended that the Modification Proposal be referred to the Transmission Workstream for discussion prior to consultation.

2 Extent to which implementation of this Modification Proposal would better facilitate the achievement (for the purposes of each Transporter's Licence) of the Relevant Objectives

“(b) the coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters;”

In removing the requirement for Transporters to produce the first drafts of their April Maintenance Programmes before any meaningful data is available, the efficiency of Transporters' maintenance planning activities will be enhanced and industry confusion arising from changing Maintenance Programmes will be minimised.

“(e) the promotion of efficiency in the implementation and administration of the ... uniform network code;”

Harmonising the dates for the public release of maintenance information would facilitate this objective by removing contradictory requirements from the TPD and OAD, thus improving efficiency in the implementation of the UNC.

3 The implications of implementing this Modification Proposal on security of supply, operation of the Total System and industry fragmentation

No such implications have been identified.

4 The implications for Transporters and each Transporter of implementing this Modification Proposal, including:

a) The implications for operation of the System:

This Modification Proposal will enhance the effectiveness of Transporters' maintenance planning activities, and hence improve the efficient operation of the System.

b) The development and capital cost and operating cost implications:

No such implications have been identified.

c) Whether it is appropriate to recover all or any of the costs and, if so, a proposal for the most appropriate way for these costs to be recovered:

No such costs have been identified.

d) The consequence (if any) on the level of contractual risk of each Transporter under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

No such consequences have been identified.

5 The extent to which the implementation is required to enable each Transporter to facilitate compliance with a safety notice from the Health and Safety Executive pursuant to Standard Condition A11 (14) (Transporters Only)

Not applicable.

6 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

No such implications have been identified.

7 The implications for Users of implementing the Modification Proposal, including:

a) The administrative and operational implications (including impact upon manual processes and procedures)

By minimising publication of maintenance data that has a high degree of uncertainty associated with it Users' maintenance plans will be subject to less change, and hence the administrative workload on Users is anticipated to reduce.

b) The development and capital cost and operating cost implications

No such implications have been identified.

c) The consequence (if any) on the level of contractual risk of Users under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

No such consequences have been identified.

8 The implications of the implementation for other relevant persons (including, but without limitation, Users, Connected System Operators, Consumers, Terminal Operators, Storage Operators, Suppliers and producers and, to the extent not so otherwise addressed, any Non-Code Party)

Implementation of this Modification Proposal is anticipated to benefit the wider industry through the reduction of uncertainty surrounding the published Maintenance Programmes and hence increase the efficiency of other parties maintenance planning activities.

9 Consequences on the legislative and regulatory obligations and contractual relationships of the Transporters

This Modification Proposal will align the maintenance planning requirements set out in two Sections of the UNC and hence will clarify the regulatory obligations on the Transporters.

10 Analysis of any advantages or disadvantages of implementation of the Modification Proposal not otherwise identified in paragraphs 2 to 9 above

Advantages

This Modification Proposal will rationalise the publication dates and timescales for the Maintenance Programmes as defined in the TPD and OAD, and will reduce unnecessary duplication and confusion generated by multiple and changing maintenance programmes.

Disadvantages

No disadvantages have been identified.

11 Summary of representations received as a result of consultation by the Proposer (to the extent that the import of those representations are not reflected elsewhere in this Proposal)

None received.

12 Detail of all other representations received and considered by the Proposer

None received.

13 Any other matter the Proposer considers needs to be addressed

Not applicable.

14 Recommendations on the time scale for the implementation of the whole or any part of this Modification Proposal

It is recommended that this Modification Proposal be implemented prior to the publication of the next April Maintenance Programme.

15 Comments on Suggested Text

16 Suggested Text

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document & Offtake Arrangements Document

Section(s) TPD; OADG

Proposer's Representative

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Proposer

National Grid NTS