

0516S:

Information provision by large Customers to aid understanding of site characteristics

01 Modification

02 Workgroup Report

03 Draft Modification Report

04 Final Modification Report

This modification proposes to create a clear process for large gas customers to provide information to the gas transporters for use in emergency plan and constraint management.



Panel consideration is due on 21 May 2015



High Impact:












Medium Impact:



Low Impact:

Daily read Consumers, Gas Transporters, Shippers.

Non-daily read consumers, Transporters' Agent.

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About this document:		 Any questions? Contact: Code Administrator  enquiries@gasgovernance.co.uk  0121 288 2107 Proposer: Robin Johnson  robin.johnson@wingas-uk.com  020 8439 9686 Transporter: Scotia Gas Networks Systems Provider: Xoserve  commercial.enquiries@xoserve.com Additional contacts: Gareth Evans  gareth@waterwye.co.uk  01473 822503 07500 964447														
<p>This Final Modification Report will be presented to the Panel on 21 May 2015. The Panel will consider the views presented and decide whether or not this self-governance change should be made.</p> <p>The Workgroup recommended the following timetable:</p> <table><tr><td>Initial consideration by Workgroup</td><td>23 October 2014</td></tr><tr><td>Amended Modification considered by Workgroup</td><td>22 January 2015</td></tr><tr><td>Workgroup Report presented to Panel</td><td>19 March 2015</td></tr><tr><td>Draft Modification Report issued for consultation</td><td>19 March 2015</td></tr><tr><td>Consultation Close-out for representations</td><td>24 April 2015</td></tr><tr><td>Final Modification Report published for Panel</td><td>28 April 2015</td></tr><tr><td>UNC Modification Panel decision</td><td>21 May 2015</td></tr></table>		Initial consideration by Workgroup	23 October 2014	Amended Modification considered by Workgroup	22 January 2015	Workgroup Report presented to Panel	19 March 2015	Draft Modification Report issued for consultation	19 March 2015	Consultation Close-out for representations	24 April 2015	Final Modification Report published for Panel	28 April 2015	UNC Modification Panel decision	21 May 2015	
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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is a self-governance modification because it is unlikely to have material effect on consumers and transporters.

Why Change?

It is important that the Distribution Network gas transporters have appropriate information regarding consumption patterns on their gas networks to help plan for local and national emergencies. This information is especially important for the largest individual site loads. At present there is no clearly defined or mandated mechanism for such individual site information to be provided to the transporters, and no process for storing or maintaining such information.

Solution

It is proposed that daily read customers (i.e. product 1 post Nexus) connected to a DN would be able to register their site needs in advance of potential emergency conditions (on a Site Characteristics Register established for the purpose). In the event of a local emergency the DN would be able to use this information and have regard for these site needs when handling the emergency, removing the need for further information provision during emergency conditions. For the avoidance of doubt simply having their site needs registered does not provide the customer any further protection or leeway from being curtailed and the transporters will continue to have complete discretion over how they handle an emergency. Furthermore, the creation of the register does not prevent individual customers from discussing its requirements in more detail with gas transporters as desired or prevent it from making its requirements known to the transporters in the event of an issue.

Relevant Objectives

This modification provides greater certainty to the transporters that a customer will reduce its gas consumption in a timelier manner when required. The modification will therefore have positive impacts to relevant objectives a) & b).

Implementation

No implementation timescales are proposed. However, this modification has been optimised for post Nexus metering classes and is intended to be implemented at the same time as Project Nexus.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification is not intended to have any impact on core systems; therefore it will not have an impact on Project Nexus delivery.

2 Why Change?

It is important that the DN gas transporters have as much information as possible regarding consumption patterns on their gas networks to help plan for local and national emergencies. This information is especially important for the largest individual site loads and for many such sites the lack of readily available information on their gas needs may hamper the speedy resolution of the emergency. At present there is no clearly defined mechanism for such individual site information to be provided to the transporters, and no process for storing or maintaining such information.

3 Solution

Class 1 sites connected to the distribution network, will be able to join a register with the purpose of notifying their transporter of their site's characteristic with regard to gas supply to notify the transporter what is required to facilitate efficient shut down of the site. It is our understanding that sites directly connected to the NTS have more frequent dialogue and so such a process is unnecessary and therefore the NTS is out of scope for this modification.

To enable this, the process would be triggered by the shipper on behalf of the customer submitting a formal request to the transporter to join the register. The shipper will be required to provide justification for this request as part of the submission. As part of the submission, the customer would have to provide detailed and independent information to support their submission. ***For the avoidance of doubt simply having their site characteristics registered does not provide the customer any further protection or leeway from being disconnected; the transporters will continue to have complete discretion over how they handle an emergency.***

The transporter will then be required to provide a response, acknowledging that they have received the information and asking for any clarifications they deemed acceptable.

As part of its consideration of the submission, the transporter may ask for any additional information it reasonably requires to support the submission.

Business Rules

1. A register (the Site Characteristics Register) will be established, detailing site specific system needs when a customer is directed to discontinue taking gas from the network during an emergency as defined under UNC TPD Section Q.
2. DN transporters shall be responsible for maintaining the Site Characteristics Register
3. Submissions to join the Site Characteristics Register will be submitted by shippers on behalf of their customers to the relevant transporter. Submission to join the register can be made at any time.
4. Submissions to join the register for the next gas year can be made up to 120 Calendar days in advance of the commencement of that gas year.

Example: Submissions made between 3 June (which is 120 calendar days before the end of the gas year) and 30 September will need to specify which gas year the submission relates to. So a submission made on 10 June 2015 will need to specify whether the submission relates to gas year 2014/2015 or 2015/2016.

Submissions made between 1 October and 2 June will be registered in the gas year in which the submission is made. so, a submission made on 26 January 2015 cannot specify that it relates to

the 2015/2016 gas year (which commences on 1 October 2015). It must, for the purposes of BR5 f, state that it relates to the 2014/2015 Gas Year which commenced on 1 October 2014.

5. Each submission to join the Site Characteristics Register must set out:
 - a. Name of the customer
 - b. Applicable Meter Point Registration Number (MPRN)
 - c. End user emergency contact details to be used during an emergency with sufficient backup emergency contact details as defined under UNC TPD Section Q.
 - d. Preferred shutdown timescales and preferred gas needs during that shutdown process.
 - e. Detailed and independent justification for the submission, including details on the likely damage (including cost) a site may incur or the hazards that may be caused if they are required to shut-down immediately.
 - f. The Gas Year (or part thereof) the submission is intended for.
6. Shippers may only apply for a single MPRN per submission.
7. No submission can be made unless:
 - a. It can demonstrate through independent analysis that it will suffer damage or cause a hazard specifying time and financial cost to replace equipment, along with an estimate of lost production.
 - b. It is a Class 1 site.
 - c. It is not connected to the NTS
8. If a site no longer meets the criteria set out in BR7, then they must immediately inform the transporter directly who will then update the Site Characteristics Register.
9. Once accepted onto the Site Characteristics Register, the transporter is not required to verify or update the information that have been provided to it.
10. Once submitted the submission may be amended if agreed to by the transporter. (this process can be initiated by either party and is intended to accommodate changes following any discussion). Any update will be treated as an acceptance onto the Site Characteristics Register in accordance with BR 14.
11. Transporters will respond no later than 90 calendar days after any submission received. Any response will contain the following information:
 - a. Name of the customer.
 - b. Applicable MPRN.
 - c. Whether the site's information has been placed onto the register.
 - d. Whether it require any further information.
 - e. The period the Supply Meter Point will be present on the register
12. As part of its consideration of the submission, the transporter may ask for any additional information it reasonably requires, the transporter may then have 14 calendar days from receipt of the additional information to accept or reject the submission.
13. Once accepted onto the Site Characteristics Register the customer details will be remain on the register until the end of the Gas Year to which the submission relates and as specified in the submission in accordance with BR 5 f and the Transporter's response in accordance with BR 11

- e. For the site to remain the information will need to be resubmitted in accordance with BR 3 to be placed back onto the register.
- 14. During an emergency the transporter will have regard for the Site Characteristics Register, but will not be obliged to act on the information contained therein.
- 15. The transporter may share any or all of the information contained on the Site Characteristics Register with National Grid NTS.
- 16. Being on the register will not necessarily mean that a customer will be treated differently to any other customer not on the register during an emergency.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	This service will not impact on Xoserve systems as this is an agreement directly between the transporter and the customer and therefore should not incur a User Pays charge.
Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.	Not applicable
Proposed charge(s) for application of User Pays charges to Shippers.	Not applicable
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	Not applicable

4 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	Positive
b) 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.	Positive
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	None
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The proposals set out in this modification would further Relevant Objectives a) and b) – as a clear process of prior notification to the transporter of a site's gas needs during an emergency will aid planning management and coordination of network emergencies and allow parties put in place suitable communication processes.

5 Implementation

Although no timescales are proposed, it would be desirable if implementation coincided with Project Nexus Implementation Date.

6 Impacts

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No impacts identified.

Pre Project Nexus Implementation

No impacts identified.

Project Nexus Implementation

Although proposed to be implemented at the same time as Project Nexus, this modification is not intended to have any impact on core systems; therefore it will not have an impact on Nexus delivery.

Post Project Nexus Implementation

No impacts identified.

7 Legal Text

Text Commentary

UNC Section Q Emergencies

A new section 2.8 is to be inserted into Section Q.

2.8.1 - This section has been produced to allow a register to be established that contains site specific information. The information that is contained in this section includes the time that it takes to shut down the site, gas needs during an emergency and the eligibility to be included on the register.

2.8.2 - Shippers will be prevented from submitting a request to place a consumer on the register unless they are able to independently demonstrate the damage or hazard of them shutting the down immediately, that they are a Class 1 site as set out in G1.5 and they are not an NTS Supply point.

2.8.3 – Shippers will be able to submit a request for a consumer to be placed on the Site Characteristics Register at any time as long as they provide the information needed to fulfil the request.

2.8.4 – A submission will only be accepted if it relates to a single meter point reference number.

2.8.5 – Details the amount of time that the Transporter will have to respond to each Site Characteristics submission. This section details the information that will be included in the reply from the Transporter.

2.8.6 – If the Transporter has requested further information they will either accept or reject the additional information within 14 days of receiving it.

2.8.7 - Site Characteristic information will remain on the register until the end of each gas year which falls on the 30th September.

2.8.8 – Information to be added to the register can only be submitted 120 calendar days in advance on the gas year. Site Characteristic Submissions made between the 3rd June and the 30th September will need to specify which gas year it relates to. Requests that are submitted between the 1st October and the 2nd June will be registered to the current gas year.

2.8.9 – Updates can be made to the Sites Characteristics submission if agreed by the Transporter this process can be initiated by either party. Updates to the register will be subject to the criteria set out in paragraphs 2.8.2 and 2.8.3.

2.8.10 – If a consumer wishes to stay on the Site Characteristics register then they will be required to send another submission to the Transporter each year.

2.8.11 – If a Shipper becomes aware that a site no longer meets the requirements to remain on the site Characteristics register then they will promptly make the Transporter aware. Transporters will be under no obligation to verify the information or update the information provided to it.

2.8.12 – Transporters will be allowed to share the information that it holds on the register with National Grid NTS.

2.8.13– Transporters shall take account of the information held on the Site Characteristics Register during an emergency, but they will not have to act on the information.

2.8.14 – Being on the Site Characteristics Register will not mean that a customer is treated any differently to those not on the register during an emergency.

Text

The following Text has been prepared by Scotia Gas Networks, and no issues were raised by the Workgroup regarding its content.

SECTION Q – EMERGENCIES

To be inserted as a new paragraph 2.8

2.8 Site Characteristics Register

2.8.1 For the purposes of this Section Q:

- (a) a “**Site Characteristics Register**” means the register established (and amended from time to time) by the Transporter containing the site specific Site Characteristics of a Site Characteristics Consumer.
- (b) “**Site Characteristics**” means the preferred shut down timescales and preferred gas needs of the Site Characteristics Consumer during an Emergency.
- (c) a “**Site Characteristics Consumer**” is a consumer of a Supply Point which is Daily Read and connected to the Distributed Network (provided always that such consumer is not already a Priority Consumer) who satisfies the Site Characteristics Criteria and whose name appears on the Site Characteristics Register in accordance with the provisions of paragraph 2.8.3.
- (d) “**Site Characteristics Criteria**” means the criteria set out at paragraph 2.8.2(a) for the purposes of assisting Users determine which consumers are eligible to be Site Characteristics Consumers.

2.8.2 A User shall be precluded from making a submission (“**Site Characteristics Submission**”), on behalf of consumer, for the consumer to be added to the Site Characteristics Register unless:

- (a) it can demonstrate through independent analysis that it will suffer damage or cause a hazard (including the time and financial cost to replace equipment and an estimate of lost production) if they are required to shut down immediately;
- (b) it is a Class 1 site as defined in G1.5; and
- (c) it is not an NTS Supply Point

2.8.3 A User shall be entitled to make a Site Characteristics Submission at any time on behalf of consumer to the relevant Transporter, and must, when submitting a Site Characteristics Submission, state in each Site Characteristics Submission:

- (a) the name and (in the case of a corporation) registered office of the consumer;
- (b) the relevant Meter Point Reference Number;

- (c) the names and/or job titles of representatives of the consumer who can be contacted during an Emergency with at least three telephone number for each representative by means of which the Transporter may contact them, 24 hours a day;
- (d) the Site Characteristics of the consumer;
- (e) detailed and independent justification for the Site Characteristics Submission (including the time and financial cost to replace equipment and an estimate of lost production) if they are required to shut down immediately;
- (f) the Gas Year (or part thereof) the Gas Year the Site Characteristics Submission is intended for; and
- (g) any information that the Transporter may reasonably require to enable it to consider such Site Characteristics Submission.

2.8.4 Any Site Characteristics Submission made by a User in accordance with paragraph 2.8.2 and 2.8.3 shall only be deemed valid where it relates to a single Meter Point Reference Number.

2.8.5 The Transporter shall respond to each Site Characteristics Submission submitted within 90 calendar days after a Site Characteristics Submission is received stating in its response:

- (a) the name and (in the case of a corporation) registered office of the consumer;
- (b) the Meter Point Reference Number of the consumer;
- (c) whether the site's information has been placed onto the Site Characteristics Register;
- (d) the period the meter will be present on the Site Characteristics Register; and
- (e) whether any further information is required by the Transporter.

2.8.6 Where the Transporter requests further information in accordance with paragraph 2.8.5(e), the Transporter shall either accept or reject the submission within 14 days of receiving the additional information requested.

2.8.7 Once the consumer has been accepted onto the Site Characteristics Register, it will remain on the Site Characteristics Register until end of the Gas Year to which the Site Characteristics Submission relates and as specified in the Site Characteristics Submission in accordance with paragraph 2.8.3(f) and the Transporter's response in accordance with paragraph 2.8.5(d).

2.8.8 A Site Characteristics Submission to be added to the Site Characteristics Register for the next Gas Year may only be made up to 120 calendar days in advance of that Gas Year. By way of example:

- (a) Site Characteristic Submissions made between 3 June (which is 120 calendar days before the end of a Gas Year) and 30 September will need to specify to which Gas Year the Site Characteristics Submission relates. For example, a Site Characteristics Submission made on 10 June 2015 will need to specify whether the Site Characteristics Submission relates to Gas Year 2014/2015 or 2015/2016; and
- (b) Site Characteristic Submissions made between 1 October and 2 June will be registered in the Gas Year in which the Site Characteristics Submission is made. For example, a Site

Characteristics Submission made on 26 January 2015 cannot specify that it relates to the 2015/2016 Gas Year (which commences on 1 October 2015). It must, for the purposes of paragraph 2.8.3(f), state that it relates to the 2014/2015 Gas Year (which commenced on 1 October 2014).

- 2.8.9 Once submitted the Site Characteristics Submission may be amended if agreed to by the Transporter (this process can be initiated by either party and is intended to accommodate changes following any discussion). Any update will be treated as an acceptance onto the Site Characteristics Register, subject always to the criteria set out at paragraphs 2.8.2 and 2.8.3. being satisfied.
- 2.8.10 In order for any Site Characteristics Consumer to remain on the Site Characteristics Register, the Registered User shall be required to send another Site Characteristics Submission in accordance with paragraphs 2.8.2 and 2.8.3. If the Site Characteristics Submission is successful the Site Characteristics Consumer will remain on the Site Characteristics Register for a further year until 30 September. The Registered User will need to go through this process every year if it would like the Site Characteristics Consumer to remain on the Site Characteristics Register.
- 2.8.11 The Registered User shall promptly inform the Transporter where it becomes aware (and shall take reasonable steps to ensure that it does become aware) that a site no longer meets the Site Characteristics Criteria, whereupon the Transporter shall update the Site Characteristics Register. For the avoidance of doubt, the Transporter shall be under no obligation to verify or update the information that has been provided to it by the Registered User.
- 2.8.12 The Transporter shall be entitled to share any or all of the information contained on the Site Characteristics Register with National Grid NTS.
- 2.8.13 The Transporter shall have regard to the Site Characteristics Register during any Emergency, but is not obliged to act on the information contained on the Site Characteristics Register.
- 2.8.14 Users and Transporters acknowledge that in an Emergency the Site Characteristics Consumer's interests will be subordinate to the need to take Emergency Steps in accordance with this Section Q and nothing in this Section Q or the Emergency Procedures shall limit the ability of the Transporter to take any action or step necessitated in its judgment in the interests of safety by an Emergency nor provide the Site Characteristics Consumer with any entitlement to preferential treatment against any other consumer.

8 Consultation Responses

Of the 10 representations received 6 supported implementation, 1 offered qualified support, 2 provided comments and 1 was not in support.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
British Gas Trading Ltd (BG)	Comments	a) - None b) - None	<ul style="list-style-type: none"> • In recognising that the modification seeks to create a clear process for large gas customers to provide information (if they wish) to the Gas Transporters for use in emergency planning and constraint management with the suggested benefit that it will help ensure large customers keep emergency contact details up to date as well as enabling customers to have dialog with the Transporters, BG do not believe that the modification will necessarily deliver the benefits it intends. • Believe that as keeping emergency contact details up to date is already a UNC obligation, a modification looking to ensure that consumers and Transporters engage is not required. • Notes that Transporters have indicated that during an emergency it is unlikely that they would use the information, as network safety and security of supply for domestic customers are their legislative priorities. • As the proposal is essentially asking Transporters to keep and update a spreadsheet once p.a., BG do not think the proposal is damaging to the industry either. • Concerned that the administration cost associated with managing and maintaining the process may filter through to consumers. • Remain concerned that some consumers may believe that the process offers them some kind of insurance against a gas deficit or emergency event and therefore do not invest in a subsequent back-up supply. It is noted however, that the Proposer has tried to address this potential concern. • Agrees with the self-governance status.
Corona Energy	Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Believes that for a demand side response activity, it is vital that Gas Transporters have the correct customer information and consumption profiles to allow Gas Networks to manage local and national emergencies. • Believe that the modification should allow larger customers to provide accurate emergency contact details. • Agrees with the self-governance status. • Believes that implementation should be made immediately after Panel decision.

E.ON	Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Believes having the best information available about a site can only help the networks manage a local emergency. This modification will incentivise certain large customer to ensure they provide accurate contact information to be used in an emergency. • Agrees with the self-governance status. • In order for the process to be in place for the coming gas year, the modification must be approved before the end of May, so implementation as early as possible would be desirable. • Are unlikely to develop any system support for this process, given the number of potential candidates for the service. Equally the costs will be driven by the number of applicants and the degree to which they need assistance, but in their opinion the costs will be low.
Gazprom Energy	Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Believes that the modification introduces a useful process for large customers to be able to communicate with the relevant gas networks should they wish to provide site specific information that may be of use to the network in understanding a sites characteristics. • Agrees with the self-governance status. • Believes that due to the limited impact, there are no reasons why the modification could not be implemented forthwith.
National Grid Distribution (NGD)	Comments	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Believes that they already have clearly defined obligations that include the ability to instruct end users to reduce their intake of gas. Firm Load Shedding (FLS) is predominantly carried out in a generic manner across the Network with the aim of limiting supplies from the NTS Offtakes. For this reason, NGD call agents will contact the largest sites in the Network first, and continue to do so until their objective has been achieved. Although there is no harm in having access to this data, NGDs view is that there is limited value to be gained from it. • Agrees with the self-governance status. • Recognises that whilst not yet quantified, costs related to the development and ongoing maintenance of the contact register are likely.
RWE npower	Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Supports this change as it is imperative that gas transporters have the best information to hand when managing an emergency. This modification seeks to incentivise large gas customers to provide information to the gas transporters so that it can be used to manage emergencies and constraint management. • As there is currently no defined process in place for large gas customers to provide information to the transporter or for processing the information, this modification seeks to elevate that issue.

			<ul style="list-style-type: none"> • Agrees with the self-governance status.
Scotia Gas Networks	Qualified Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Qualified support on the grounds that the relevant objectives are only weakly better facilitated due to the fact that the new process will not necessarily change the emergency processes. • Supports the principle of making further information available in relation to specific site characteristics but remains wary of customers being given the impression that this information/instructions for shut-down will always be considered during an emergency. During an emergency safety of the network and the availability of supply to domestic customers will always be a key priority and the information provided under this modification will only be taken into account where circumstances allow. • Agrees with the self-governance status. • Agrees with the Proposer that implementation should be post Project Nexus implementation. • Networks will face costs in managing the process, receiving information from Shippers, responding and storing the information and accessing it during an emergency.
SSE	Support	a) - Positive b) - Positive	<ul style="list-style-type: none"> • Believes that this modification allows a mechanism for large customers to be able to register site specific information with the gas transporters. This information can then be stored and maintained by the transporters and be used during gas emergencies in helping them manage any such emergencies. • The modification incentivises large customers to provide contact information to the transporters as it may benefit them during an emergency. • Agrees with the self-governance status. • Agrees with the Proposer that implementation should be at the same time as Project Nexus implementation.
Wales & West Utilities	Oppose	a) - None b) – None f) - Negative	<ul style="list-style-type: none"> • Believes that whilst the modification has a worthy aim of improved communication between large sites and transporters, it will not improve the load shedding process in practice. If load shedding is required then, depending on the nature of the emergency, there may be little choice in which sites have to shed load. When load shedding, Gas Transporter start with the largest loads on the relevant part of the network and work down. • Believes that regardless of whether a site has submitted information, they will still be phoned and a discussion had about the circumstances pertaining on that particular day. This means that the information submitted and held under this proposal is, in practice, likely to be of little value. • Also have doubts that the information will be kept up to date during a year. • Believes it is not good practice to have a provision in Code which is in effect voluntarily for both parties and therefore could be considered detrimental to the

			<p>efficient administration of the code.</p> <ul style="list-style-type: none"> • Agrees with the self-governance status. • Agrees that if implemented the modification should come into effect at the Project Nexus go-live date. • Whilst recognising that they will incur some costs to set up and maintain the information, they do not think would add value to the load shedding process.
WINGAS UK Ltd	Support	<p>a) - Positive</p> <p>b) - Positive</p>	<ul style="list-style-type: none"> • Believes it is important that gas transporters have appropriate information regarding consumption patterns on their gas networks to assist in the planning for local and national emergencies. It is especially important for those sites with the largest loads as these will be approached by the networks first to reduce their loads during a demand side response activity in order to preserve domestic and vulnerable supplies. • Believes that the modification will be of benefit to the networks for managing such circumstances and will incentivise large customers to provide up to date emergency contact information. • Agrees with the self-governance status. • Implementation should follow immediately after a decision to do so. • Anticipates limited costs.

Representations are published alongside the Final Modification Report.

9 Panel Discussions

10 Recommendation

Panel Recommendation

Having considered the Modification Report, the Panel determined:

- that proposed self-governance Modification 0516S [should/should not] be made.