

## Representation

### Modification Proposal

#### 0412 - Changes to the Stages of Emergency Resulting from Changes Introduced by Exit Reform

**Consultation close out date:** 13 July 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** British Gas Trading Limited  
**Representative:** Chris Wright  
**Date of Representation:** 13 July 2012

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

It is our understanding that National Grid's Safety Case has been (or is being) updated in the light of NTS Exit reform initiatives, in particular the removal of demand side interruption capability. We also understand that it is the arrangements described in the Safety Case which would be followed in preference to any set out in the UNC.

Therefore, in the absence of this proposal, the UNC will not accurately describe the actions that NG – under the direction of the NEC – will carry out. This could lead to uncertainty or confusion. Since clarity of roles and actions are crucial to the successful mitigation and recovery from any emergency situation, we agree that it is necessary for the UNC to accurately reflect NG's intended actions.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

0412  
Representation

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13 July 2012

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Version 1.0

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Page 1 of 2

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Ensuring that the UNC accurately reflects NG's intended actions in an emergency situation gives rise to efficiency in the implementation and administration of the UNC.

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None.

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

Immediate upon direction.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes.

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.