

Initial Representation

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

Organisation: MEUC
Representative: Eddie Proffitt
Date of Representation: 21 February 2012 (by email)

I note that representation from consumer representation would be welcomed but unfortunately I cannot attend on 1st March, I would however make the following observations.

1. I believe that this modification is "jumping the gun". Ofgem is holding a stakeholders workshop only a week later on 8th March on the topic - Gas Security of Supply Further Interventions.
2. One possible further intervention could be for either the system operator or the NEC to contract through GDNs for commodity interruptible contracts if commercial interruptible contracts fail to emerge. The reason I have listed both the SO and the NEC is I would see the SO calling the interruptions prior to an emergency but the NEC if the interruption was part of the emergency procedure.
3. Such interruption could either be prior to or after declaring an emergency which could possibly have an impact on the stages of an emergency required.
4. Therefore I believe we should wait before taking this modification forward.
5. As to the proposal of merging the current stages 2 and 3 I seen no reason not to.

regards Eddie