

## Representation

### Draft Modification Report

#### 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:** National Grid Transmission  
**Representative:** Dave Corby  
**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.

This modification has been raised by National Grid Transmission (NGT) to reflect the changes to the emergency arrangements resulting from the full implementation of Exit Reform. This modification ensures consistency between the UNC and the Network Emergency Co-ordinator's Safety Case.

#### 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?*

This modification proposes to align the emergency framework of the Network Emergency Co-ordinator (NEC) safety case with the UNC. The NEC safety case has been updated to reflect the full implementation of the enduring exit regime introduced by Modifications 0090 and 0195AV. This alignment will promote efficiency in the administration and coordination of an emergency, affecting the safe and efficient operation of the various Transporters' pipeline systems. As such the proposal facilitates Relevant Objective (A) "Efficient and economic operation of the pipe-line system".

In addition, aligning the UNC with the proposed NEC Safety Case changes will ensure that there is no discrepancy in the governance arrangements.

As the modification ensures that UNC emergency actions are aligned with the changes to the NEC Safety Case, the proposal also facilitates Relevant Objective (C) "Efficient discharge of the licensee's obligations".

### **Impacts and Costs:**

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

No costs or other impacts have been identified.

### **Implementation:**

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

No lead time is necessary as no systems implementation is associated to this modification.

### **Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] 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