

## Representation - Draft Modification Report UNC 0834S

### Inclusion of the “Process for the Update and Retention of Shared Site Drawings” as a Subsidiary Document within the Offtake Arrangements Document

**Responses invited by: 5pm on 10 May 2023**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Shiv Singh
<b>Organisation:</b>	Cadent
<b>Date of Representation:</b>	05.05.23
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	a) Positive b) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

Cadent accepts that it is the site Owner that holds and is responsible for the site drawings, including the Hazardous Area(HAZ) drawing. The separation of Site User responsibilities under OAD Section B 1.6.1(a) and Site Owner under B 1.6.1(b) is helpful in clarifying these responsibilities, as is the provision that 1.6.1(b) is ‘subject to’ 1.6.1(a).

For the avoidance of doubt, it may help to further clarify that it is the Site User that is responsible for HAZ drawings pertaining to Site User Connection Facilities contained within the whole site documentation. Two potential options for achieving this are:

1. Amend B 1.6.1(b)(iii) to read as follows: “in particular, the preparation of any whole site diagrams required for compliance with any such Legal Requirement, including Hazardous Area diagrams and COMAH diagrams (but specifically excluding any Hazardous Area diagrams prepared by the Site User in relation to the Site User’s Facilities under paragraph 1.6.1(a) above), and in accordance with the Process for the Update and Retention of Shared Site Drawings, and”, or
2. Amend the related Subsidiary document to clearly state HAZ drawing responsibilities for the respective zones.

Given Cadent has raised this concern and discussed it at length at workgroup, we are disappointed that National Gas has chosen not to address this at this time. But for this concern, Cadent would be supportive of this proposal.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

We agree that self-governance applies as there is no material impact on any concerned party.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

Implementation can take place as soon as is recommended.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes, but see our comments above.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

n/a

**Please provide below any additional analysis or information to support your representation**

None.