

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

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

Representative:	Stephen Ruane
Organisation:	National Gas Transmission
Date of Representation:	10 May 2023
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

As the proposer, National Gas Transmission (“NGT”) supports the implementation of this Modification Proposal.

This Proposal addresses a deficiency in the current arrangements regarding the management of changes to Shared Site Drawings. The current absence of change governance would be addressed by the implementation of this Proposal which would introduce a new Offtake Subsidiary Document that establishes a process for making such revisions.

On this basis we continue to believe that adoption of clear rules or how such changes are governed will enable Transporters to operate their Networks efficiently as change proposals will be more transparent and progress in accordance with a more defined timescale (thereby better facilitating relevant objective (a)).

Further, due to the shared ownership nature of the sites concerned a more defined governance process will enable Transporters to better co-ordinate any changes made at shared sites and therefore enhance the efficiency of operating the relevant assets (thereby better facilitating relevant objective (b)).

Self-Governance Statement:

NGT continues to believe that the proposed change would have no material impact on the commercial activities of Shipper Users, Gas Transporters or Gas Consumers, therefore the application of Self-Governance procedures is entirely appropriate.

Implementation:

Although no lead time is required for implementation from an NGT perspective, we understand that as Self-Governance procedures are applicable, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

It is worthy of note that in respect of the collaborative processes outlined in the Offtake Subsidiary Document, as these were conceived by the respective Drawing Management Office's for each Transporter, they have begun working to those principles already.

Impacts and Costs:

NGT will not incur any material costs in the event of the implementation of this Proposal

Legal Text:

NGT is satisfied that the legal text delivers the intent of the solution identified in this Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

NGT has not identified any such errors or omissions.

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

We note that in its representation dated 5 May 2023 (published 9 May 2023) Cadent Gas has offered support but qualified this on the basis of a preference for the Proposal to have included clarification of responsibilities for the preparation of Hazardous Area diagrams.

Whilst Cadent has qualified its support on this basis, this was discussed extensively within Workgroup (and indeed in bi-lateral discussions with Cadent) where we consistently set out our belief that seeking to include such clarification was out of scope of this Proposal, the remit of which was deliberately limited to implementation of the following recommendation as set out in the [Request Workgroup Report for Request Group 0646R](#):

Further Modifications

Further Modification(s) are expected to be progressed by OAD parties following the closure of Workgroup 0646R for the following areas:

- *Proposed Modification for the management of site drawings. This Modification is to propose an OAD reference to a new OAD subsidiary document for the management of site drawings between Transporters. This aims to improve consistency and provide process clarity. The process was developed by an offline process expert workgroup.*

Given this, our view is there was no remit for Modification 0834S to incorporate additional elements outside this specific recommendation of the Request Group 0646R conclusions and that if necessary, separate discussions on the topic of Hazardous Area diagrams were held.

Further to a bi-lateral meeting between NGT and Cadent held ahead of the final Workgroup Meeting on 27 March 2023, both parties concluded that as a consequence of the limited scope of Modification Proposal 0834S, the optimal approach for the Hazardous Area diagrams issue was for it to be raised as a topic for discussion in the Offtake Arrangements Workgroup. This conclusion is reflected in the [minutes from the subsequent final Workgroup Meeting on 23 March 2023](#) (attended by Simon Howard from Cadent Gas), the relevant extract is as follows:

4.0 Amended Modification

Stephen Ruane [NGT] noted that hazardous areas is a complicated process and will require a review at some point. Darren Dunkley [Cadent Gas] has advised the process may need a slight tweak to accountabilities which would require a broader scope than the intention for this Modification 0834S. It was also noted that Darren Dunkley plans to raise this as a topic at the Offtake Arrangements Workgroup and that he is happy to proceed with Modification 0834S without the wider scope of accountabilities for hazardous areas.

At the conclusion of Workgroup assessment for this Proposal, the participants agreed that accountability for Hazardous Area Drawings was out of scope of this Proposal, this is recorded in the following section of the [Workgroup Report](#):

Workgroup Impact Assessment

Workgroup Participants agreed with the statements made by the Proposer.

The question of accountability for Hazardous Area Drawings was discussed by the Workgroup and Participants agreed that such accountability is set out in relevant legislation and in any event falls outside the scope of this Proposal which seeks only to better define the processes by which drawings are managed. Workgroup Participants did not identify any other concerns.

Notwithstanding the 'qualification' matter it has raised, we note that Cadent has nonetheless concluded that implementation of this Proposal would better facilitate Relevant Objectives (a) and (b) and that matters relating to its qualification aside, the legal text prepared by NGT delivers the intent of the solution.