

0646R OAD Review Group
Proposal for Code Amendments
for the second OAD Modification

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Version History

Version	Status	Date	Author(s)	Amendments
v0.1	Draft	21.04.20	Darren Dunkley (Cadent)	Creation of draft proposal

Background

Delivery of Modification 0683 will see several key changes implemented into the Uniform Network Code's OAD (Offtake Arrangements Document) framework. This was only a portion of the original requirements that was identified by Cadent that needed review for the industry work group, 0646r, at the beginning of the review process.

The outstanding requirements can be categorised as follows:

- Development of industry processes for updating another operator's drawings
- Development of the appropriate requirements and protections to support Integrated Security Solution (ISS) sites
- Amendments and enhancements to the requirements supporting maintenance planning and sharing between operators
- Other additional code modifications

The review group (0646r) has an outstanding list of issues that have been captured on an issues log. These have been reviewed previously but now that 0683 will be approved within the near future these issues need to be reviewed again. This proposal will only focus on the requirements that have been considered necessary under the last bullet point from the list above.

Objective

To review the outstanding items on the issues log to determine suitability and subsequent inclusion into the scope of the next planned UNC modification that will enhance the OAD framework.

Proposal

There are eleven clauses that are currently identified on the issues log. These issues have been reviewed previously by the work group in early 2019 and were considered to have sufficient merit for further assessment.

These issues can be categorised into the following types and may align to more than one:

- *Definition Enhancements*

A requirement to amend an existing defined term within the code as the existing arrangements do not provide the concise clarity deemed necessary. This results in different interpretations being applied by the operators which then impacts upon what other subsequent OAD clauses should then apply.

- *Process Enhancements*

A requirement to amend a process that is either document in code or one that has been implemented between the operators to support an OAD obligation. Amendments are suggested so that operators can more easily comply with the confirmed requirements and will assist in more efficient and effective engagement between the parties.

- *Code Enhancements*

A requirement to make minor modifications to code either to correct mistakes, remove ambiguity or contradiction between clauses, and align clauses together correctly to make the code more robust.

These issues are documented in Appendix 1 and contain a high-level overview of the requirement to be addressed. In addition to the 11 clauses, the group should also, for completeness, review the code again to identify any subsequent issues that may have had a consequential impact from the requirements that were introduced via the first modification, MOD 0683.

Only once the review has been undertaken can the issues then be prioritised. However, the intention will be to develop the necessary solutions for those items that the group agree need to be addressed and that these changes are processed alongside one of the other streams (Drawings, CNI, Maintenance) to minimise the admin burden and cost.

Action

Operators are to review the 11 clauses in Appendix 1 to seek a way forward to resolve the underlining concerns, and to review code again to ensure that there are no subsequent issues that have arisen from the first modification, 0683.

Appendix 1:

Clause	Type of Change	High Level Requirement
B1.2	Definition Enhancement	<p>Offtake and Offtake Site Definitions</p> <p>The definition for an offtake site is ambiguous and not fit for purpose especially where sites are located within a wider site. This impacts upon applying correctly subsequent obligations and requirements under OAD such as site access (B3.7); security requirements in site services; and any other safety requirements as described in Section C.</p>
B1.5.2 (a) & (b)	Code Enhancement	<p>Updating/Entering into Supplemental Agreements</p> <p>Minor amendments are required to these clauses to remove the specific referencing of Appendices and make the requirement more generic. By doing so, the clauses will not need to be enhanced again for future modifications.</p>
B1.5.3	Code Enhancement & Process Amendment	<p>Revising a Supplemental Agreement</p> <p>It is still seen as difficult to agree and process a Supplemental Agreement on or before operational acceptance of assets on site. A review of the process around this subject area is needed and if revisions are necessary then these will impact this specific clause.</p>
B2.2.4	Code Enhancement & Process Amendment	<p>Requirement to provide 12-month OAD notices</p> <p>All operators concede that it is difficult to demonstrate compliance with the 12 months' notice requirement in this clause. The clause needs to be reviewed between the operators to agree an alternative approach that is more practical to comply with but works in the spirit of providing as much notice as possible.</p> <p>OAD notices should also detail the impact of any planned work upon the other operator so that notice can be reviewed efficiently and effectively. This is especially important if an OAD notice has been submitted without much notice.</p>
B3.4.4	Code Enhancement	<p>Considerations for Site Users upon raising OAD Notices</p> <p>It is proposed that this clause should be enhanced not just to cover relocate site users' assets to their own land but also to review the separation of shared assets to remove the complexity that exists at some sites.</p>
B6 (B6.2.2 & B6.3.1)	Code Enhancement	<p>Access Rights & Site Access</p> <p>The requirements do not cover the deployment of restricted areas under the CDM regulations that can and do impact the other operator either accessing site or in some cases their own assets. CDM needs to be covered appropriately and the clauses need to link back to "Affected Party" in B2.2.3</p>
L2.3.1	Code Enhancement & Process Amendment	<p>Cost Recovery</p> <p>Cost Recovery should be identified and agreed as part of the OAD notification process and not after work has been</p>

		delivered. The only exception to this rule is for Emergency purposes or where one operator has "interfered" (i.e. without permission) with another's assets.
N2.1.2	Code Enhancement	<p>Definition of "Parties"</p> <p>The original requirement may have been resolved however, this clause still needs to be updated to reflect shared sites. This may have been an oversight from MOD 0683.</p>
N3.2.2	Process Enhancement	<p>Process for Amending Supplemental Agreements</p> <p>Requirements are to be covered by developing and agreeing a process for how Supplemental Agreements are to be updated between the operators. This was put forward by Cadent under the "Proposal for Updating Supplemental Agreements" with the intent that this becomes an OAD subsidiary document rather than being hard wired into code.</p>
N9.1.1	Code Enhancement	<p>Transmission System Operator to Distribution System Operator Agreement Guidelines</p> <p>This requirement is likely to be defunct following separation of Cadent / National Grid SCADA systems in 2020. The group needs to review whether these requirements are needed for anything else as if not then consideration should be given to remove them from OAD.</p>
Dispute Process	Process Enhancement	<p>Disputes</p> <p>Requirement requested by National Grid. The group needs to review the disputes process that is needed to support the OAD framework going forward, especially with the enhancements that will potentially be made upon delivery of all the necessary changes via the MOD process. OAD may need to be updated to reflect the correct escalations that need to be followed.</p>

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