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Dear Julian

RE UNC Modification Proposal 0042 – Revisions to Section Q to facilitate the revised NEC Safety Case

Thank you for the opportunity to comment on this Modification Proposal.

At first sight this Modification Proposal is presented as a series of necessary changes to obligations contained within Uniform Network Code brought about by a revision of the Safety Case prepared by Transco governing the action to be pursued by the National Emergency Co-ordinator in the event of a gas emergency situation. However, the reality is that the Safety Case has been a particularly opaque process to date and it is only relatively recently that Users have been afforded any visibility of the process at all.

For the avoidance of doubt, we do not in any way wish to prejudice the effectiveness of the processes to be followed in the event of an emergency. The primary concern of the entire industry is to make arrangements for the safe operation of the Transmission and Distribution systems and this must not be compromised.

The Modification Proposal does contain a number of measures, which have significant commercial impacts, but are unproven in their effectiveness within the Safety Case. These changes may serve to alter the value, which Users have assumed for use of certain provisions, for example gas in storage facilities. This demonstrates the need for a more open process to determine the most appropriate measures to be incorporated within the Safety Case, which may still have commercial consequences but these would be confined to those, which were necessary and unavoidable.

In summary, we are not supportive of the implementation of the Modification proposal in its current form as it has not taken account of the industry concerns which have been expressed.

Please contact me if you require any further information.

Yours sincerely,

Mike Young
Commercial Manager