

**Representation For. 0045**  
"Provision of Available Interruption Information"  
Version 2.0

**Date of Communication:** 08/09/2005  
**External Contact:** Beverley Grubb (Scotia Gas Networks)  
**Slant:** For  
**Strictly Confidential:** No

**Abstract**

Dear Julian

**Modification Proposal 045: Provision of Available Interruption Information**

SGN welcomes the opportunity to comment on the above modification proposal.

SGN supports the proposal presented by UKT.

Section I of the UNC OAD currently requires DNO's to pass information to Transco NTS on an annual basis regarding the level of interruption available on their network. Regular updates must also be provided "from time to time" or as soon as practicable after any material change. SGN accepts the exact timing of such updates is not particularly clear and there is a risk that at any point in time Transco NTS may base a decision on information that is not the most accurate or up to date information available. This is compounded by the fact that Section I specifies that the information to be provided by the DNO must be based on Supply Point Capacity. Again, this is not necessarily the most accurate basis on which to judge the actual level of interruption likely to be available on a particular day. There is a risk that this could vastly overstate the interruption available.

SGN believes that improvements could be made to the accuracy and timing of information. Such changes could improve the accuracy of interruption decisions and confidence that the interruption called is likely to have the required results. This could in turn reduce the need for further action to be taken. SGN believes this would better facilitate the relevant objectives, ensuring the economic and efficient operation of the system. Improvements in the timeliness and accuracy of information and effectiveness of any actions taken are also likely to benefit security by reducing the potential for further action or escalation of any incident.

However, SGN does not believe that changes are specifically required as a matter of urgency for this coming winter. SGN understands that GNCC currently has access to the same data as was available prior to DN sale. This is expected to continue over this coming winter. Access to such information is only likely to be restricted from next year with the roll out of the Integrated Gas Management System. At that point information will be restricted. However SGN believes a simple and pragmatic solution could be implemented to allow daily extraction of information. Further work is required in this area. An impact assessment will need to be carried out. Once

available further consideration could be given to the mechanics of implementation. As the legal text is not specific in this area, this needn't affect progress of this proposal.

SGN notes the proposed legal text suggests the proposal should be implemented by inserting a new clause in the OAD Section I 5.1, requiring DNOs to provide information on a daily basis at 18:00 on the preceding day. There is no suggestion that existing provisions will be removed. The DNO would still be required to provide an annual statement with updates from time to time or as soon as practicable after any material change. Such information would continue to be based on Supply Point Capacity. Given the comments made above and by UKT in the modification proposal, we question whether this will be necessary or appropriate.

SGN would also like to point out that under OAD Section I, whilst Transco NTS can request interruption, the request is for an aggregate amount of interruption by Exit Zone only, not by Supply Point or Shipper. The DNO selects the individual sites, issue instructions and ensure the aggregate amount of interruption is delivered. As such the information provision need not be complex.

We hope these comments are helpful.

Regards

Beverley Grubb  
Market Development  
Scotia Gas Networks