

Representation

Draft Modification Report

0338V: Remove the UNC requirement for a 'gas trader' User to hold a Gas Shipper Licence

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Health & Safety Executive**
Representative: Mike Potter
Date of Representation: 29 March 2012

Do you support or oppose implementation?

Qualified Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The strength of the legal text wording in section Q gives confidence that the necessary cooperation by Gas Traders with the NEC and SO will be achieved if and when required, via the necessary incentives. The legal wording as it stands is essential to HSE's support of the Mod. I must emphasize that if this wording were to be diluted in any way, before implementation of the Mod, that this support would have to be re evaluated.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

1- The 'Final' Mod report seems to be incomplete. On page 7 the first paragraph for TPDQ still appears to refer to section D text that was removed from an earlier version of the Mod (eg. 6 July 2011). It would seem to need rewording or clarification.

2 - I had suggested in earlier discussions with National Grid Gas (NGG) in December 2011, as one of the parties involved in writing and progressing the Mod, that an entry in the table 'Impact on Core Industry Documents and other documents' on page 17 needs amendment. Against the 'safety case...' line I recommend, as discussed and agreed with NGG on 29 Mar, that the Potential impact should read 'Potential minor impact on the NEC and the PGT (UKT) part of the National Grid Gas (as SO) GSMR safety cases' instead of 'None'.

0338V
Representation

29 March 2012

Version 1.0

Page 1 of 2

© 2012 all rights reserved

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

n/a

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

Minor review work on any NEC/National Grid (NTS) GSMR safety case amendments before implementation.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Dependent on resolution of above issues and satisfactory review of minor safety case changes

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes with respect to the Section Q considerations that interest HSE.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

n/a