

Representation

Draft Modification Report

0389: Simplification of Points of Telemetry

Consultation close out date: 16 November 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Scotland & Southern Gas Networks (SGN)**

Representative: Erika Melén

Date of Representation: 16 November 2011

Do you support or oppose implementation?

Qualified Support

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

This modification is looking to amend the Section E, Annex E-1 tables through removing void items, adding four new points of telemetry, expanding a number of items e.g. Instrument fault and Site Charger Alarm, amending comments and altering certain items from site specific to a minimum requirement e.g. Energy Integrator and Orifice DP.

Although SGN are supportive of an amendment of the Tables to reflect operational practices we do not believe that the proposal as it stands fulfils this purpose and would require an amendment to the modification/legal text for our full support. This amendment should clarify that the items indicated (minimum requirement and site specific points) are only required if they are available on the Telemetry Outstation and that it is not the intention of the modification to require installation of these marked points, if they do not already exist on the Remote telemetry units (RTU) or are included in the design. If this is not included in the modification and legal text this could result in substantial costs to the DNOs having to install and/or connect items to the telemetry. We assume that this is not the intention of the modification and so needs to be clarified.

We would also request that National Grid Transmission provide some further justification as to their requirement for certain items which we do not believe provide any benefit to them. These items include Outlet Pressure, Outlet Gas Temperature, Power, Charger GQ UPS, Generators Alarm (now expanded), Override Alarm and Heater Volume and Energy Integrators.

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

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As above

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer that the proposal, if amended, better facilitates relevant objective (b) as it will ensure that code is more reflective of actual operational practises.

Impacts and Costs:

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

In relation to the comments we have made regarding potential additional minimum requirements, SGN will face a cost associated with the implementation of this Modification Proposal. At this time we have not been able to reach an estimate of these costs and we would suggest that were the Modification Panel to determine this proposal requires further discussion and development at the relevant workgroup this issue should included within the group's remit.

Implementation:

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

Sufficient time should be provided to allow the capture of the new relevant data items.

Legal Text:

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

We believe that elements of the legal text are exceeding what the proposal sets out in regards to the minimum requirement/site specific status and comments attached to individual items and so should be developed further in line with our abovementioned comments.

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.

No