

Representation

Draft Modification Report

0389VS: Simplification of Points of Telemetry

Consultation close out date: 05 April 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Scotia Gas Networks
Representative: David Mitchell
Date of Representation: 05 April 2012

Do you support or oppose implementation?

Support

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

SGN is supportive of this modification as it proposes to bring the UNC, OAD Section E Annex E-1 in line with the current operational requirements. The proposed changes should remove any ambiguity that there maybe regarding the current OAD Annex references by amending the references that are questionable and replacing them with a clearer Annex references.

SGN feels that it is worth noting that we previously did not support this modification due to elements of the legal text that we felt exceeded what the proposal had set out to achieve. We now feel that these issues have been resolved and so are pleased to be able to support implementation.

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

N/A

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?

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This modification will better facilitate relevant objective (b) as it will ensure that the code is more reflective of actual operational practises and systems that are used to manage the interface arrangements between the National Transmission System and DNO systems post SOMSA.

Impacts and Costs:

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

SGN does not anticipate any costs in relation to the implementation of this modification following the revisions that have been made to the legal text in the modification.

Implementation:

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

N/A

Legal Text:

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

Yes

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.

SGN supports this modification on the assumption that we will not be obliged to install any additional equipment at any existing Offtakes or incur any additional costs as a result of implementation. During the development of this modification SGN had asked for an explanation for the need to supply outlet pressure(s), Temperature(s) and Filter DP's, we may potentially investigate these area's in the future.