

Representation

Draft Modification Report

0400S: Removal of obligation to install duplicate Telemetry Equipment

Consultation close out date: 30 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scotia Gas Networks

Representative: David Mitchell

Date of Representation: 30 March 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 represents an economic solution in the running of Offtakes by removing the requirement to install duplicate telemetry. The current system of using a SCADA link has been proven to be an effective way of transferring data between DNs and NTS therefore the installation of duplicate telemetry brings no obvious advantage to the industry. If duplicate telemetry was to be installed then the costs would ultimately feed through into end user energy bills which would be uneconomic.

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

No

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 that this modification fulfils relevant objective b) (i).

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Version 1.0

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Impacts and Costs:

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

As stated in the modification, this change could save NGT up to £9M of Capex. It should be noted however that DNs will face ongoing costs (which would not have been incurred should the duplicate telemetry be installed) in maintaining and configuring the SCADA to SCADA link. Although this cost to DNs should not outweigh the economic benefit to the industry as a whole of the duplicate telemetry not being fitted it will reduce the £9M saving to industry.

Implementation:

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

None

Legal Text:

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

We are satisfied with the legal text provided

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