

Representation

Draft Modification Report

0412: Changes to the Stages of Emergency Resulting from Changes Introduced by Exit Reform

Consultation close out date: 13 July 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Npower plc / RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 12 July 2012

Do you support or oppose implementation?

Support

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

The changes introduced by the introduction of enduring exit reform have required changes to the NEC's Safety Case. Implementing this modification proposal will ensure that the emergency stages and steps that might be carried out in the stages are aligned between the UNC and Safety Case. It is important that all industry parties are clear about their responsibilities in an emergency.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree implementation will have a positive impact on Code Relevant Objective(s):

f) Promotion of efficiency in the implementation and administration of the Code

Impacts and Costs:

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

None.

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Implementation:

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

Although not strictly necessary, our preference is that implementation is aligned with the introduction of the revised safety Case i.e. 1st October 2012.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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.

During development of this modification proposal, the role of DN interruption within the emergency framework was questioned. There were differing views expressed about the usage of DN interruption in the context of a national, as opposed to a local emergency. We would welcome clarification of this matter.