

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: Scotia Gas Networks
Representative: David Mitchell
Date of Representation: 11 July 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 will align the UNC and the NEC safety case; we believe that this change will therefore introduce consistency.

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

Although SGN is supportive of this modification we are mindful that DN interruption should not be used in emergency arrangements as a mechanism to implement emergency interruption as we feel that this would undermine the purpose of DN interruption and may curtail our ability to use DN interruption in times of peak demand on our networks.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe the implementation of this modification will meet both objectives A & C that have been set, as the modification will align both the UNC and the NEC safety case.

Impacts and Costs:

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

None

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Version 1.0

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Implementation:

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

SGN is able to implement the changes identified in this modification within the timescales that have been suggested in the modification implementation text.

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?

SGN is satisfied that the amended legal text will allow the successful implementation of this modification.

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