

## 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:** Scottish Power  
**Representative:** Gerry Hoggan  
**Date of Representation:** 13 July 2012

#### Do you support or oppose implementation?

Support

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

Aligning the UNC and NEC Safety Case will bring consistency that would be particularly vital in ensuring that any emergency is addressed effectively.

#### 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 believe that implementation of this modification will impact relevant objectives (a) and (c) regarding the efficient discharge of the licensee's obligations and promote efficiency in the implementation and administration of the Code respectively.

#### Impacts and Costs:

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

None

**Implementation:**

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

We agree with the recommendation of the Workgroup Report that it would be desirable for the change to be implemented by 1st October 2012 so that the UNC and NEC Safety Case are aligned when the enduring exit regime is introduced.

**Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver the intent of the modification?*

We are comfortable that the legal text provided will deliver the intent of the 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.*

No.