

Representation - Draft Modification Report 0516S
Information provision by large
Customers to aid understanding of site characteristics

Responses invited by: 24 April 2015

Representative:	Erika Melén
Organisation:	Scotland & Southern Gas Networks
Date of Representation:	17 th April 2015
Support or oppose implementation?	Qualified Support
Relevant Objective:	a) Positive b) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

SGN provide qualified support of this modification as we believe that the relevant objectives are only weakly better facilitated. This view is due to the fact that the new process will not necessarily change the emergency processes.

Although we support the principle of making further information available in relation to specific site characteristics we are wary of customers being given the impression that this information/instructions for shut-down will always be considered during an emergency. During an emergency safety of the network and the availability of supply to domestic customers will always be a key priority and the information provided under this modification will only be taken into account where circumstances allow.

Self-Governance Statement: Please provide your views on the self-governance statement.

We would support moving this modification to Self Governance as it will not have a material impact on customers or competition

Implementation: What lead-time do you wish to see prior to implementation and why?

We agree with the proposer that this should be implemented post Nexus implementation

Impacts and Costs: What analysis, development and ongoing costs would you face?

Networks will face costs in managing this process, receiving information from shippers, responding, storing the information and accessing it during an emergency

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

N/A