

Structural separation between transmission and distribution

A paper by NGT

Background

On the 11th June, Ofgem published for consultation a Regulatory Impact Assessment (RIA) on Offtake arrangements, which includes a consideration of business separation. Further to this, NGT has been requested to provide a paper setting out the degree of existing separation between transmission (NTS) and distribution networks.

This paper examines the degree of structural separation that currently exists between NTS and distribution. It highlights a number of functions in which the National Transmission System (NTS) has the potential to unduly discriminate in favour of Retained Distribution Networks (RDNs) and sets out the incremental separation measures that NGT proposes in order to address the concerns that exist.

1 Concerns of undue discrimination

Following network sales, Ofgem has to ensure that the new offtake arrangements deliver terms that are not unduly discriminatory to each distribution network.

Discriminatory conduct could potentially occur if Transco were to behave in a way that conferred an unfair commercial advantage on its RDN business, without objective reason, without making the same benefit available to each independent distribution network (IDN) or vice versa. Of particular concern are any opportunities for unduly discriminatory conduct that could arise when NGT makes operational decisions, communicates commercially sensitive information between business units, or when it allocates shared costs. The areas of Ofgem's concerns are described in the table below.

<u>Operational decisions</u> <ul style="list-style-type: none">• allocating offtake rights, including Permitted Maximum Daily Quantity and pressure commitments• contracting for flow rate flexibility and diurnal storage• operational management of flow rate flexibility and diurnal storage• contracting for and calling interruption• scheduling of maintenance
<u>Sharing commercial information</u> <ul style="list-style-type: none">• sharing of commercially sensitive information by the NTS with RDNs
<u>Cost allocations</u> <ul style="list-style-type: none">• allocation of RDN costs to the NTS

These concerns have been considered in assessing the appropriate actions for NGT to take upon the event of network sales.

2 Information Separation between NTS and distribution

Information separation in this context involves ensuring that RDNs cannot access information that could potentially confer an undue competitive advantage on their business relative to an IDN business and that NTS refrains from communicating such information to RDNs.

Below we have outlined the existing degree of information separation between the NTS and the DNs and the separation measures that NGT proposes in order to remove the potential for undue discrimination in this area.

Although substantially separate from an operational perspective, as an integrated transmission and distribution company, Transco currently has no requirement for information separation. Some incidental information separation exists where, for example, employees do not have access to certain systems because the information is not required in order to perform their job. Obviously, there has not been to date any deliberate information separation, as there has been no need for this. Recognising that this is a new requirement, arising from network sales, NGT has considered in some detail what the requirement will be and how this will be achieved.

2.1 Current access to information systems

An initial review of the set of systems that are currently shared between NTS and the DNs has been completed. Based on this review, approximately 20 systems have been identified which are used jointly by these entities. This list of systems is attached hereto as Appendix 1 and contains a description of the systems as well as an assessment of their potential for undue discrimination, based on:

- whether the information on the system is made available equally to RDNs and IDNs, and
- whether the information could confer an undue competitive advantage on the RDNs.

The attached list illustrates that:

- Access to most of the systems would not confer an undue competitive advantage on the RDNs or NTS;
- Many of the systems do not hold any commercially sensitive information;
- NGT will continue to provide the IDNs access to many of these systems under the proposed Front Office Managed Service Agreement (FOMSA) for a period of 18 months after completion of the sale, at which time IDNs are expected to migrate onto their own systems. The FOMSA exit arrangements will ensure that IDNs have enduring access to all relevant data;
- There are also a number of smaller applications that hold asset data and attributes used for HSE and regulatory compliance and copies of these are used in NTS and DNs. It is proposed that copies of these will be shared with all DNs and NTS.

2.2 Proposed level of incremental information separation

Our review has also found 4 systems areas where work is envisaged to remove the potential for undue discrimination between RDNs and IDNs:

- SAP/SAP Offline Systems – because NTS and DNs are currently part of one legal entity, current back office systems are shared between NTS and the DNs. It is proposed that NTS back office data will be separated from RDN data in a similar way to that proposed for the IDNs and to separate out NTS data from the offline back-office systems.

- Desktop and Shared Drive Areas – this is currently shared across NGT. It is proposed that NTS and RDN shared storage areas be segregated and appropriate access restrictions implemented.
- HPMIS – a database holding high pressure metering site and quality data. It is proposed that access to commercially sensitive data is restricted to the DN to which it relates
- Intranet – Both NTS and RDNs will have access to NGT’s corporate Intranet. Restrictions to commercially sensitive areas will be applied to NTS and RDN users.

2.3 Employees who have access to commercially sensitive information on the NTS / DN interface

Recognising that network sales creates a new human interface between NTS and DN, in addition to addressing access to IS systems (above), NGT also proposes to implement a Code of Conduct, which will restrict the communication of information from NTS to all DNs. This Code of Conduct would apply to all NTS employees who operate at the NTS/DN interface (which is a small group of people) and to all ‘support services’ staff that are shared between NTS and RDNs, and would be reinforced with guidance, briefings and a robust compliance regime. The focus of the code will be on instilling non-discriminatory behaviours in all aspects of employment and emphasising the particular need to operate to agreed protocols on what information can be communicated, to who and at what times.

Transco has in the past demonstrated successful implementation of such Codes of Conduct, for example with the separation of supply and distribution.

2.4 Impact of rule and market based solutions

An important consideration in identifying business separation arrangements is the extent to which other solutions remove or reduce the concern that is being addressed. The Offtake arrangements RIA considers various proposals for offtake arrangements and diurnal storage and the “preferred” solution for each would remove most of the concerns of undue discrimination by reducing the potential for NTS to discriminate at the planning or investment stage. The extent of separation proposed should be set after taking account of other mitigation actions.

3 Operational Separation

There is a substantial degree of organisational and operational separation in place today between Transmission and Distribution, which has existed since the merger between NGC and Lattice in 2002. In particular:

- They each have a separate CEO and separate Directors who are responsible for all core business activities;
- All staff, with the exception of support functions (outlined above) are operationally and organisationally aligned to one of the two businesses;
- Each entity is planned and operated as a separate entity.

There are a number of non-core functions or “support” services that are shared, as this provides the most efficient platform for delivery under the current NGT structure. These support services are set out below (they exclude services provided by the corporate centre such as tax, treasury, audit, public affairs, investor relations, etc.).

3.1 Support functions shared between NTS and distribution

Below is an overview of support services and a description of the services they provide.

Shared support function	Outline of service
Finance	<ul style="list-style-type: none"> Claims Handling Banking Services and Controls (incl. set up of new contractors in SAP) Purchase to Pay – Procurement Purchase to Pay – Accounts Payable Debt collection process Miscellaneous Billing Public Liability Claims Handling Employers Liability Claims Handling Company Property Claims Handling Management of Motor Own Damage Claims Motor Third Party Claims Management General Claims Handling Placement of Insurance Period End Routines Central Journals SAP Processes
Procurement & Logistics	<ul style="list-style-type: none"> Procurement planning Tender processes Post tender negotiations/contract award Contract management and implementation Supplier contact Logistics services Stock Management Material and other requests Fleet management commercial vehicles / services Management of company car scheme
Legal	<ul style="list-style-type: none"> General litigation, employment litigation, and dispute resolution Legal support for commercial and construction agreements Property advice Gas industry agreements and uniform network code Competition, regulation and procurement Health Safety and Environment New road and street works act Intellectual property
Regulation	<ul style="list-style-type: none"> Project and operational support Regulatory support Compliance support Regulatory Operations, co-ordination & communication
NGT UK Property	<ul style="list-style-type: none"> Facilities management Repair and maintenance of company office premises Estates management
Human Resources	<ul style="list-style-type: none"> General HR services HR consultancy services Learning and development
Communications	<ul style="list-style-type: none"> External Communications Internal Communications
Information Systems	<ul style="list-style-type: none"> Back office system support services Data centre and application servers Application management Help desk Security management
Safety, Health and Environment (SHE)	<ul style="list-style-type: none"> SHE strategy / standards SHE support SHE Assurance SHE Performance SHE contacts

It can be seen from the above that support services are ‘indirect’ support and not surprisingly therefore, support services staff in most cases see very little commercially sensitive information and not for example the kinds of operational information about NTS and DN’s that would be germane to offtake arrangements.

Recognising however, that network sales introduces a step change from the existing company structure and to address any residual concerns that support services staff have access to some information about NTS and RDNs in order to perform their duties, NGT expects to apply the Code of Conduct to Support Services staff requiring that NTS and RDN information is used only for the purpose of providing the service and is not communicated to any other part of the company. In practice many of these functions are professional or quasi professional in nature where part of the job requires a high degree of observance of confidentiality (particularly lawyers, accountants, human resources professionals and communications experts) and a high degree of integrity on confidentiality can be expected.

In addition all support services staff would continue to be governed by existing Licence conditions, which will encourage appropriate conduct in areas such as not sharing commercial information and cost allocations.

NGT has also considered services that NTS and DN provide to each other and these are considered below.

3.2 Services provided between NTS and DN businesses

There are a limited number of areas where NTS and RDNs do and to a lesser extent will continue to provide services to each other. The table below summarises these activities, and defines how these will be treated following network sales.

Directorate	Description of Activity for/from DN	Measures ensuring no undue discrimination
Commercial	UKT assists DN in generating demand forecasts	None: data not sensitive: summarised in Ten Year Statement
Engineering Services	DNs conduct UKT pipeline maintenance	Transfer function (and staff) to UKT
	DNs maintain full offtakes at UKT direct connects	None in long term: benefit is economies of scale. In short term, service continues from iDNs under contract
	UKT provides Pipeline Maintenance Centre services to DN	None in long term: benefit is economies of scale. In medium term, service provision to iDNs continues under contract
	DNs provide first line emergency service for UKT public reported escapes	Licence conditions will ensure continuation of uniform national model
	DNs provide third-party enquiry (site plans) service to UKT	None: benefit is economies of scale. Will continue for RDNs only.
Network Strategy	UKT project-manages certain DN transmission pipeline construction projects	None: project management skills available in the open market. UKT will consider request to continue service provision to iDNs for projects already underway.
	UKT provides physical capacity to DN at NTS/DN offtakes	Offtake arrangements (see RIA)
Operations and Trading	UKT performs remote daily operation of DN from Area Control Centres	SOMSA for iDNs; RDNs treated similarly; each DN sets own operating philosophy
	UKT purchases shrinkage gas for DN	None: benefit is economies of scale. Will continue for RDNs only.
	UKT and UKD liaise at the NTS/DN boundary	Offtake arrangements (see RIA)
	UKT performs role of NEC	None: required for safety. NEC safety case likely to perpetuate current arrangements
	UKT conducts Energy Balancing	Enshrine in Uniform Network Code as UKT role
	UKT allocates consumption to Very Large Daily Metered Connections	Enshrine in Uniform Network Code as UKT role
	UKT supports certain processes for Scottish Independent Undertakings	Transfer LNG capacity booking function to Scotland DN; others functions largely execution-only and provided under Scotland SOMSA
Finance	UKT handles recharges relating to services to/from DN	Mechanistic process in accordance with Licence condition
	UKD Finance handles general ledger & statutory accounts for Transco plc	Align with corporate structure
	UKD Finance handles income accounting for Transco plc	Align with corporate structure
	UKD Finance handles preparation, regulatory filings and audit for Transco plc	Align with corporate structure
	UKD Finance handles monthly cost allocation of shared services	Mechanistic process using Ofgem-audited transaction model and in accordance with Licence condition

The above table illustrates that:

- Many of the services provided between NTS and DNs are non-sensitive and should not raise any concerns for undue discrimination: they are mostly the result of NGT aiming to perform work on the most efficient basis;
- Existing Licence conditions and the proposed regulatory and commercial framework (UNC, Offtake Code) will in most cases provide a robust framework for removing potential risks of undue discrimination;
- In other cases NGT is proposing to adopt additional measures to prevent undue discrimination including the application of transparent arrangements (e.g. SOMSA), the transfer of staff, offer of service provision to IDNs and implementation of the Code of Conduct where appropriate.

4 Existing separation of office accommodation and costs of further separation

In view of the fairly high degree of separation in organisational design, employees are almost invariably grouped in areas that are dedicated to NTS, distribution or support services. However, as there is currently no requirement to do so, there has been no intentional access controlled segregation of employees within NGT buildings.

The table below provides an overview of the four offices that are currently shared by NTS and Distribution staff. It indicates the numbers of staff from the DNs, NTS and support functions in each and also states what functions they are performing so that the degree of sensitivity can be observed.

Shared Building / Location	Allocation of seats and key functions by building (as at June 2004)					
	Key UKD functions	No of UKD staff	Key UKT functions	No of UKT staff	Key Support functions	No of support staff
HOC, Hinckley	Call Centre & Despatch Network Strategy Safety & Engineering	597	Operations+Trading Network Strategy Commercial Engineering Services	287	Comms, HR, IS Transactions	479
Norgas House, Killingworth	Call Centre & Despatch	391	Area Control Centre	33	Finance, Comms, HR, IS, Legal	295
Glevum House, Gloucester	Call Centre & Despatch	334	Area Control Centre	40	Comms, HR, IS, Legal Procurement and Logistics	21
NGT House, Warwick	Network Strategy Safety & Engineering Finance Construction Operations	205	Eng Services Operations+Trading Network Strategy Commercial Finance	831	Comms, HR, IS, Legal Regulation Procurement and Logistics Transactions	330

A few observations can be made on the above table:

- Transco is currently planning to consolidate its three Area Control Centres and relocate them to HOC Hinckley by Q2 2006: at such time Distribution will no longer share the Killingworth and Gloucester sites with NTS. It should also be observed that the Distribution staff in both sites are involved in call centre and work dispatch activities which should not raise any concerns for undue discrimination;
- This effectively leaves two buildings that will be shared by NTS and DNs, namely the Hinckley and Warwick sites. In assessing the implications of physical separation, we have therefore focused on these buildings only. We are currently doing further work to

understand the current level of separation between the relevant departments in each of those 2 sites, which is actually focused on a relatively small group of people in Operations & Trading and Network Strategy.

The impact of further physical separation would involve either of the following:

- restricting access to NTS and DN staff in different parts of the above buildings (e.g. through separate security access to different parts of the buildings); or
- separate buildings for NTS and DN staff.

Based on an initial analysis, we have estimated the property related costs for the Hinckley and Warwick offices for each of the above options. A comprehensive property restructuring study would need to be undertaken to develop a full picture of the feasibility, cost and timescales of physical separation.

Physical separation option	Upfront property costs	Annual operating property costs	Notes
Physical barriers within existing buildings	£2m	£1m p.a.	<ul style="list-style-type: none"> • Upfront costs include partitions, security access, and minor IS related relocation costs. • Operating costs include incremental property rental costs resulting from sub-optimum utilisation of existing property.
Separate buildings	£4-5m	£2-3m p.a.	<ul style="list-style-type: none"> • Upfront costs include staff relocation costs, minor IS related relocation costs, and preparation of new office space. • Operating costs include incremental property rental costs resulting from sub-optimum utilisation of existing property.

Additional costs not included in the above

In addition to the property related costs outlined above, a number of additional costs will be triggered if physical separation were required. Further work is required to quantify these. These costs would apply under both physical separation options although a significantly higher cost is likely to be incurred under the separate buildings option:

- Additional upfront costs would be incurred in the following areas:
 - Major building modifications such air conditioning to suit the new offices layout;
 - Major work associated with re-configuring desktops, network and telephony configurations and IT networks;
 - Costs associated with losing and re-hiring staff that choose not to relocate (mainly applicable to separate buildings option)
- Currently office space is designed in a way that recognises work and communication patterns between support functions and the core business departments. If physical separation is introduced, additional operational inefficiencies are likely to be introduced (especially if separate buildings are required), as important support functions such as finance, HR, legal and regulation risk being physically removed from some of their key customers.

5 Shared Costs

It has been suggested that there might be an opportunity for NGT to allocate shared costs to NTS rather than its RDN business and by doing so, enhance the performance of its RDN business. It is not clear that there is any incentive to do this since costs inefficiently incurred by NTS would not be allowed. Further, this is not something that NGT is allowed to do under existing licence conditions and in any event, the licence requires that any change in the allocation of costs triggers notification to Ofgem.

Summary

NGT has put significant effort into assessing the current degree of business separation between transmission and distribution and scoping the work that will be required to address the potential for undue discrimination following network sales.

As set out above, information, organisation and physical separation have been considered and adequate measures proposed.

Business separation should only be undertaken where there are significant risks and there are inadequate alternative controls. This is on the basis that business separation can create significant direct costs in addition to the indirect consequences arising from the disruption of efficient working practices. Business separation measures should therefore be in response to a clearly defined problem and must be carefully targeted, proportionate and fit for purpose.

Appendix 1 : List of systems currently shared between NTS and distribution

Applications	Description	NTS-DN Usage (How Shared)	Type of Data	Sensitivity of Data	Separation activity required	Proposed Separation Changes
CPBASE (ARES)	A standalone PC based system designed to aid the collection, storage and monitoring of data relating to Cathodically Protected pipelines. This system is required by Transco to comply with ECP1	NTS and all DNs get access to all the data. NTS does not enter data into this system, but can look at historical records. Used primarily by corrosion experts.	Historical cathodic protection readings.	Not commercially sensitive	No	No specific action will be required: equal treatment for access will be given to iDNs and rDNs post network sales: iDNs will be provided a copy of CPBASE
Desktop Environment	NGT will be rolling out a new desktop infrastructure between Q4 2004 and Q2 2005. The current desktop infrastructure is common throughout Transco and there are also common shared file storage areas, with potentially some information shared between NTS and the DNs.	Common NGT desktop used in NTS and all DNs, with some common shared areas.	Desktop and Shared Areas	Potentially commercially sensitive	Yes	NTS-DN desktop configuration access will need to be changed to 'ring-fence' NTS and restrict access to iDN/rDN data. This will involve some user data migration. Assuming that this can be accommodated within current desktop rollout plan and will be delivered by Q2 2005.
GL5	GL5 handles the raising & monitoring of all repair and modifications to all plant & equipment covered by the Pressure Systems Safety Regulations and produces GL5 documentation. It needs to be retained to ensure compliance to the pressure systems safety regulations.	Data are not shared between NTS and DNs.	Pressure Systems data GL5 Documentation	Not commercially sensitive	No	No action required.
Graphical Falcon (gF)	A network analysis tool used by gas engineers to simulate steady state and long-term transient effects on high pressure gas transmission systems. It allows users to create and modify models of gas	Tool is used by DNs and NTS. iDNs will be given access under the FOMSA.	Network analysis and modelling data	Commercially Sensitive but all DNs have equal rights	No	No action required. iDNS/rDNs will be provided equal access under the FOMSA. Arrangements for enduring access/functionality will be finalised as part of transition planning with iDNs.
GTMS/IGMS	Used in the monitoring and control of the physical gas network. Also known as Area Gas Management System. GTMS access is limited to System Operations and DNs only, via dedicated terminals. GTMS is to be replaced by iGMS in a phased approach by Q3 2005.	GTMS/iGMS terminals located in DN offices. All DNs will have equal access in line with SOMSA. Once IGMS is installed all DNs will see data relevant to their own DN.	Network Control data across DNs	Possibly Commercially Sensitive but all DNs are treated equally under SOMSA	No	No action required. All DNs to be treated equally in line with SOMSA.
HPMIS (High Pressure Metering Information System)	Compliance d/b of all high pressure metering sites giving gas quality information. Contains audit info about the installed equipment at each site including metering accuracy uncertainty analysis and metering design for FWACV charging policies.	Database used by DNs, National and Area Control Centres, System Operations and NTS. iDNs will be given access under FOMSA.	High Pressure Meter Sites, Gas Quality Information, and CV data	Potentially some commercially sensitive data	Yes	Equal iDN/rDN access to be provided under the terms of FOMSA. Some additional security access restrictions may be required to ensure separation of iDN/rDN data. Alternatively an upgrade of the infrastructure may be required to provide security restrictions.
Internet/ Intranet	NGT corporate Intranet currently accessible by all NGT staff.	NTS and DNs all have access to corporate Intranet	Internal company communications and information	Potentially some commercially sensitive data	Yes	Minor configuration changes required to restrict access to certain 'sensitive' Intranet sites
Landowner Database	A number of standalone databases holding owner, occupier and land details. It includes compensation details to be able to comply with covenants in deeds of easement and Maint 5.	Technically not shared - all DNs have copy of this spreadsheet.	Land Ownership Details	Not commercially sensitive	No	NTS, iDNs and rDNs will be provided copies of the database.
MAPS	MAPS reads data from ESRI and outputs it graphically.	NTS and all DNs have equal access to the data. iDNs will be given system access under FOMSA. Map digitisation service to be provided to iDNs under separate agreement.	Digitised maps via EDMS	Not commercially sensitive	No	No action required: iDNS/rDNs will be provided equal access in line with FOMSA. Arrangements for enduring access/functionality will be finalised as part of transition planning with iDNs.

Applications	Description	NTS-DN Usage (How Shared)	Type of Data	Sensitivity of Data	Separation activity required	Proposed Separation Changes
MIMS v4.3	Asset repository holding above ground and >7 bar Transco assets data. System is used to maintain asset data, create maintenance schedule for each asset and work orders for all the assets at different time intervals defined by the maintenance schedule. NTS pipeline and AGI data remain in MIMS.	NTS and all DNs have equal access. IDNs will be given access under FOMSA.	Above ground installations and >7bar pipeline assets Work Schedules Job data	Not commercially sensitive	No	No action required: iDNS/RDNs will be provided equal access in line with FOMSA. Arrangements for enduring access/functionality will be finalised as part of transition planning negotiations with iDNs.
Operational Data Store	ODS is a management reporting system for the production of operational reports for Network Code and the calculation of liabilities to Shippers. The Data warehouse system requires inputs from several other systems including AT Link, Sites & Meters Database and SC95.	NTS and all DNs have equal access to the data.	Extracts of data from UK-Link Systems (e.g. Sites & Meter, AT-Link, SC95 plus others).	Potentially some commercially sensitive data but held within Xserve.	No	Changes to Business Object used to access ODS will restrict access by DN.
Pressure Systems DB (PSDB)	PSDB holds all installations and relevant component parts that require examinations under PSSR, schedules when examinations are due and completed examinations data.	Standalone database, data not shared between NTS/DNs.	Pressure Systems data	Not commercially sensitive	No	No specific action will be required. iDNs will be provided a copy of PSDB as part of network sales.
PSR (Pipeline Safety Regulation) Notification	This database records details of all Transco >7 bar pipelines (pressure, diameter, stress levels etc.) for the purposes of notifying the HSE as part of pipeline safety regulations.	NTS and all DNs have equal access to the data. IDNs are given access under FOMSA.	Pipeline safety regulation reports	Not commercially sensitive	No	No action required: iDNS/rDNs will be provided equal access in line with FOMSA. Arrangements for enduring access/functionality will be finalised as part of transition planning with iDNs.
QB-MARS / Network Services	A mobile work management and field working solution used by Network Service for asset related NTS jobs are administered manually on the whole with the exception of some emergency jobs passed through QB-MARS.	NTS and all DNs have equal access. IDNs will be given access under FOMSA.	Work management and job data	Not commercially sensitive	No	No changes required, since NTS jobs handled manually or through QB-MARS in the case of emergency. QB-MARS is to be provided under FOMSA to all iDNs. Arrangements for enduring access/functionality will be finalised as part of transition planning negotiations with iDNs.
SAP	Transco's backoffice system used for HR, Finance, Procurement and Logistics across Transmission and DNs. Includes some related applications such as ESSBASE (budgeting / forecasting), Hyperion (consolidation of reports)	Backoffice systems shared across NGT	Information related to HR, Financials, Procurement and Stores Mgt are handled for NTS and DNs in this single SAP system	Commercially Sensitive	Yes	NTS back-office data will be separated from RDN data by having separate NTS data in a similar way to that proposed for the IDNs.
SAP Offline Systems	A number of offline backoffice systems are used for both NTS and DNs	Backoffice systems shared across NGT	Financial, Procurement, HR data	Potentially some commercially sensitive data	Yes	Migration of NTS specific data out of offline systems. iDN/rDN data is being separated as part of Network Sales changes.
SRP (Surveillance Reporting for Pipelines)	SRP holds data regarding potential 3rd party interference and other sources of damage for the entire Transco pipeline network, including NTS and LTS, which are routinely patrolled by helicopters.	NTS and all DNs have equal access to the data. IDNs will be given system access under FOMSA.	Ordnance survey data NTS and LTS pipeline data	Not commercially sensitive	No	No action required: iDNS/RDNs will be provided equal access in line with FOMSA. Arrangements for enduring access/functionality will be finalised as part of transition planning with iDNs.
THESIS	A repository for recording and reporting on health and safety incidents and near misses. Required by Transco's HS&E. H&S data not to be shared between iDNs/rDNs.	NTS and all DNs have equal access to the data. Assumption is that iDNs will maintain their own health and safety incident reporting tools.	Health and Safety Incident data	Not commercially sensitive	No	No action required as iDNs will have their own incident reporting systems.
TPFD (Transmission Pipeline Fault Database).	This database holds locations and nature of reported faults on pipes 7-80 bar, as well as basic data on pipeline assets.	Not a shared system, but a service provided by Advantica. This service will continue to be available on request to all DNs post sale.	Fault and damage data	Not commercially sensitive	No	No action required. RDNs and IDNs will have access to this service from Advantica on request.