

Dear Mr Hodgart,

GISG (Gas Industry Safety Group) has set out below its response to the Ofgem Consultation "Initial thoughts on the reform of interruption arrangements on gas distribution networks".

GISG's primary interest is in gas safety and details of our role and membership etc. can be found at [www.gisg.org.uk](http://www.gisg.org.uk)

Much of the consultation document lies in the sphere of commercial / contractual arrangements and we do not propose to comment on these per se but rather to make three observations.

1. Ofgem in setting the scene regarding interruption arrangements makes no mention of the need for Transporters to be able to exercise Emergency Interruption. Such action is sometimes necessary to safeguard the Network and ensure public safety in the event of a potential or actual gas emergency whether it is at a very local level or at national or sub national level. We assume Ofgem do not intend to curtail such measures.
2. There is an implication within the consultation document, perhaps unintended e.g. para. 2.13 that security of supply can be achieved by simply having the right investment signals in terms of capacity of the network. Capacity in itself does not of course ensure security of supply – ensuring enough gas is offered into the network to achieve the supply / demand balance is what achieves security. Failing that then interruption and firm load shedding come into play.
3. GISG is concerned that the modification of the current interruptible regime may result in less interruptible gas overall. While in the commercial context this may be quite a good thing on balance, if the level of interruptible gas is lower this could result in precipitating a gas emergency i.e. invoking firm load shedding that much sooner in the course of an emergency or potential emergency.

We look forward to the next stage of the consultation process and would of course welcome a direct response to the points above.

Please do not hesitate to make contact should you wish to discuss any aspect of our comments above.

Yours sincerely

David Wilson  
Director  
GISG

Tel 01234 214199  
E-mail [david.wilson@gisg.org.uk](mailto:david.wilson@gisg.org.uk)  
[www.gisg.org.uk](http://www.gisg.org.uk)