

GSMR and gas supply emergencies – a view from HSE

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Ofgem Gas Contingencies seminar 13
October 2006

Gas Safety (Management) Regulations 1996



Enacted following HSC/DTI report 'Britain's Gas Supply: A safety Framework' (1995)

Criminal law NOT civil

A permissioning, safety case regime – low frequency high consequence events.

Key objective – to minimise the risk of a gas supply emergency (loss of pressure endangering people) – from occurring or continuing.

Aimed at safety – risk from gas - not security of supply or the wider social and economic issues.

Immediate risk or longer term e.g. later in a winter.

GSMR Safety Cases

- Gas conveyor safety cases
 - Set out arrangements for minimising the risk of a supply emergency in their network.
- NEC safety case – sets out arrangements for coordinating actions to minimise risk of a supply emergency where there is more than one conveyor on the network.
- Safety cases have to be accepted by HSE, including material changes.
- Gas conveyors and NEC have legal duty to follow their safety case.

GSMR - protecting consumers

- GSMR requires ALL consumers to be protected
 - industrial and domestic – but particularly aimed at the most vulnerable consumers (e.g. domestic)
- How? By maintaining safe pressure OR safely isolating consumers
 - Safely isolating certain consumers whilst maintaining safe pressure in the rest of the network is not a supply emergency – and is a key strategy in the safety cases.

GSMR - Co-operation

- Consumers, Shippers, Storage operators and others have a statutory legal responsibility to co-operate 'so far as is necessary' with gas conveyors and the NEC in discharging their duty.
- You need to understand what is expected of you and have arrangements to discharge those duties.
- If you don't know by now what is expected of you, find out. Should be set out in clear working arrangements.

Co-operation - example

- A gas conveyor may direct a consumer to stop using gas to avoid a supply emergency developing or if one develops, to minimise the impact.
- That duty is absolute.
- Therefore if instructed to stop using gas, you must do it – or you will be in breach a statutory obligation and will be open to enforcement action, including prosecution
- [Emergency contact leaflet]

Co-operation - example

National Grid, NEC and other Distribution Network operators need accurate contact information. Shippers, suppliers and major consumers have a key role in providing accurate, up-to-date information.

Industrial consumers need to ensure they have arrangements in place to stop using gas when directed to do so. This includes management and practical arrangements.

Co-operation



- To avoid a gas supply emergency, all industry players need to act quickly and safely
- Can be achieved only by working together
- Effective co-operation requires proactive action by you.
- You can't ignore the laws of physics – to maintain safe pressure – supply = demand. Therefore if not enough supplies, there has to be a demand side response.

GSMR safety monitor arrangements in the safety case



- Aimed at ensuring there is sufficient gas retained in storage to minimise the risk of a supply emergency in a 1 in 50 cold winter.
- To ensure that throughout the winter the network remains at a safe pressure – if not appliances don't work safely – risk of CO poisoning, fire and explosion).
- Part of both National Grid's, the DN's and NEC safety cases.

GSMR safety monitor arrangements in the safety case



- Large industrial users ‘protected by isolation’. Safely isolating consumers is not a supply emergency.
- Domestic and embedded consumers (those difficult to isolate safely and in a timely manner) – protected by gas in storage.
- The safety monitor levels are a backstop when all other arrangements have failed to deliver.
- And they are there to protect the most vulnerable and ensure public safety.

Consequences

- Hopefully we won't get into a position of a gas deficit.
- But if we do – opportunities to minimise the impact.
- BUT the consequences of getting it wrong are serious – National Grid, other DN operators and NEC will not let the network become unsafe and will have no choice but to cut gas supplies to domestic consumers if necessary.
- It is all our interests to avoid that.

