
United Kingdom Onshore Pipeline Operators' Association

Comments on the Impact Assessment for Testing of Pipeline Emergency Plans

- Page 3 Para 5 UKOPA's recommendation has always been that pipeline emergency plans should be tested through table top exercises, and that tests should be carried out across large geographic areas in order to test interface and communication issues. UKOPA does not support live testing for pipeline emergency plans.
- Page 4 Para 8 In most cases LAs develop pipeline emergency plans for each pipeline operator, and therefore can hold multiple pipeline emergency plans.
- Page 4 Para 11 This option does not state the method of testing, this is required in order to identify the costs.
- Page 5 Para 14 The assumption that 366 LAs will result in 366 emergency plans is incorrect, the number of pipeline emergency plans is much higher. (see Para 8)
- Page 5 Para 15 The assumption for the 30 year period is not explained, this does not relate to the pipeline life.
- Page 5 Para 17 PSR place a legislative requirement on the pipeline owner to maintain pipeline integrity. PSR requires Operators to "Notify" new pipelines to HSE
- Page 5 Para 18 UKOPA assumes this refers to the provision of information to LAs for the development of pipeline emergency plans, not duties associated with notification.
- Page 5 Para 19 Explanation of this failure rate assumption is requested, it does not align with operational data.
- Page 5 Para 20 Explanation of the assumed effectiveness level is requested.
- Page 5 Para 22 Explanation of the assumed effectiveness level is requested.
- Page 5 Para 24 The annual pipeline failure rate used in this calculation is incorrect.
- Page 6 Para 27 The basis for the assumed depreciation on the emergency plan effectiveness is not clear, explanation is requested.

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Page 6 Para 30-36 The probability of failure rate is incorrect, other assumptions and the basis for are not clear, further explanation and justification is requested.

Page 7 Para 37-45 The costs used in the assessment are incorrect and do not reflect current rates.

Page 8 Para 46 The costs provided by National Grid are agreed by UKOPA as representative, they are not an upper bound and should be used in the impact assessment. Supporting information can be supplied. If they are not used, why was information from pipeline operator's requested?

Page 8 Para 49 There will be significant impact upon the regulated gas industry, which must be discussed with the economic regulator.

Page 8 Para 50 Additional research should be specified and the data to be obtained and used understood by all parties. It is unclear how the impact assessment can provide the justification for any recommended option if it is considered uncertain by HSE.

Page 8 Para 51

- i) Pipeline failure rate data is sparse, but is published, understood and accepted for use in risk assessments, safety cases and safety justifications.
- ii) While UKOPA has provided input to the Impact Assessment, data supplied has not been used (ref para 46).