



# Review of MDL Interconnection Arrangements

December 2009







## **About Gas Industry Co.**

Gas Industry Co was formed to be the co-regulator under the Gas Act.

As such, its role is to:

- recommend arrangements, including rules and regulations where appropriate, which improve:
  - the operation of gas markets;
  - access to infrastructure; and
  - consumer outcomes;
- administer, oversee compliance with, and review such arrangements; and
- report regularly to the Minister of Energy and Resources on the performance and present state of the New Zealand gas industry, and the achievement of Government's policy objectives for the gas sector.

## **Authorship**

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# 1

## Background

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The Gas Act 1992 (Gas Act) and the April 2008 Government Policy Statement on Gas Governance (GPS) provide for the development of arrangements that provide access to gas transmission pipelines on reasonable terms and conditions. The ability for parties such as gas producers, network owners, or end-users to physically interconnect with pipelines is an intrinsic element of such access.

Gas Industry Co's 2006 review of transmission access issues identified a number of concerns relating to interconnection with transmission pipelines. In response to these issues Gas Industry Co developed the Interconnection Guidelines (Guidelines) which set out its view of good interconnection practice that would meet the objectives of the Gas Act and GPS. The Guidelines, released in February 2009, proposed principles, procedures, documentation requirements, and arrangements for addressing disputes.

Although the Guidelines have no legal standing, Gas Industry Co intends that Transmission System Owners (TSOs) should use them to develop their interconnection services. It is also intended that parties seeking interconnection will use them as an indication of what to expect from a good practice interconnection service. The arrangements described in the Guidelines are not the only way in which a pipeline owner might satisfy the requirements of the Gas Act and GPS, but they do lay out a comprehensive and structured way to provide interconnection with transmission pipeline on reasonable terms and conditions.

Gas Industry Co undertook to monitor the effectiveness of these Guidelines in influencing the interconnection services offered by TSOs. The initial review was conducted in September 2009 and focused on documented processes and documentation associated with new interconnections.

In relation to MDL, Gas Industry Co met with MDL representatives on 10 September 2009 to discuss the form of MDL's interconnection arrangements.

The findings and recommendations of the review are summarised in section 4.

# 2

## Review process

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Gas Industry Co has found the TSOs' response to the Guidelines to be slow but well intentioned. However, both pipeline owners have acknowledged that they have further work to do on their interconnection arrangements, and Gas Industry Co believes that additional time should be allowed for that to occur. In the mean time, the following analysis considers how current arrangements differ from the arrangements proposed by the Guidelines. This does not necessarily mean that they do not meet the Gas Act and GPS objectives, but does show where further analysis is required.

It is proposed that a further review will be conducted in June 2010 where we will assess whether the interconnection services offered meet the Gas Act and GPS objectives. If they do not, we will consider other options for improvement, including recommending rules or regulations to the Associate Minister of Energy and Resources.



# 3

## Interconnection activity during review period

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This section contains commercially confidential information and has been removed for the purposes of publication.

# 4

## Review of MDL documented processes

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A review of MDL's interconnection related documents was conducted to determine the level of alignment with the Guidelines. The objective of the review was to identify misalignments and to assess whether these were material from a policy objectives perspective.

The following documents were provided by MDL for review:

- Maui Pipeline Operating Code (MPOC);
- Agreement for the Establishment of a New Welded Point on the Maui Pipeline (the ICEA);
- Process and Authorisations for New Interconnections with the Maui Pipeline (the Process);
- MDL Instructions to Commercial Operator on Procedure for New Interconnection with the Maui Pipeline (the CO Instructions);
- Agreement for Interconnection with the Maui Pipeline (the ICA);
- New Interconnection Form; and

The 'Agreement for the Establishment of a New Welded Point on the Maui Pipeline' is broadly aligned with the ICEA (refer to section 4.11), and is referred to in this review as the ICEA.

### Interconnection Policy

#### What the Guidelines say

Each TSO shall publish an interconnection policy that shall include details of their interconnection process, information requirements, pro-forma contracts, policies and standards, technical review principles, commercial prerequisites and a dispute resolution process.

## **What the MDL documents say**

MDL does not have a specific interconnection policy; however, many aspects of the policy are addressed in other MDL documents. These include:

### **MPOC**

- Welded Party Agreement Form (ICA)
- Technical and metering requirements and standards
- General open access principles and prerequisites for new interconnecting parties

### **Process and Authorisations for New Interconnections with the Maui Pipeline**

- Outline of the process steps
- Reference to the New Welded Point Agreement
- Role of the Technical Operator in the technical review
- Approvals and hold points

### **Agreement for the Establishment of a new Welded Point on the Maui Pipeline**

- Terms and conditions for the design construction and testing of new interconnection points
- Land requirements
- Costs and payments
- Indemnity and insurance
- Termination
- Confidentiality
- Dispute resolution

## **Gas Industry Co assessment**

While most aspects of a policy are addressed in existing documents, an overarching interconnection policy would provide greater process transparency. The existing documents clearly anticipate new receipt point interconnections and do not fully address the requirements of a delivery point interconnection. The interconnection policy should provide guidance in respect to delivery point interconnections.

MDL has advised that it intends to prepare an interconnection policy in line with the Guidelines that will consolidate its existing documents and expand on areas not adequately addressed.

## **Dispute Resolution**

### **What the Guidelines say**

The Guidelines recommend that TSOs include a dispute resolution process as part of their interconnection arrangements, and that offering access to the Rulings Panel would be a suitable default option. Dispute processes could then be based on those contained in the Gas Governance (Compliance) Regulations 2008.

### **What the MDL documents say**

The ICEA includes a dispute resolution process that allows either party to refer the dispute to an independent expert (agreed or appointed by the Chairman of IPENZ). There is no dispute resolution process for matters that arise prior to entering into an ICEA.

### **Gas Industry Co assessment**

Although MDL's dispute resolution process does not offer dispute resolution through the Rulings Panel, its dispute resolution procedure does appear to be reasonable. However, it does not address Gas Industry Co's concern about pre-contractual disputes.

The dispute resolution process described in sections 3.2 and 3.3 of the Guidelines is intended to provide an efficient means of preventing road blocks and protracted disputes about issues that occur prior to the parties entering into an interconnection agreement. This is an important means of ensuring that a TSO's contractual terms and conditions are not an unreasonable barrier to interconnection. Equally, the process would provide the TSO with a means of resolving any unjustified claim by an Interconnecting Party (IP) that the TSO has applied unreasonable terms.

Consequently, MDL's interconnection policy should provide a means for parties seeking interconnection to raise disputes, and to have them resolved in a timely and economic manner before the ICEA (or ICA) has been executed.

## **Technical & Metering Standards**

### **What the Guidelines say**

The TSO may specify the requirements for the following interconnection equipment:

- metering equipment, including gas analyser and all related instrumentation;

- SCADA equipment and interfaces;
- filtration and liquid removal systems;
- pressure control and protection equipment;
- odourisation equipment;
- interconnection 'T' (eg hot tap) and isolation valve;
- electrical and cathodic protection isolation equipment; and
- other equipment specified in the interconnection policy.

### **What the MDL documents say**

Schedule 1 of the MPOC provides a reasonably comprehensive list of acceptable standards, applicable Regulations, and design features with which station metering and telemetry must comply.

### **Gas Industry Co assessment**

In respect of technical and metering standards, the MPOC is well aligned with the Guidelines. It is noted that the MPOC is now five years old and some aspects, especially metering technology, may need to be reviewed and updated.

## **Pre-existing Interconnections**

### **What the Guidelines say**

Where the arrangements associated with a pre-existing interconnection are not covered by an ICA, or where the existing ICA does not fully address the requirements of these Guidelines, the interconnecting parties should establish an ICA or amend their existing ICA accordingly.

### **What the MDL documents say**

All MDL interconnections are covered by the MPOC and ICAs.

### **Gas Industry Co assessment**

Since all MDL interconnections are already covered by an ICA, this section of the Guidelines does not apply.

## **Pipeline Capacity**

### **What the Guidelines say**

An ICA does not confer rights to transmission capacity and may be negotiated independently of transportation arrangements. In certain circumstances, as detailed in the TSO's interconnection policy, the TSO may require the ICA and transportation arrangements to be negotiated co-dependently.

### **What the MDL documents say**

The MPOC has no interdependence between new interconnections and pipeline capacity or Shipper agreements.

### **Gas Industry Co assessment**

MDL's arrangements are well aligned with the Guidelines. It is not clear what approach MDL would take if an ICA was sought for a quantity of gas that could not be transported. This situation should be addressed in the interconnection policy.

## **Equipment Ownership**

### **What the Guidelines say**

The TSO will have sole discretion in respect of the ownership of the physical connection 'T', and primary isolation valve, including the pipe work from the transmission pipeline up to the isolation valve.

Ownership of the remaining interconnection equipment will be agreed between the parties. The TSO is not obliged to own or provide this equipment, but the Interconnection Party (IP) can elect to own this equipment. The Guidelines also recognise that the industry norm is for the IP to own receipt stations and for the TSO to own delivery stations.

### **What the MDL documents say**

The MDL documentation does not provide ownership options and is geared towards a receipt point interconnection. The basis of the ICEA is that the IP is responsible for the design and installation of all equipment, including the hot tap, and will pay MDL all costs and expenses incurred in relation to the construction.

Ownership of the hot tap and first isolation valve is not mentioned, but it is understood that MDL considers these assets to belong to MDL (ownership transfer is not covered by the agreement).

## **Gas Industry Co assessment**

One objective of the Guidelines is to provide flexibility to an IP in respect to ownership and the means of cost recovery. MDL's documents provide little (if any) flexibility. Future interconnections will, however, almost certainly be receipt points, where the cost of the interconnection is small compared to the costs associated with establishing a gas field and production station. In this context, the up-front cost of a receipt point interconnection station is not considered to be a material barrier to entry.

MDL should, however, consider its approach to a new delivery point interconnection and address the options in their interconnection policy.

## **Cost Recovery**

### **What the Guidelines say**

Prior to entering into any contract, the TSO may recover the costs it incurs in performing its technical review of an interconnection application, providing such costs are first discussed and agreed by the parties.

The cost allocation methodology detailed in the ICEA should provide for the IP to reimburse reasonable costs incurred by the TSO. This includes the cost to review the detailed design, modify the existing pipeline certificate of fitness, obtain authorisation amendments, and any costs associated with land and easement changes. The parties may agree to include cost recovery for the design and construction phases in an ongoing interconnection fee.

In establishing an ICEA or ICA, parties shall meet their own contract negotiating costs.

The TSO is not required to accept conditions that would require it to incur operating costs unless it is fully compensated for that cost.

### **What the MDL documents say**

MDL's New Interconnection Form specifies that all costs and expenses incurred by MDL in assessing, processing, and responding to the Application, including all costs and expenses charged to MDL by its technical and legal advisers, shall be paid by the applicant. The form does not include a schedule of rates.

The standard ICEA specifies that the new IP shall pay MDL all costs and expenses incurred by MDL in relation to the construction, including third party fees such as legal, technical adviser, and insurance costs.

## **Gas Industry Co assessment**

MDL's processes are consistent with the Guidelines.

## **Application Process**

### **What the Guidelines say**

The TSO should provide a full set of application documents (or have them available for downloading).

The IP should provide a completed application form to the TSO, who should acknowledge the application within five (5) days and confirm whether the application is materially complete within 15 days. Once the application is materially complete, the TSO shall carry out a technical review of the application within 25 days.

The TSO should notify the IP of the outcome of the technical review and, if rejected, the reasons for the rejection. If the IP considers the reasons for rejection to be inadequate, it can initiate the dispute resolution process.

### **What the MDL documents say**

MDL provides a standard application form and Process document on its website. The form is designed to apply to receipt and delivery points but does not include details about the delivery pressure.

The desired term of ICA is not included in the application but is addressed in the MPOC.

On receipt of the completed form, the CO (on behalf of MDL) provides the standard ICEA to the IP. The Process document does not address the contract negotiation process or any process for dispute resolution associated with the ICEA negotiation.

## **Gas Industry Co assessment**

The Process document generally complies with the Guidelines, but would be clearer if the steps and timeframes for the receipt of the New Interconnection Form, preliminary technical review, and ICEA were provided in more detail.

The Process document should detail the process for accepting or rejecting the New Interconnection Form and include reference to a dispute resolution process.



## **Planning Process**

### **What the Guidelines say**

Having successfully completed the application phase the parties should meet to agree responsibility for the ownership, design, and construction.

The TSO and IP should develop a project plan assigning responsibilities for design and construction work between the parties.

### **What the MDL documents say**

There is no specific planning phase described in the MDL documents, although aspects of the planning process are addressed in the New Interconnection Form (contact details and target dates for construction and gas flow).

### **Gas Industry Co assessment**

MDL's planning process would be more transparent if the planning steps outlined in the Guidelines were included in the MDL's interconnection policy. However, it is noted that the Guidelines address the more complex ownership and demarcation issues that could arise at a network delivery point, which is not anticipated on the MDL pipeline.

## **Contract Negotiation**

### **What the Guidelines say**

In respect of scope, the ICEA covers the design, construction, and commissioning of a new interconnection point, and the ICA covers the ongoing (post-commissioning) arrangements. For (contractually) simple interconnections, the ICEA may not be warranted and the provisions may be incorporated into the ICA.

In negotiating the ICEA and ICA, the TSO and IP should agree a timetable and sequence for negotiation and advise each other of their contacts for the negotiation. The ICA negotiation may be conducted in parallel with the ICEA negotiation, following agreement of the ICEA or after completion of the design phase.

In certain circumstances (described in the interconnection policy), the TSO may require the ICA and transportation arrangements to be negotiated together.

### **What the MDL documents say**

The contract negotiation process is not described in detail, but the Process document states that the IP will be provided with an ICEA following the receipt of a completed New Interconnection Form.

The ICA is simply an agreement to the terms and conditions in the MPOC and is executed on completion of the commissioning and various technical approvals. There appears to be no scope for special conditions to apply to the ICA, and transportation arrangements are fully separated from Welded Parties arrangements.

### **Gas Industry Co assessment**

The process is generally aligned with the Guidelines but does not incorporate the level of flexibility described in the Guidelines. This may be due to the prescriptive nature of the MPOC. It is also reflective of the likelihood that a new interconnection would be a Receipt Welded Point where the IP is responsible for all the interconnection equipment.

It seems unlikely that a new 'network' delivery point will be required on the MDL pipeline, and on that basis, it is reasonable for MDL to have receipt point centric processes. However, it would improve clarity if the MDL interconnection policy addressed how a delivery point application would be dealt with.

## **ICEA**

### **What the Guidelines say**

An ICEA should include the scope of work, standards and specifications, and commercial provisions in respect of design, construction, and commissioning.

The IP should indemnify the TSO, up to a reasonable amount, for its direct and indirect liability associated with the new interconnection. The TSO may require the IP to provide insurance cover equal to the value of the indemnity. The scope of the indemnity should include failure of hot tap operations, off-specification gas, and excess pressure.

### **What the MDL documents say**

The ICEA covers most of the aspects described in the Guidelines. Some aspects, such as technical and metering standards, are covered through reference to the MPOC.

The contract is construed on the basis that the IP will be responsible for all the interconnection equipment, including the hot tap, and that all costs incurred by MDL will be met by the IP.

The IP is required to indemnify MDL for any loss, damage, or liability that may arise from construction, testing, and commissioning. The limit of this indemnity is NZ\$100 million. Insurance is required for the term of the agreement, which expires once MDL has issued a Final Approval Letter.

The ICEA defines the sequence and preconditions for most milestones, and defines some time limits.

### **Gas Industry Co assessment**

The ICEA is generally well aligned with the Guidelines, but is clearly constructed to suit a receipt point interconnection where the IP is responsible for all the interconnection equipment and for the hot tap operation. The rationale for this approach seems reasonable since new delivery point interconnections are not expected. It would improve clarity if the MDL interconnection policy addressed how a delivery point application would be addressed.

For a receipt point IP, the liability and cost of insurance imposed by MDL will be small relative to what the IP faces in establishing a gas field and production station. In this context, it is not considered to be a material barrier to interconnection.

The liability limit of NZ\$100million appears high but MDL advised that it is was established after a detailed risk assessment by an industry expert. Gas Industry Co may wish to review this when progress on interconnection is next reviewed.

## **ICA**

### **What the Guidelines say**

An ICA should include commercial terms and conditions and the ongoing operational performance standards and specifications. The ICA should cover:

- Contract period
- Prices
- Interruptions, emergencies, and curtailment
- Confidentiality
- Force majeure
- Liability and indemnity
- Prudential requirements
- Land ownership and access

- Dispute resolution
- Ownership demarcation including any transfer of assets
- Injection rates
- Meter testing and correction details should be included
- Obligations and liabilities of the parties for gas quality
- Odourisation (where required) and testing of odourant levels
- Information transfer including SCADA
- Pressure requirements, limits and protection
- Termination and abandonment

### **What the MDL documents say**

The ICA is a simple agreement referencing the terms and conditions described in the MPOC.

The MPOC addresses most aspects prescribed in the Guidelines. The aspects not covered are abandonment, asset ownership demarcation, maximum injection or delivery rates, and odourisation requirements.

### **Gas Industry Co assessment**

The ICA and MPOC are generally well aligned with the Guidelines, but are clearly constructed to suit a receipt point interconnection where the IP is responsible for all the interconnection equipment. The issues of abandonment, maximum injection rates, and ownership demarcation would not apply in this situation, since the IP is responsible for the design, and odourisation is currently not required on the Maui pipeline.

It would improve clarity if the MDL interconnection policy addressed the approach for a delivery point interconnection.

## **Design Process**

### **What the Guidelines say**

Unless otherwise agreed, each party is responsible for the detailed design and statutory approval of the assets it owns. The Guidelines recognise that certain assets are critical to the TSO (the 'TSO specified assets') and gives the TSO the right to approve the design of these assets.

Unless the IP has no design responsibility (that is, all design and construction is the responsibility of the TSO), the TSO will specify a design review agent.

The IP should issue preliminary design details covering design parameters and high level plant details. Once approved by the TSO's review agent, the IP provides the detailed design for approval including, as applicable, the hot tap, station, metering, SCADA, and lateral design.

The TSO assesses the effect of the new interconnection, considering factors such as the risk to the existing pipeline from over-pressure and internal corrosion, the operability of the system, and any new threats to above-ground assets.

The TSO also approves the procedures and the qualifications of the party contracted to perform the interconnection.

For a delivery point interconnection, the TSO and the owner of the downstream equipment agree the pressure control and protection scheme.

The TSO prepares a report giving either approval, subject to conditions, or rejection, including details of design aspects that do not meet the specified standards within 25 business days of receipt of design packages.

Each equipment owner is responsible for obtaining approval from the relevant Certifying Authority for its equipment.

The owner of the station provides the information, as required by the System Operator, to enable the interconnection point to be mapped into OATIS.

### **What the MDL documents say**

The Process document requires the IP to provide design documentation, a risk management plan and construction procedures, and a letter of assurance that the design complies with the MPOC. MDL's TO reviews the documentation and provides the CO with a letter of assurance confirming the capability, experience, and competence for each party that the IP has engaged, and that they are satisfied for the construction to proceed in accordance with the documentation. There is a provision for preparatory work to be carried out prior to all requirements being met.

### **Gas Industry Co assessment**

The MDL documents provide a good process outline, but only limited guidance in respect of content and time frames. It is understood that the detailed design process is, in practice, agreed between MDL and the IP.

MDL's Process document would have greater transparency if it included more detailed process steps as outlined in the Guidelines.

## **Construction, Testing, and Commissioning**

### **What the Guidelines say**

Construction of the TSO specified assets may not begin until the Certifying Authority and the TSO have approved the design.

Where the IP has constructed a new lateral, the TSO has the right to inspect the pipeline cleanliness before the pipeline is put into service.

The TSO will approve the contractor responsible for installing the hot tap. Notice of any hot tap work should be given to the System Operator at least one month before the work starts. The party responsible for the hot tap is responsible for coordinating inspection activities with the Certifying Authority.

Where the IP is responsible for constructing the interconnection station, the TSO may make site construction inspections at agreed hold points for the TSO specified assets.

Where the IP owns 'TSO specified assets', the commissioning procedures is subject to approval by the TSO.

The primary isolation valve will remain closed until the TSO is satisfied that all necessary commissioning tests have been completed and approval has been obtained from the System Operator. Once the primary isolation valve has been opened, the interconnection equipment is deemed to be live.

Any gas injected or withdrawn from the pipeline during commissioning is subject to the requirements of the MPOC or VTC (as applicable) and should be metered.

### **What the MDL documents say**

The Process document specifies that the TO will inspect the new station/ interconnection point and metering, and issue a written confirmation that the equipment complies with the MPOC. The TO also provides a certificate from the Certifying Authority, proving that the modifications comply with the Health and Safety in Employment (Pipelines) Regulations. Once the CO has received these items, it will execute an ICA with the IP. There is provision for executing an ICA with some outstanding works. Once all outstanding matters have been completed, MDL issues a Final Approval Letter (which terminates the ICEA).

The ICEA describes a more detailed process covering testing and addressing the specific requirements where the testing includes injecting gas into the Maui pipeline. There is some minor misalignment between the Process document and the ICEA.

### **Gas Industry Co assessment**

The MDL processes are generally aligned with the Guidelines, although it was noted that there was some misalignment between the Process document and the ICEA that should be resolved.

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## Summary and recommendations

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MDL's interconnection documents are generally well aligned with the Interconnection Guidelines. Its suite of documents has evolved over time and, as a consequence, has some minor inconsistencies. The most significant omission is an interconnection policy, which would provide an overall framework for the process and improve the transparency. MDL has advised its intention to prepare a draft interconnection policy this calendar year.

It is recommended that the interconnection policy includes a dispute resolution process in line with sections 3.2 and 3.3 of the Guidelines. Such a dispute resolution process would provide an efficient means of preventing road blocks and protracted disputes about issues that occur prior to the parties entering into an agreement.

While MDL's New Interconnection Form allows for receipt or delivery point interconnections, the documents are clearly geared towards a receipt point where the IP owns the interconnection station, is responsible for the hot tap design and installation, and reimburses all MDL's costs as a lump sum. Consequently, the documents are not well suited to a new delivery point interconnection application from, say, a gas network company. Such a request is unlikely given the location of the Maui pipeline. Consequently, it does not seem unreasonable for MDL to have receipt-centric interconnection processes and documentation. It is nevertheless recommended that MDL provides high level delivery point interconnection principles in their interconnection policy.

The design review processes and timetable can be based on industry feedback, a source of confusion and frustration. The MDL process documents are quite brief in this respect and it is recommended that further detail and indicative time-lines are included.

A summary of the review finding is tabulated below.

<b>Guideline Item</b>	<b>Gas Industry Co Comment &amp; Recommendation</b>
Interconnection policy	MDL has no policy document although most aspects are addressed in other documentation. MDL has indicated its intention to prepare an interconnection policy by the end of the year.
Dispute resolution	Issues arising prior to entering into a contract with MDL are not addressed. MDL should incorporate a pre-contract dispute resolution process in its interconnection policy.



<b>Guideline Item</b>	<b>Gas Industry Co Comment &amp; Recommendation</b>
ICEA	MDL's standard agreement is generally well aligned with the Guidelines but is intended for a receipt point interconnection. The interconnection policy should address the principles and approach that would be taken for a delivery point.
ICA	Jointly, the ICA & MPOC are reasonably well aligned with the Guidelines, but are oriented towards a receipt point interconnection. The interconnection policy should address the principles and approach that would be taken for a delivery point interconnection.
Technical and metering standards	The technical and metering standards contained within the MPOC are well aligned with the Guidelines.
Pipeline capacity	MDL's documented processes treat interconnections and capacity independently and are well aligned with the Guidelines.
Equipment ownership	MDL's documentation does not reflect the ownership options envisaged in the Guidelines because they are primarily intended for receipt point interconnections. The interconnection policy should address the principles and approach that would be taken for a delivery point.
Cost recovery	MDL's documented processes are well aligned with the Guidelines.
Application process	MDL's documented processes are reasonably well aligned with the Guidelines. It is recommended that MDL clarifies the steps and time frame for dealing with new interconnection requests.
Planning process	MDL does not have a documented planning process. It is recommended that the interconnection policy describes a planning process consistent with the Guidelines.
Contract negotiation	MDL does not have a documented contract negotiation process. It is recommended that the interconnection policy describes the contract negotiation process including the approach for delivery point interconnection points.
Design process	MDL's documented processes are generally well aligned with the Guidelines, but would benefit from greater detail.
Construction, testing and commissioning	MDL's documented processes are generally well aligned with the Guidelines.

