

Stage 01: Modification

0518:

Enhancement to the Gas Safety (Installation & Use) Regulations process

At what stage is this document in the process?



This modification seeks to implement a Shipper report identifying sites where meters have been removed 6 months previously to aid with the GS(I&U)R process and enhance metering data quality

The Proposer recommends that this modification should be:



- subject to self-governance
- assessed by a Workgroup



High Impact:
None



Medium Impact:
Shippers & Transporters



Low Impact:
None

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About this document:

This modification will be presented by the proposer to the panel on 20 November 2014.

The panel will consider the proposer's recommendation and agree whether this modification should be:

- subject to self-governance; and
- referred to a workgroup for assessment.


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1 Summary

Is this a Self-Governance Modification?

Scotia Gas Networks (SGN) believes that this modification should be considered as Self Governance as the modification is simply producing a report which is unlikely to have a material effect on consumers or competition.

Is this a Fast Track Self-Governance Modification?

Fast Track Self-Governance is not appropriate as this modification is not properly a housekeeping modification required as a result of some error or factual change.

Why Change?

The Gas Safety (Installation & Use) Regulations (GS(I&U)R) require services to be left in a safe condition following a meter removal, an obligation, which Transporters carry out on behalf of suppliers. As part of this Transporter process desktop checks are undertaken to ensure sites, which have already been disconnected, wish to use gas in future or which have meters on site are taken out of the process prior to site visits commencing. Through desktop checks Transporters regularly find sites with meters attached where data processing issues have occurred. By ensuring that shippers have an opportunity to review the lists of sites prior to any Transporter activity the GS(I&U)R process can be streamlined, correct data errors earlier and minimise the customer impact.

Solution

A report is to be issued to Shippers containing sites with meters removed 6 months previously. Shippers will have 30 days to investigate the sites contained and report back to the Transporters where meters are identified on site. Where meters are found these will enter into the process implemented by UNC MOD0424 and MOD0425 and be removed from future Transporter GS(I&U)R reports.

Relevant Objectives

As this modification aims to introduce a process, which will enhance the metering data quality in Xoserve's systems this can be seen to further competition between suppliers as enhanced metering data quality is key to the change of supplier process for customers (relevant objective d).

Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

Does this modification affect the Nexus delivery, if so, how?

This modification has no impact on Nexus delivery.

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2 Why Change?

When a gas meter is removed Regulation 16(3) of the Gas Safety (Installation & Use) Regulations 1998, (GS(I&U)R) places requirements on the person who last supplied gas through the meter to ensure that the supply is left safe if no new meter has been installed 12 months after the initial meter removal. This regulation was introduced to minimise the risk associated with live redundant gas service pipes being left in properties. The Gas Supplier has a duty to comply with these Regulations. Although Transporters do not have a direct obligation under GS(I&U)R they discharge the suppliers obligation in line with their own under the Pipeline Safety Regulations (PSR).

Transporters extract reports from Xoserve at around 9 months after the meter removal, which are processed and then site visits commence after 12 months from meter removal.

As part of the GS(I&U)R Transporter processes desk-top checks and customer communications will be carried out. This is done to eliminate sites which either have already been disconnected through alternative means, where the customer wishes to use gas in future or sites which have incorrectly been included in the reported sites e.g. where the meter is still on site but administration/process errors have lead to the meter removal on the system.

Recently UNC Modifications 0424 and 0425 have been approved which address the sites where meters are found following a Transporter GS(I&U)R visit or desk-top activity to ensure that the MPRNs are registered back to the relevant shipper who was involved in the meter found. Although this will ensure that the registrations and settlements are corrected it does still mean that unnecessary desk-top processes have to be carried out by Transporters prior to arranging site visits to identify these sites. This can also mean that a customer receives potentially unnecessary communication from the Transporter stating that their gas supply will be disconnected when they are still using gas with a supply contract in place.

SGN are proposing the below solution for a number of reasons:

1. To ensure that the GS(I&U)R processes are as streamlined as possible
2. To give Shippers an opportunity to address data errors early on
3. To reduce Transporter administration around the GS(I&U)R process
4. To minimise the impact on customers

SGN are proposing that an additional report direct to Shippers is created and sent around 6 months following a meter removal to allow them to take early action.

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3 Solution

Business Rules:

- A report will be sent to each User on a monthly basis showing Meter Point Reference Numbers (MPRNs) and addresses of Supply Meter Points where a Supply Meter was notified to the Transporter as being removed 6 months previous and no other Supply Meter has since been installed. This will be sent both for MPRNs still in the Users ownership and for ones where the User has withdrawn from the site (Shipperless).
- Users will be obligated to scrutinise the report through whatever means possible (system interrogation and customer communication) and where they find evidence of the same Supply Meter as identified by the Meter Serial Number still on site and connected to the Transporters' system and capable of flowing gas or another Supply Meter fitted by approval of their associated supplier they will inform the Transporter of this fact.
- Shippers will provide full Meter Information to Transporters for all Supply Points where evidence of a meter connected to the Transporters system and capable of flowing gas was found. Where Meter Information cannot be provided by the Registered User or previous Registered User and a site visit is required to verify the circumstances, these will progress through the normal GSR route and the Registered User or Previous Registered user will be liable for Transporter site visit charges.
- Users will have 30 calendar days to carry out relevant investigations and provide a response to the Transporter
- The response will show the relevant MPRN and associated address along with the Meter Information of the Supply Meter found on site. The Meter Information should include: date of meter fit (if known), relevant asset reading details, relevant asset details (serial number, manufacturer, model, year of manufacture, and location) and for meter assets: metric/imperial indicator, meter type, number of dials and conversion basis for converter assets.
- Where a Supply Meter is identified as being connected to the Transporters System and capable of flowing gas the principles of UNC TPD Section G 3.7 (as implemented by MOD0424 and MOD0425) shall apply. This included shipper confirmation/registration, meter asset attachment and Transporter auto-confirmation.
- Any sites identified through this process as having a Supply Meter connected to the Transporters system and capable of flowing gas shall be removed from upcoming Transporter GS(I&U)R reports

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User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

This modification is considered to be User Pays as it aims to produce a new report, which would be considered as a new User Pays service.

Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.

100% Shipper User - apportioned by LDZ supply point share at the date the report is produced, excluding CSEPs.

Proposed charge(s) for application of User Pays charges to Shippers.

tbc

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

tbc

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4 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

As this modification aims to introduce a process, which will enhance the metering data quality in Xoserve's systems this can be seen to further competition between suppliers as enhanced metering data quality is key to the change of supplier process for customers (relevant objective d).

5 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

6 Legal Text

Legal text will be completed once the modification is sufficiently developed

7 Recommendation

The Proposer invites the Panel to:

- Determine that this modification should be subject to self-governance; and
- Progress to Workgroup assessment