

0526:

Identification of Supply Meter Point pressure tier

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

Aims to improve the communication of the Supply Meter Point Pressure Tier by the Gas Transporter (GT) to the Shipper/Supplier/MAM



The Workgroup recommends that this modification should be returned to Workgroup for further assessment.



High Impact:
None



Medium Impact:
Transporters



Low Impact:
Shippers, Suppliers and MAMs

Contents		 Any questions?
1 Summary	3	Contact: Code Administrator
2 Why Change?	4	 enquiries@gasgovernance.co.uk
3 Solution	5	 0121 288 2107
4 Relevant Objectives	6	Proposer: Colette Baldwin
5 Implementation	7	 Colette.baldwin@eonenergy.com
6 Impacts	8	 02476 181382
7 Legal Text	8	Licence Holder: Northern Gas Networks
8 Recommendation	8	 jferguson@northerngas.co.uk
About this document:		Systems Provider: Xoserve
This report will be presented to the panel on 19 November 2015.		 commercial.enquiries@xoserve.com
The panel will consider whether the modification should proceed to consultation or be returned to the workgroup for further assessment.		Additional contacts: Tom Chevalier
The Workgroup recommends the following timetable:		 Tom.Chevalier@PowerDataAssociates.com
Initial consideration by Workgroup	26 February 2015	 01525 862870
Amended Modification considered by Workgroup	TBA	
Workgroup Report presented to Panel	19 November 2015	
Returned to Workgroup for further assessment	19 November 2015	
Workgroup Report presented to Panel	18 February 2015	
Draft Modification Report issued for consultation	18 February 2015	
Consultation Close-out for representations	10 March 2015	
Final Modification Report published for Panel	11 March 2015	
UNC Modification Panel decision	17 March 2015	

1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is not a self-governance modification because it is likely to have a material impact on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

Is this a Fast Track Self-Governance Modification?

Fast-Track Self Governance is not proposed as the modification would not meet the self-governance criteria and is not properly a housekeeping modification.

Why Change?

Shippers/Suppliers/Meter Asset Managers (MAM) requires knowledge of the Pressure Tier applicable to a specific MPRN to ensure they send the appropriate skilled staff with the correct metering equipment. Currently, this information can be obtained by specific enquiry of the Gas Transporter (GT) using the GT1 procedures¹. The GT1 procedure is manual and time-consuming for the enquirer and the GT who has to respond.

Solution

Interim solution, prior to implementation into NEXUS:

GTs are required to publish an electronic list of the relevant pressure tier applicable to the MPRNs on their network and to make it available to relevant industry parties, Shippers/Suppliers/MAMs. The list should be refreshed on a regular basis (e.g. monthly or quarterly).

Post a solution implemented into Nexus:

GTs are required to populate and maintain a field in the central systems accessible to Shippers/Suppliers and MAMs to identify the Pressure Tier applicable to each MPRN on their network. Shippers/Suppliers/MAMs can then enquire of the central system directly to obtain the information. This information would be continuously updated by GTs.

Relevant Objectives

The existing GT1 procedure is manual, labour intensive and time-consuming for the enquirer and the GT. Recording the information centrally so that relevant stakeholders can obtain the data directly will be more efficient; it will reduce the need for GTs to resource the process and enable Users to obtain the information directly. This should result in lower on-going operational costs for GTs and will improve the timeliness of access to the data and ensure that shippers/suppliers or MAMs can ensure that relevant, suitably trained staff (with appropriate equipment) attend site.

Implementation

Implementation costs are not available at this stage.

No implementation timescales are proposed as an implementation date depends on GT and Xoserve development timescale. Recognising the NEXUS implementation timescale it is proposed to provide an interim solution prior to implementation into a phased NEXUS release.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

¹ www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

No. There are no Significant Code Review impacts, and the enduring solution requires a system delivery of the solution only post Nexus implementation and therefore shouldn't detrimentally impact any existing industry changes.

2 Why Change?

Insert text here The Supply Meter Point Pressure Tier is not currently stored and communicated in industry data flows. On specific request of the GT, using forms defined by GT procedures², the Supply Meter Point pressure tier will be provided for a MPRN. The MAM requires knowledge of the Supply Meter Point pressure so that they can send appropriately trained staff, with the appropriate equipment, to complete the intended metering work. Sending the wrong person results in abortive work and a frustrated customer and in the worst case inappropriate work.

It is impractical for the MAM to send, or for the GT to respond, to multiple requests using the current forms. In theory the MAM could submit a request in advance of every metering task, although this is more likely on sites where the MAM anticipates an elevated pressure. Historically, whether to submit a GT1 request may have been based on local knowledge. This local knowledge has effectively been lost as companies operate on a national basis. Dependent on the risk that the parties wish to take, in the extreme, this could lead to every MAM submitting a GT1 in advance of all meter work, with the resulting administrative burden on GT & Supplier/MAM. The forthcoming roll-out of smart metering will require visits to ~20m premises. In principle a GT1 could be submitted in advance of work at each of these sites.

Association of Meter Operator (AMO) members have indicated that in the domestic sector the aborted visits are in the order of 1 in 1000 visits, which over the life of the smart meter roll-out could equate to 25,000 aborted calls, with the associated cost and customer frustration. In the I&C sector this figure is higher, a member operating in this sector has aborted 5% of their meter exchange visits when they attended site to find the installation to be MP or IP.

Sending a meter operative with the incorrect training and equipment for the Supply Meter Point Pressure Tier will generally lead to an aborted visit, a frustrated customer, wasted costs and delayed completion of the planned work. In the worst scenario, it could lead to inappropriate work, which would lead to a safety incident with all the consequential impact on GT, Shipper, Supplier, MAM, Customer and members of the public. The Health and Safety Executive (HSE) have highlighted at MAM Code of Practice (MAMCOP) situations where inappropriate work has been performed.

The Gas Safety (Management) Regulations 1996, Regulation 6(8)³ state:

“...A person who conveys gas in a network shall, where he is requested to do so by a person proposing to carry out work in relation to a gas fitting, provide him with information about the operating pressures of the gas at the outlet of a service pipe. ...”

“gas fittings” means gas pipework, valves, regulators and meters, and fittings, apparatus and appliances...

Subsequent changes to Review of Gas Metering Arrangements (RGMA) will need to be considered to enable parties to communicate the data items between GT/Shipper/Supplier & MAM) utilising industry data flows.

² www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

³ www.legislation.gov.uk/ukSI/1996/551/regulation/6/made

3 Solution

Proposed Enduring Solution

There is currently no specific data item on the Xoserve systems to store the pressure level.

GT1 lists the pressures as: “LP, MP35, MP65, MP105, MP180, MP270, IP and other”. It is proposed that a supply point data item of ‘Supply Meter Point Pressure Tier’ be defined with a valid set as:

- LP
- MP35
- MP65
- MP105
- MP180
- MP270
- IP
- Other (not one of the other valid set)

And for interim period to allow time for GTs to update the data:

- Unknown
- Not LP

It is acknowledged that some GTs may not have perfect historic records; nevertheless some believe they have reasonable records. So it is proposed that all new connections should have their pressure level captured and stored centrally. All pressure enquiries resulting in the production of a GT1 document should be capable of having their pressure updated onto a central system. We believe that GTs are as keen as other stakeholders to ensure the records are correct, making the data more easily accessible will reduce the opportunity for error, reduce paperwork exchanges of GT1 forms, and reduce duplicate work as a result of subsequent GT1 requests.

The GT1 procedure can also be used, as now, to gain any additional information for those sites where it is of value.

The GTs and their Agency would need to develop a process to provide this information and to update or amend as appropriate. Consideration should also be given to how Shippers (and Suppliers/MAMs) would be notified by the Transporter Agency if the data was changed.

Any genuine engineered changes of the ‘Supply Meter Point Pressure Tier’ at a site will require dialog between the GT & MAM in advance of the work being undertaken to ensure the work to change the pressures are co-ordinated at site. It is not envisaged that updating the central systems will be an appropriate communication for this infrequent operational activity.

Nothing in this proposal would remove the parties’ obligation to check the actual pressure at site prior to commencing work. The existing operational safety activities would remain to minimise the opportunity of error.

If a MAM believed that the information provided was incorrect, then they should report this to the GT with any supporting evidence, and the GT should review its records, advise the MAM and update the central records.

As part of the data gathering stage MAMs may be willing to provide their records of pressure tier to the GTs to assist the GTs to review and ensure their records are as complete as possible.

Interim Solution

Until Nexus is delivered it is proposed that an interim solution be implemented as soon as practicable, which can be phased if necessary.

The interim solution would require the GTs to produce an electronic listing (e.g. CSV file) of MPRN and 'Supply Meter Point Pressure Tier' for each MPRN which is not low pressure (to limit the volume of data). This would be refreshed on a regular frequency so that updated and additional data can be communicated in a timely manner. The frequency is anticipated to be monthly but at least not less than quarterly. The listing should be made available to Suppliers/Shippers/MAMs.

Stakeholders may still initiate a GT1 procedure for everything not LP prior to planned meter work.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	It is envisaged that changes to the Transporter computer systems will be required, however as this facilitates the more effective delivery of the transporter licence conditions, the proposer believes the funding of this should be met in full by the Gas Transporters under User Pays, funded by Transporters in full.
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.	<i>To be confirmed.</i>
Proposed charge(s) for application of User Pays charges to Shippers.	<i>To be confirmed.</i>
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	<i>To be confirmed.</i>

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.	Positive
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.	Positive
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	None

satisfied as respects the availability of gas to their domestic customers.	
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

Objective a), c) The existing GT1 procedure is manual and labour intensive. Recording the information centrally so that relevant stakeholders can obtain the data directly will reduce on-going operational costs for GTs. GTs have an existing duty to respond to requests from parties, historically these requests have been made only where applicants suspect the site may not be low pressure based on local knowledge.

Objective d) Historically, the Shipper/Supplier/MAM may only make a GT1 request when they suspect the connection is not low pressure, this request may have been based on local knowledge, which is increasingly lost as companies operate nationally. Dependent on the risk that the parties wish to assume, in the extreme this could lead to every MAM submitting a GT1 in advance of all meter work, with the resulting administrative burden on GT & Shipper/Supplier/MAM.

Sending a meter operative with the incorrect training and equipment will generally lead to an aborted visit, a frustrated customer, wasted costs and delayed completion of the planned work. In the worst case scenario, it could lead to inappropriate work which would lead to a safety incident with all the consequential impact on GT, Shipper, Supplier, MAM, Customer and members of the public.

Objective a), c) The existing GT1 procedure is manual and labour intensive. Recording the information centrally so that relevant stakeholders can obtain the data directly will reduce on-going operational costs for GTs. GTs have an existing duty to respond to requests from parties, historically these requests have been made only where applicants suspect the site may not be low pressure based on local knowledge.

Objective d) Historically, the Shipper/Supplier/MAM may only make a GT1 request when they suspect the connection is not low pressure, this request may have been based on local knowledge, which is increasingly lost as companies operate nationally. Dependent on the risk that the parties wish to assume, in the extreme this could lead to every MAM submitting a GT1 in advance of all meter work, with the resulting administrative burden on GT & Shipper/Supplier/MAM.

Sending a meter operative with the incorrect training and equipment will generally lead to an aborted visit, a frustrated customer, wasted costs and delayed completion of the planned work. In the worst case scenario, it could lead to inappropriate work which would lead to a safety incident with all the consequential impact on GT, Shipper, Supplier, MAM, Customer and members of the public.

5 Implementation

No implementation timescales are proposed as an implementation date depends on GT and Xoserve development timescale. Recognising the NEXUS implementation timescale it is proposed to provide an interim solution prior to implementation into a phased NEXUS release.

6 Impacts

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No. There are no Significant Code Review impacts, and the enduring solution requires a system delivery of the solution only post Nexus implementation and therefore shouldn't detrimentally impact any existing industry changes.

Pre-Nexus Implementation

The modification proposes a pre and post Nexus solution. The system changes being made only post Nexus, and an interim pre-Nexus spreadsheet requirement.

Nexus Implementation

The changes propose no amendments to the existing requirements for the Nexus Go-Live design.

Post Nexus Implementation

Yes, the changes require amendment to central systems to include an additional data item. Given that the design for Nexus is base-lined it is believed that it will only be possible to implement this post Go-Live and we are open to discuss a suitable implementation date when the system impacts are fully understood.

7 Legal Text

Text Commentary

In support of the legal text provided, the legal representative shall provide a plain English explanatory note setting out the approach taken to converting the Solution into legal text, illustrating how the legal text delivers the intent of the Solution.

Insert text here

Text

The following Text has been prepared by Northern Gas Networks, and no issues were raised by the Workgroup regarding its content.

8 Recommendation

The Workgroup invites the Panel to:

- AGREE that this modification should be returned to Workgroup for further assessment.

The Workgroup notes that Transporters and MAMs have been meeting offline to identify a non UNC solution that could be implemented that would satisfy the requirements set out in this modification. A Workgroup extension has been requested to allow time for the proposer to be satisfied that these requirements can be met outside of the UNC, which would allow them to withdraw this modification.