

**UNC Workgroup 0763R Minutes
Review of Gas Meter By-Pass Arrangements
Thursday 24 June 2021
via Microsoft Teams**

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RHa)	Joint Office (<i>Observer</i>)
Andy Clasper	(AC)	Cadent
Claire Louise Roberts	(CLR)	Scottish Power (<i>0763R Workgroup only</i>)
Claire Manning	(CM)	E.ON Energy
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve (<i>0763R Workgroup only</i>)
Guv Dosanjh	(GD)	Cadent
Jennifer Randall	(JR)	National Grid
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Martin Attwood	(MA)	Xoserve (<i>0763R Workgroup only</i>)
Oorlagh Chapman	(OC)	British Gas
Ryan Prince	(RP)	Xoserve (<i>0763R Workgroup only</i>)
Steve Mulinganie	(SM)	Gazprom Energy
Tom Faulkner	(TF)	Cornwall Insight
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0763/240621>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 October 2021.

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 May 2021)

Minutes from the previous meeting approved.

1.2. Approval of Late Papers

None to approve.

1.3. Review of Outstanding Actions

Action 0501: Q1 Review Question - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period of time and how timely were they).

Update: Ellie Rogers (ER) provided a presentation to provide the Workgroup with an update.

ER provided an overview of the UNC obligation UNC TPD Section M 2.4.4(b) and confirmed that a Consumption Adjustment is only required when a meter By-Pass has been 'closed' and the energy consumed during the period the By-Pass was 'open' was greater than 10,000kWh.

ER further explained that, as there is no requirement for a Shipper to submit a Consumption Adjustment for energy under 10,000kWh, the CDSP are unable to ascertain if an adjustment submission has failed to be submitted or was simply not required.

ER confirmed since November 2020, the CDSP have been manually monitoring all instances of By-Passes being updated from 'open' to 'closed' status and liaising with Shippers to confirm if an adjustment is required or not. As of 22 June 2021, 59 sites had been identified with a closed status and no Consumption Adjustment. Of the 59 sites, 43 responses have been received from Shippers, 41 of which have confirmed an adjustment was not required with 2 confirmed as requiring an adjustment.

ER reported it was difficult to provide a conclusion on the timeliness of the updates.

Martin Attwood (MA) clarified of the 59 sites identified with a closed status and no Consumption Adjustment, most sites did not require an adjustment. He further clarified that of the 41 sites not requiring an adjustment, 29 had a by-pass flag still present in UK Link but physically the by-pass was not present on site and 12 had the flag removed. It was observed in some cases the By-Pass was not present on site and UK link had not been updated. Although there was no evidence of mis-declaring, it was recognised however some data cleansing was required.

MA wished to note that some Consumption Adjustments were quite old and Shippers may not have been submitting the adjustment within the stipulated 15 Supply Point Business Days, but this may be because Shippers were simply not aware of the requirement under UNC Section M 2.4.4(b).

Some analysis could suggest that some transactions are not being processed in a timely manner. It was explained that RGMA transactions should be sent to notify the CDSP of a change in the meter By-Pass status. ER clarified there have been approximately 350 Meter By-Pass status changes which became effective post Nexus and the CDSP are looking to pull information together on the timeliness of these transactions.

ER reported that in February 2021, there were 119 Sites with an open By-Pass, 107 of which have evidence of incrementing reads. This suggested these sites should have been updated to closed. For the same period and the same 119 sites, the earliest effective year was 1960 with the bulk of the effective years being early 1990s. This again suggested updates are not being sent to update the CDSP.

Rebecca Hailes (RHa) suggested any data cleanse should focus on/prioritise the oldest cases first and should consider both open and closed.

The Workgroup discussed the scenario where a meter exchange has taken place and where the exchange may have removed the By-Pass. The Workgroup considered the required investigations and whether a meter exchange engineered out a By-Pass.

MA explained the update for a meter exchange should include an update to the meter By-Pass via the job file submitted.

ER made the following general observations. As of 21 June 2021, there were 12,758 meter By-Passes recorded within UK Link, 12,688 with a closed status and 70 with an open status. For the sites with an open status, in some cases the date refers back to 1960 however this could be a default date.

Steve Mulinganie (SM) enquired if more investigation needed to be done on the 1960 date. MA suggested based on the trends observed, some of the open status flags could be wrong. SM acknowledged that the analysis suggests there are some data issues and some data cleansing work needs to be undertaken.

ER went onto explain that for the sites both with an open or closed status, the premise types do not always line-up with the type of premises which should be considered for a by-pass, such as hospitals, sites with complex pipework, and multi occupied premises.

SM explained that the guidance is not an exclusive list, these are provided as examples. He clarified that there is an engineering decision for sites based on the consequences of not installing a By-Pass. **Closed.**

Action 0502: Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a Consumption Adjustment.

Update: See Action update 0501. **Closed.**

Action 0503: Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAM.

Update: Andy Clasper (AC) reported that over the last 2 years, 61 requests have been submitted, 50 of which were approved. This equated to approximately 2 per month being approved. AC confirmed that the majority of these appear to be hospitals, although some sites had been rejected and these were in some cases for universities, crematoriums, and airports. The reason behind the rejection is not explained in the data he had access to but AC believed the rejection could be based on having a back-up supply. **Closed.**

2.0 Amended Request

The Workgroup considered if a data cleansing exercise would circumvent the need for a Modification. David Addison (DA) agreed that the data cleansing exercise should not need a Modification for Shippers to engage with this.

DA referred to the discussions held last month which considered a number of elements that possibly need Code level obligations. DA referred to examples of de-minimis consumption and the responsibilities of by-pass obligations/requirements.

DA explained where Consumption Adjustments are not required, this data could be wrong, and to give assurance that the process is being managed effectively, he suggested where a meter By-Pass is identified, the process should expect a Consumption Adjustment or confirmation an adjustment is not required. He challenged if adjustments are not required it brings into question why a By-Pass needed to be installed. He suggested that the 1960 date was a default data item and further challenged how long a By-Pass should remain open before it is triggered for a review.

SM suggested for the sites known to have or have had a By-Pass could it be established what the typical expected length of time a By-Pass can be in place for situations such as a meter failure. He asked whether there was a view on what the average length of time should be and what is too long?

DA explained a meter By-Pass can be installed to mitigate a meter failure and for short-term maintenance. DA suggested approaching the MAMs to establish what a sensible period would be for mitigation, suggesting MAMCoP chair could be approached. RH supported obtaining a view of the reasonable period a meter by-pass could be expected to be open.

SM clarified for meter maintenance, periods would be short term, meter failures would be longer term. DA recognised for meter maintenance, a meter By-Pass may be physically opened and closed on that site for just a day, for example to manage pressure loss on the outlet or cleaning filters. He suggested it is unlikely that this would translate to/necessitate changes in the Bypass flag on the systems. It was suggested a meter By-Pass flag may however, still exist on these sites for legitimate reasons (for example it being a hospital).

It was agreed to contact MAMCoP for a view.

New Action 0601: Xoserve (DA) to seek a view from MAMCoP on the typical periods for a Bypass meter to be opened to deal with a meter failure.

SM asked if the Workgroup should review the 10,000kWh adjustment ‘floor’ and if this is de-minimis. He suggested some justification in a monetary value maybe helpful. The Workgroup briefly considered the 10,000kWh would likely be in the region of £250-£300 and anything above 10,000 kWh was believed to be material enough.

Dan Simons (DS) questioned if part of the communication and responsibilities within the process was missing for Consumption Adjustments. DA enquired as to which party is specifically responsible, suggesting this was if this is predominantly the MAM and asked if this is right. It was explained that the MAM should submit a By-Pass request based on the requirements of the site, on an engineering assessment.

DA challenged in light of this, is it justified that the meter By-Pass remains in place for perpetuity, when the Shipper picks up the burden of the by-pass. It was questioned if there is anything around the status of the site, any other data that a shipper may have access to that challenged previous decision made. DA gave an example where a meter By-Pass may be set as open but central systems have incremental reads, suggesting a missed By-Pass status change. The Workgroup considered what reporting may be required, and what action may be required from the CDSP.

AR asked about the Workgroup considering the lifecycle of a meter by-pass. DA explained that there is an obligation to record when a meter By-Pass is opened and to take a reading when opening, he questioned if there is a subsequent reading submitted without a supporting notice that the By-Pass has been closed, should this trigger a report to the Shipper as the read submission suggests the status is wrong and merits investigation. The Workgroup considered if there was a need for an obligation on the CDSP or Shipper to act upon incremental reads and if this would require a UNC change.

DA also questioned if the criteria of sites should warrant further consideration. For example, if a take-away food premises is flagged with a by-pass should this be questioned. SM suggested that the assessment of the engineer should be taken into account, as this may need to consider if such a site may feed associated domestic consumption. Although the data may suggest something odd, this may not necessarily be the case and may need to be investigated further.

3.0 Review Questions

Not discussed.

4.0 Development of Workgroup Report

Deferred.

5.0 Next Steps

Further analysis and end-to-end process discussions to continue at the next meeting.

6.0 Any Other Business

None.

7.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
10:00 Thursday	5pm 14 July 2021	Microsoft Teams	Review of further analysis

22 July 2021			Review of data cleansing requirements Review of potential UNC changes
10:00 Thursday 26 August 2021	TBC	Microsoft Teams	TBC
10:00 Thursday 23 September 2021	TBC	Microsoft Teams	TBC

Action Table (as of 24 June 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0501	27/05/21	1.0	Q1 Review Question - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period of time and how timely were they).	June 2021	Xoserve (DA)	Closed
0502	27/05/21	1.0	Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a Consumption Adjustment.	June 2021	Xoserve (DA)	Closed
0503	27/05/21	1.0	Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAM.	June 2021	Cadent (AC)	Closed
0601	24/06/21	2.0	Xoserve (DA) to seek a view from MAMCoP on the typical periods for a Bypass meter to be opened to deal with a meter failure.	July 2021	Xoserve (DA)	Pending