














# 0526S:

## Identification of Supply Meter Point pressure tier

01	Modification
02	Workgroup Report
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Aims to improve the communication of the Supply Meter Point Pressure Tier by the Gas Transporter (GT) to the Shipper/Supplier/MAM.

	Responses invited by <b>10 June 2016</b> .
	High Impact: None
	Medium Impact: Transporters
	Low Impact: Shippers, Suppliers and Meter Asset Managers (MAMs)

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<b>About this document:</b>		 02476 181382
<p>This Draft Modification Report is issued for consultation responses, at the request of the Panel on 19 May 2016. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.</p> <p>The close-out date for responses is <b>10 June 2016</b>, which should be sent to <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>. A response template, which you may wish to use, is at <a href="http://www.gasgovernance.co.uk/0526">www.gasgovernance.co.uk/0526</a>.</p> <p>The Panel will consider the responses and agree whether or not this self-governance modification should be made.</p>		<p>Licence Holder: <b>Northern Gas Networks</b></p>  <a href="mailto:jferguson@northerngas.co.uk">jferguson@northerngas.co.uk</a>
<b>Modification timetable:</b>		Systems Provider: <b>Xoserve</b>
Initial consideration by Workgroup	26 February 2015	 <a href="mailto:commercial.enquiries@xoserve.com">commercial.enquiries@xoserve.com</a>
Amended Modification considered by Workgroup	28 April 2016	
Workgroup Report presented to Panel	19 May 2016	Additional contacts: <b>Tom Chevalier</b>
Draft Modification Report issued for consultation	19 May 2016	
Consultation Close-out for representations	10 June 2016	 <a href="mailto:Tom.Chevalier@PowerDataAssociates.com">Tom.Chevalier@PowerDataAssociates.com</a>
Final Modification Report published for Panel	13 June 2016	
UNC Modification Panel decision	16 June 2016	 01525 862870

# 1 Summary

## Is this a Self-Governance Modification?

In its initial assessment (19 February 2015) the Modification Panel determined that this was not a self-governance modification as it may have material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

The Workgroup considered that as this modification has been amended and its scope reduced compared to the original, it was now suitable for Self-Governance procedures, as it is simply providing pressure tier information through an alternative route to that currently provided using the GT1 process. The information would be provided at a post code level rather than meter point level, therefore its impact would be immaterial on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

Following reassessment (19 May 2016), the Modification Panel determined that this modification could be now be assigned self-governance status, as there were no material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

## Is this a Fast Track Self-Governance Modification?

This is not a Fast-Track Self Governance modification as it is not a housekeeping modification.

## Why Change?

Shippers/Suppliers/Meter Asset Managers (MAMs) require 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 procedures<sup>1</sup>. The GT1 procedure is manual and time-consuming for the enquirer and the GT who has to respond.

## Solution

Gas Transporters (excluding National Grid NTS) will be required to publish an electronic list of the relevant pressure tier applicable to the MPRNs (including those without a meter attached) on their network by postcode and to make it available to relevant industry parties, Shippers/Suppliers/MAMs. The list should be refreshed on a quarterly basis.

## 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 GT1 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 and therefore further Relevant Objective d).

## Implementation

No implementation timescales are proposed. However, if self-governance procedures were followed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and Transporters systems being available.

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<sup>1</sup> [www.energynetworks.org/gas/regulation/gas-transporter-procedures.html](http://www.energynetworks.org/gas/regulation/gas-transporter-procedures.html)

## 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.

## 2 Why Change?

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 procedures<sup>2</sup>, the Supply Meter Point pressure tier will be provided for a MPRN. Shippers, Suppliers and MAMs require 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 to site 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 and Shipper/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 this at MAM Code of Practice (MAMCOP) situations where inappropriate work has been performed.

The Gas Safety (Management) Regulations 1996, Regulation 6(8)<sup>3</sup> 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...”

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<sup>2</sup> [www.energynetworks.org/gas/regulation/gas-transporter-procedures.html](http://www.energynetworks.org/gas/regulation/gas-transporter-procedures.html)

<sup>3</sup> [www.legislation.gov.uk/ukxi/1996/551/regulation/6/made](http://www.legislation.gov.uk/ukxi/1996/551/regulation/6/made)

## 3 Solution

### Proposed Solution

There is currently no specific data item on the Xoserve systems to store the pressure level. The modification proposes that the Gas Transporters (excluding NTS) create a centrally accessible register of pressure tier by post code, and that it is hosted on the Transporter Agency's website. Access to the register will be made available to UNC parties as well as to Suppliers and Meter Asset Managers, by an appropriate mechanism.

The Gas Transporters will provide portfolio data to the Gas Transporters Agency quarterly:

The portfolio file required is:

File 1: Post code data only. The file will contain the following data items:

- Post code – in and out code;
- Gas Transporter;
- Relevant Pressure Tier (where suspected mixed or unknown pressures, the pressure tier should be mark as 'GT1' – indicating that Users should revert to the GT1 process).

GT1 lists the pressures as: "LP, MP35, MP65, MP105, MP180, MP270, IP and other". It is proposed that at post code level, the Pressure Tier' will be defined as a valid set as follows:

- LP
- MP35
- MP65
- MP105
- MP180
- MP270
- IP
- Mixed
- Unknown

It is acknowledged that some GTs may not have perfect historic records and so the GT1 process will still be required where the GT has mixed pressure tiers within a postcode, or the historical records require verification by GTs desktop exercise or site visits.

It is proposed that data is updated and refreshed quarterly - at the end of February, May, August and November each year. This will result in the data becoming richer over time.

It is believed that GTs are as keen as other stakeholders to ensure the records are correct, so by making the data more easily accessible it 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.

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 have indicated that they 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.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	No system changes are envisaged by this proposal. Since the Proposer believes that the process will result in reduced overall costs for the GTs in avoiding much of the GT1 manual process, then it would be envisaged that the GTs would not seek to recover any costs.
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.	Transporters to fund 100%, as the GT1 process is currently a funded activity.
Proposed charge(s) for application of User Pays charges to Shippers.	None
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	None

## 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

The Workgroup considered that relevant objective d) is further by this modification for the following reasons:

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.

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 and 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.

It should also be noted, that a number of Workgroup participants felt that the modification be more appropriate as a Supply Point Administration Agreement change (SPAA) rather than a UNC change.

## 5 Implementation

No implementation timescales are proposed. The Workgroup noted however, if self-governance procedures were to be followed, then implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and Transporters' systems being available.

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

## 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,

#### Pre-Nexus Implementation

The modification proposes a pre implementation, however the Gas Transporters have indicated that this can be achieved relatively easily and without system development requirements.

#### Nexus Implementation

The changes do not propose amendments to the existing requirements for the Nexus Go-Live design.

#### Post Nexus Implementation

No, the anticipated delivery of this change is within 3 months of a decision, well ahead of Project Nexus Implementation Date.

## 7 Legal Text

### Text Commentary

Text Commentary was not available for Workgroup assessment.

Text Commentary was subsequently provided by Northern Gas Networks as follows:

The text obligates the Transporter (excluding National Grid NTS) to publish the pressure tier data by postcode on a quarterly basis, identifying the pressure tiers outlined in the GT1 document maintained by the Energy Networks Association.

### Text

Text was not available for Workgroup assessment.

Text was subsequently provided by Northern Gas Networks as follows:

#### **TRANSPORTATION PRINCIPAL DOCUMENT**

#### **SECTION V - GENERAL**

Add new Paragraph 5.18

5.18.1 The Transporter (excluding National Grid NTS) shall publish on a quarterly basis by postcode details of the relevant pressure tiers operating within its gas distribution network from time to time.

5.18.2 For the purposes of this paragraph "Relevant Pressure Tier" shall mean the low, medium and intermediate pressure tiers of the gas distribution network more particularly identified from time to time within the Energy Networks Association published document GDN/PM/GT/1.



## 8 Recommendation

The Panel has recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this self-governance modification.