

UNC Workgroup 0369 Minutes
Re-establishment of Supply Meter Points – measures to address
shipperless sites

Wednesday 08 June 2011

31 Homer Road, Solihull, B91 3LT

Attendees

Bob Fletcher (Chair)	BF	Joint Office
Helen Cuin (Secretary)	HC	Joint Office
Alex Ross	AR	Northern Gas Networks
Alison Jennings	AJ	Xoserve
Andrew Wallace	AW	Ofgem
Anne Jackson	AJa	SSE
Cesar Coelho	CC	Ofgem
Chris Warner	CW	National Grid Distribution
James Chapple	JC	SSE
Joanna Ferguson	JF	Northern Gas Networks
Linda Whitcroft	LW	Xoserve
Mark Woodward	MW	Xoserve
Nadina Johnson	NJ	British Gas
Naomi Anderson	NA	EDF Energy
Sasha Pearce	SP	RWE Npower
Sharon Broadley	SB	ScottishPower
Steve Mulinganie	SG	Gazprom
Sue Cropper	SC	British Gas
Tricia Moody	TM	Xoserve

1. Introduction and Status Review

1.1. Review of Minutes of the previous Meeting

The minutes were approved.

1.2. Review of Actions

0004: Xoserve to provide a breakdown of the current 96 Shipperless sites greater than 73,201kWhs into age of meter and AQ.

Update: AJ provided a breakdown of the current Shipperless sites, which are capable of offtaking gas. These included GSS (Registered User) where the site had been isolated but not withdrawn and GSR (Unregistered) where the site had been isolated and withdrawn. **Complete**

0006: Isolations/withdrawals/removals - Revise the processes to reflect discussions and add clarity, and reissue.

Update: AJ confirmed that the Process Flow Model had been provided and published. **Complete**

0007: Ofgem to clarify positions of responsibility in relation to consumer owned meters.

Update: It was agreed that this was discussed at the previous meeting and could be closed. **Closed**

2. Discussion

CW gave an overview of the updated legal text and confirmed that the modification is to be amended to make it clear that energy as well as commodity is included in the charges. CW clarified that paragraph 3.7.4 refers to isolated only whereas 3.7.5 refers to isolated and withdrawn sites. AW asked the possibility of having some commentary with the text. CW agreed to provide this.

It was recognised that all sites would be treated the same under the modifications whether the meter had not been disconnected or the meter had been disconnected and reconnected. SM was concerned that there was no provision for any mitigation to avoid costs if evidence can be provided that a meter had been removed and re-installed by a party without the knowledge of the Supplier. AJa questioned if evidence could be provided to demonstrate a meter had been removed and re-installed why should the Shipper should pick up the costs from the original isolation date – shouldn't it be from the reinstallation date? Shippers questioned the ability to Stop-the-Clock where evidence is available to prove a site has been reinstated by the customer or where a site should not be reinstated with a deemed supplier for example due to a failed transfer.

TM asked about the time period, which would be allowed from the time of the site visit to the date of the charging. CW confirmed that Shippers would have a month to re-register the site, if not there would be an auto registration by the Transporter.

SM explained that it is not always possible to take consumer owned assets off site to prevent the asset being re-fitted. It was recognised that an offense would be committed for the offtake of gas without consent. SM expressed concern about consumer owned equipment being installed and confirmed that he intended to raise an alternative modification to cover this.

CW explained that a gap is trying to be plugged to reduce the amount of unidentified gas. He explained the identification of a different meter is not included within the scope of this modification but this might be considered desirable by the industry in the future.

AW asked for SM's opinion on who he felt should be responsible for a site where a consumer meter is refitted without consent from the disconnecting Supplier. CW questioned the practise of a customer re-installing a meter and that if the previous supplier is not made responsible then the RbD market would pick up the costs through unallocated gas.

CW despite being notified of an isolation and withdrawal, Transporters are identifying through a GSR visits to remove the service, that the meter is in place and capable of offtaking gas. Xoserve confirmed that a report is produced to highlight these cases but the information does not always result in a re-confirmation therefore the site remains unregistered.

SM questioned if the C&D store should be checked before Transporters visit a site for a service removal as a final audit check and before the pursuance of cost recovery from Shippers.

AW questioned the legal text and whether it ought to reflect that the meter may have not have been disconnected and reconnected.

SB asked about the back-billing of customers under the ERA Billing Code. It was clarified that if the customer is not responsible for an error the Supplier cannot bill back, however the ERA billing code will not apply to instances whereby a deliberate

attempt has been made to offtake gas without a Supplier. It was acknowledged that Suppliers may need to consider how the modification fits with the ERA billing code on back billing, i.e. the limited circumstances whereby the supplier can bill back more than 12 months.

CW confirmed that a Cost Impact Assessment is being worked on and that a ROM will be requested.

The Workgroup considered the Workgroup Report on the acceptance that this would need to be revisited when Gazprom raises the alternate.

BF asked about the possibility of providing the materiality on the benefits to be gained. It was explained cost savings could be made on the avoidance of aborted service disconnect visits, the levying of unregistered gas consumption and the costs current borne by RbD sites.

SP asked how smart meters would impact the regime. The ability to remotely isolate a smart meter was discussed. CW identified that use of the 'slam shut' valve which it is understood is contained within a Smart Meter was not identified as a method of disabling offtake of gas under the current Meter Asset Managers Codes of Practice (MaMCoP). CW noted that if this was thought to be necessary as a pre-requisite for UNC Isolation then the matter would need to be considered by the MaMCoP Scheme Management Board. It was noted that this was chaired by Ofgem. SM questioned whether Transporters would currently accept this method. CW responded that as the technology does not meet the relevant industry criteria Transporters would not presently permit Isolation under the UNC in these circumstances, noting that the UNC does not currently contemplate Smart Metering. CW urged that given the significance of the concern that the issue be discussed under MaMCoP governance. CW further stated that it was not National Grid's intention to seek any delay in progressing the modification pending clarification of Smart Metering issues.

SC asked about the implementation date and how Transporters would treat an instance if a meter were found after this date and how retrospection would be managed. CW confirmed that this would be considered.

SC also asked in terms of the implementation date if time can be allowed for Shippers to consider any change in practise they may need to make for example to instigate site visits to check sites.

AJa asked about found meters without an MPRN. AJ believed that if the meter were simply found not previously registered, these would be excluded. However, if an RGMA flow had occurred for isolation then these would be included.

AJa highlighted that the modification could result in customers being faced with costs of meter removal to enable Shippers to mitigate risk.

New Action 0008: CW to provide a commentary for the legal text.

New Action 0009: AJe to consider if it is possible to identify a cost saving benefit should this modification be implemented.

New Action 0010: AJe to provide process rules for discussion with the process map.

3. Any Other Business

None raised.

4. Diary Planning for Workgroup

The next meeting will take place at:

13:00, 27 July 2011, at 31 Homer Road, Solihull, B91 3LT

ACTION LOG – Workgroup 0369

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0004	06/04/11	2.0	Xoserve to provide a breakdown of the current 96 Shipperless sites greater than 73,201kWh into age of meter and AQ.	Xoserve (AJ)	Complete
0006	13/05/11	2.0	Isolations/withdrawals/removals - Revise the processes to reflect discussions and add clarity, and reissue.	Xoserve (AJ)	Complete
0007	13/05/11	2.0	Clarify positions of responsibility in relation to consumer owned meters.	Ofgem (AW)	Closed
0008	08/06/11	2.0	Provide a commentary for the legal text.	National Grid Distribution (CW)	Pending
0009	08/06/11	2.0	Consider if it is possible to identify a cost saving benefit should this modification be implemented	Xoserve (AJe)	Pending
0010	08/06/11	2.0	Provide process rules for discussion with the process map.	Xoserve (AJe)	Pending