Stage 01: Modification	At what stage is this document in the process?

0526:

Identification of Supply Meter Point pressure tier

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

	The Proposer recommends that this modification should be: • Issued to consultation.
	High Impact: None
	Medium Impact: Transporters
	Low Impact: Shippers, Suppliers and MAMs

Contents

About this document:

This modification was originally presented by the proposer to the panel on 19 February 2015.

The panel considered the proposer's recommendation and agreed this modification should be:

- referred to a workgroup for assessment.

The Proposer recommends the following timetable:

Initial consideration by Workgroup	26 February 2015
Amended Modification considered by Workgroup	28 April 2016
Workgroup Report presented to Panel	19 May 2016
Draft Modification Report issued for consultation	19 May 2016
Consultation Close-out for representations	10 June 2016
Final Modification Report presented to Panel	13 June 2016
UNC Modification Panel decision	16 June 2016

Any questions?

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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that is 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.

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 (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 procedures[1]. 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.

Implementation

The Gas Transporters have determined to make the data available in a readily accessible manner and the Transporters' Agent has agreed to host the information on their website, so the information can be made available relatively easily, and therefore will not need a long lead time for any system development, so implementation is proposed to be as soon as practicable, but not later than 3 months from implementation.

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;

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

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[2], the Supply Meter Point pressure tier will be provided for a MPRN. Shippers, Supplier's 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 & 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 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…

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

[3] www.legislation.gov.uk/uksi/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.

We believe 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 we would envisage that the GT's 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.	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 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.

5 Implementation

Implementation is proposed to be within 3 months of a decision on the modification.

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 GTs 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, we anticipate delivery of this change within 3 months of a decision, well ahead of Project Nexus Implementation Date.

7 Legal Text

Text Commentary

To be provided by Gas Transporters when development of the modification is complete.

Text

To be provided by Gas Transporters when development of the modification is complete.

8 Recommendation

The Proposer invites the Workgroup to:

- Agree this modification should progress to consultation.