UNC Distribution Workstream Primary and Sub-deduct networks

**Arrangements for Isolation.** 

Chris Warner 23<sup>rd</sup> June 2005

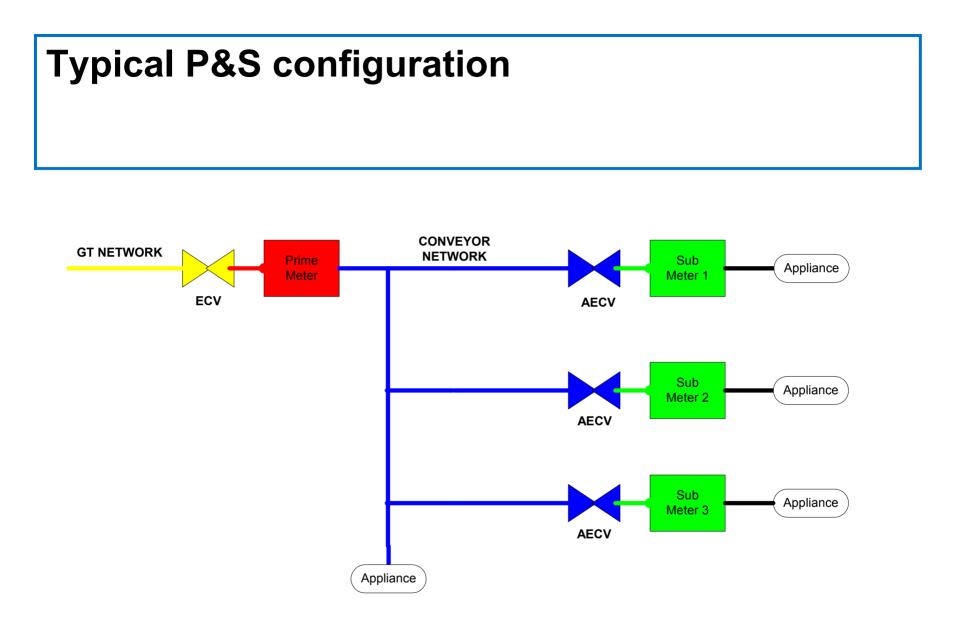
# Primary & Sub-deduct metering Pre-requisites for RGMA

- Meter Asset/Work Unbundling sub-group.
- What is on critical path for July 2005?
- What issues are inherent P&S anomalies needing resolution but not for July 2005?

Critical path:

- Development of 'low tech' flows (MAM-Shipper-Transporter).
- Development of new business rules within Contract Review Group.
- Development of operational guidance notes.
- Indefinite retention of 'unique sites' metering provisions within the UNC.
  Workstream:
- Isolations.

- Nature of issue
  - Shippers wish to Isolate and Withdraw from Supply Points having a Primary Supply Meter Point (SMP) where the Primary SMP has no load other than that of the Sub-deduct meters.
  - Shippers concerned that they are not able to recover costs/maintain meter where no supply contract exists at Primary SMP.
  - UNC Section (G1.8.1(e)(iii)) describes as a 'check meter'. (termed an 'analytical' meter).
  - Supply to sub-deduct meters must be maintained.
  - Previous provisions with Isolation Siteworks Agreement defunct.
  - UNC 'silent' on P&S Isolations.



- Transco asked to provide comments
  - Views on 'legacy' obligations.
  - Views on 'duty to supply'.
  - Views on solution options.
- Transco has issued a statement concerning its position.
  - Legal
  - Commercial

- Legislation
  - P&S constitutes 'installation pipework'.
  - Responsibility for 'downstream' pipework combination of shipper registered at the Primary SMP and landlord/owner of the site.
  - Safe operation of the pipework not determined by GSMR which governs the transporters activities.
  - P&S Network not covered by Pipeline Safety Regulations.
  - Gas Act exemption order for P&S.

- Transporter obligations
  - No legislative obligation to convey gas to Sub-deduct SMP.
  - Gas Act obligation to provide a connection at the Primary ECV.
  - GSMR obligation to maintain safe working at appliance (set and seal regulator at Primary SMP).

- 'Legacy'
  - Sub-deduct arrangements regulated by supply agreements between consumers and British Gas Plc prior to 1<sup>st</sup> March 1996
  - Arrangements deemed to transfer to Centrica or its subsidiaries in accordance with para 19 to the 5<sup>th</sup> schedule of the Gas Act 1995.
  - Contracts for supply established within competitive market.