

- Reasonable endeavours scheme – iGT view / comments

The scheme is generally supported, however there does not seem to be a great deal that the iGT community can do to provide additional support to that which is already being given.

The common thread running through the comments received is that when an illegal activity is discovered the Supplier is invariably advised. The I&C market would seem to offer greater opportunities for identification – maintenance works (for example) mean that unauthorised operation of by-pass facilities are readily identified, while the attendance on site by the DN Emergency Service Personnel mean that they (rather than the iGT operational staff) are more likely to identify theft instances

As a matter of self-interest, the iGT community support the reduction in intentional gas theft and confirm that all information requests submitted as part of this activity shall be handled sympathetically and wherever possible promptly.

Those iGT organisations who also operate as MAMs, have confirmed that, whenever identified, instances of theft are treated as serious breaches of the meter provision contract and treated accordingly. Specifically, where a by-pass has been operated without authorisation, and it is clearly demonstrated that this facility has been used for the purposes of stealing gas, the facility shall be permanently disabled. Provision of the meter installation shall then be undertaken on the proviso that subsequent maintenance activities are carried out in consultation with the end-user at a reflective cost.

- ToG & CO incidents – iGT view / comments

Where attendance onsite by the Emergency Service Provider (ESP) identifies theft of gas the iGT community are able to recover the costs incurred from the end-user. This is, therefore, considered to be a reasonable activity that attendance onsite is undertaken.

The iGT community disputes the assertion that the responsibility for funding this activity lies with the Operator as the source of the CO lies downstream of the limit of their equipment i.e. the iGT responsibility ends at the Emergency Control Valve.

The source of the CO, when identified on site, is found exclusively to be due to the customer's equipment; hence there is a justifiable argument that the costs should be borne by the end user. The argument that this may deter the end user from reporting potentially dangerous situations is conceded.

The current position regarding CO incidents, where the ESP charges the iGT for attending site, is however seen as a significant drain on resources and considered to be an unreasonable cost of business. It is recognised that attendance by the ESP is, on balance, a desirable activity but the recovery of costs (on a cost neutral basis) is seen as its natural counterpart.

It is understood that the DNOs are in discussion with the Regulator to gain agreement that the extension of the use of the emergency service to undertake this activity and it is considered reasonable that the iGT community should be treated in a similar fashion.

Inexus Group currently experience 1 – 3 instances per week of attendance by the ESP in response to CO related reports. Generally these are not directly attributed to incomplete gas combustion; instead they are almost exclusively due to alarm malfunction or more commonly discharged batteries.

On the basis that the current process is continued, with the iGT obliged to fund the ESP attendance, an alternative approach should be investigated and implemented as a matter of urgency.