UNC Workgroup 0763R

Review of Gas Meter By-Pass Arrangements

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- As part of the slide pack presented at the May DWG, the proposer set out a series of questions that the Meter By-Pass Review should seek to answer
- The following slides provide a summary of progress against each of these questions along with a view from both the proposer and where relevant, the CDSP on the potential next steps to be taken



- 1. Is installation of a Meter By-Pass being notified to the CDSP in a timely manner?
 - Investigation by CDSP so far would indicate potentially not
 - The CDSP have undertaken a further piece of analysis of by-passes installed during 2021 and pre 2021 to compare the date the by-pass was installed to the date the update was received by CDSP systems (slide 5)
 - This profiling should help to better answer the question. I.e. is notification typically received within a few days, a week, 2 weeks, longer?
 - While the timing of updates on installation or status changes for by-passes do not appear particularly concerning based on the analysis to date, it should be noted this is only on the by-passes that the CDSP are aware of
 - From the data presented at the June DWG, it is where updates are not being received that would be more of a concern



- 2. Are changes in Meter By-Pass status (i.e. 'open' to 'closed') being notified to the CDSP within 2 Supply Point Systems Business Days as per the UNC requirement?
 - Investigation by the CDSP so far would indicate probably not
 - The CDSP have undertaken a further piece of analysis of by-pass status updates received during 2021 and pre 2021 to compare the date the by-pass status changed to the date the update was received by CDSP systems
 - This profiling would help to better answer the question. I.e. is notification typically received within the 2 business days defined in the UNC
 - As with Question 1, while the timing of updates by-pass status changes do not appear particularly concerning based on the analysis to date, it should be noted this is only on the by-passes that the CDSP is aware of. It is the updates that seemingly aren't being received that are more of a concern



ONJOB / ONUPD ANALYSIS

	ONJOB	ONUPD
Number of Updates	21.00	70.00
Average Update Time (Days)	3.00	34.00
Standard Deviation (Smaller Values mean less variability)	3.84	99.46
Number of Updates (Pre-2021)	17.00	56.00
Average Update Time (Pre-2021)	3.18	7.98
Standard Dev (Pre-2021)	4.11	17.20



- 3. Following notification that a By-Pass has been closed, are subsequent consumption adjustments being notified to the CDSP within 15 Supply Point Systems Business Days as per the UNC requirement?
 - Again, investigation by the CDSP so far would indicate probably not
 - Worrying that based on the figures presented at the June DWG, only 2 out of 43 needed a consumption adjustment and even then this needed chasing by Xoserve as the Shipper had not responded within 15 business days
 - Also worrying that where a Consumption Adjustment was not required, in the majority of cases this was because there wasn't a by-pass physically present on site despite a bypass being present in UK Link (i.e. indication that no update being sent by the Shipper to UK Link to say that the by-Pass had been closed and/or removed)



- 4. Are MAMs seeking the appropriate permissions from the Transporter before a Meter By-Pass is installed?
 - Based on the data from Cadent presented by Andy Clasper at the June DWG, it looks like permissions are being sought by MAM's
 - To help verify whether this is happening in all instances, a further exercise could be undertaken to compare the number of by-passes installed on a given GT's network on UK Link to the number of requests approved by that GT for the same time period
 - This would be a relatively straightforward thing for the CDSP to facilitate by extracting all sites on a given GT's network with a meter by-pass in UK Link
 - The GT could then undertake a check against these sites (or a sample of these sites) to confirm whether a request had been received by a MAM or not



- 5. Are Meter By-Passes being installed as intended; i.e. only in the type of premises detailed in GDN/PM/GT2 and the MAMCoP?
 - Initial indications from analysis would indicate potentially not
 - Some of the definitions for the type of properties a by-pass can be installed at are pretty broad though (multiple occupancy, complex metering, etc)
 - Might need further analysis to flag those sites that do look like the 'right' type vs those with a question mark – then a potential follow up activity for Shippers to investigate whether a by-pass is actually installed and whether it is appropriate? Also potential question for a MAM expert contact?
 - If the CDSP were required to focus on particular sites they would need that instruction/definition from industry parties
 - Would also need to consider how to oblige Shippers to do this?



- 6. How is the existence of a Meter By-Pass notified during a switch / change of Shipper?
 - The existence of a by-pass is notified during change of supplier on a U06 / N90 Record within the MRI. Post CSS implementation it will be notified on a U06 / N90 Record within the on the TMC



- 7. In what circumstances are Meter By-Pass removals processed in industry systems? I.e. is it only upon notification via ONJOB of a physical removal or are there other circumstances in which a by-pass is removed?
 - Either on notification on an ONJOB that a bypass has been removed or when another ONJOB/ONUPD is sent without the By-Pass record present
- 8. What degree of confidence is there that Meter By-Passes that exist in industry systems with a status of 'closed' are correctly sealed to prevent misuse?
 - Removed as question is poorly worded and probably covered by question 11 in any case



- 9. Are the existing UNC governance arrangements for Meter By-Passes clear and fit for purpose?
 - Clear, yes, albeit Shippers may not be particularly aware of their obligations based on CDSP data analysis and lack of industry focus on By-Passes previously
 - Fit for purpose, perhaps not. Potential for a Mod to consider:
 - a) An additional step in the process for Shippers to advise whether a Bypass is still in place if it has already been open for a defined time – indication from a MAM expert has indicated a bypass would unlikely to be open past 2 weeks and usually significantly less
 - b) A new requirement (in addition to sending a consumption adjustment within 15 days where it is required) to also send a notification where a consumption adjustment isn't required. At present, there is nothing to close the loop. I.e. if a consumption adjustment hasn't been sent in 15 days, is this because it genuinely isn't required or is it because a Shipper just hasn't made the assessment or sent the update?



10. Are the wider end to end process for Meter By-Passes clear and fit for purpose?

- Unclear. We likely need more data on whether MAM's are making GT requests and whether premises types look valid in order to answer this properly (referenced in questions 4 and 5)
- Should the length of time a bypass remains open be timebound? MAM expert advice has indicated this would not normally be more than 2 weeks albeit there may be exceptional circumstances where it is longer?



- 11. Is the existing Meter By-Pass data held in industry systems accurate? I.e. what degree of confidence do we have that the status of a Meter By-Pass has remained as declared?
 - Low confidence based on CDSP analysis to date
 - A data cleanse exercise is likely to be required albeit the CDSP would likely need to be instructed by industry via a DSC change proposal.
 - Data cleanse likely to be prioritised based on:

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- Open bypass present where a site is also recording consumption
- Open bypasses that have been open greater than 2 weeks
- Closed bypasses that have been in situ for greater than [1 year?]
- Closed bypasses for sites apparently falling outside of the defined property types
- General cleanse/investigation by Shippers for bypasses recorded on their portfolio in UK Link to determine whether or not a bypass is actually still physically present?

Thank you for listening



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