

<b>Date</b>	27 <sup>th</sup> June 2012
<b>Reference</b>	iGT045
<b>Title</b>	Identification of Meter Point Supply Pressure
<b>Proposer</b>	Colette Baldwin E.ON
<b>iGT UNC / Pipeline Operator</b>	iGT UNC
<b>Modification Proposal Dates</b>	<i>Circulation: 17/02/2012</i> <i>Response: 09/03/2012</i> <i>Circulation of DMR: 30/03/2012</i> <i>Response to DMR: 24/04/2012</i> <i>DFMR published: 16/05/2012</i> <i>DFMR considered at Panel: 20/06/2012</i> <i>FMR sent to authority: 27/06/2012</i> <i>Circulate Authority's determination: dd/mm/yyyy</i> <i>Suggested Implementation date: dd/mm/yyyy</i>

### Background

Independent Gas Transporters have networks with domestic premises that have medium pressure supply points. These installations can require the use of different regulators or meter box houses and currently it cannot be determined from the Supply Point Register which sites are affected.

### The Proposal

The proposal seeks to require the provision of the "Meter Point Supply Pressure" in the Portfolio Extract.

### How will the proposal operate?

Pipeline Operators will be required to include the Meter Point Supply Pressure in the Portfolio Extract. The field will be populated with L = Low Pressure, M = Medium Pressure, I = Intermediate Pressure and H = High Pressure.

For the avoidance of doubt the pressure levels are defined as:

- Low pressure - up to 75mbar
- Medium pressure - 75mbar to 2 bar
- Intermediate pressure - 2 bar to 7 bar
- High pressure - above 7 bar

### Suggested timescale for implementation

The Proposer has indicated six months from authority consent

### Section of the Code Concerned

APPENDIX G-2 PORTFOLIO EXTRACT FILE FORMAT

### Responses to Modification Proposal

4 responses were received to the Modification Proposal, and a further response to the Draft Modification Report consultation. All responses can be viewed [here](#).

Respondee	Response to iGT045 MP	Response to iGT045 DMR
E.ON Energy	Support	-
ESP	Support	-
GTC	Do not support	-
SSE Pipelines	Do not support	-
IPL / QPL	-	Do not support

## Facilitation of the relevant objectives

*How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Standard Condition 9 of the Gas Transporters Licence.*

### Summary of Responses to the Modification Proposal and Draft Modification Report

Relevant Objective	Relevant	Not Relevant
a. the efficient and economic operation of the pipe-line system to which this licence relates		5
b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters	1	4
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence		5
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers		5
e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers		5
f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition	1	4
g. so far as is consistent with sub-paragraphs (a) to (f), the 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		5

\* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

*Any additional comments:*

### **Proposers View:**

The Proposer believes that by implementing this proposal, Pipeline Users arranging for metering work on the iGT networks will have increased confidence about the metering point requirements and will not incur additional costs for abortive works because different requirements are needed for sites with a higher pressure. This will primarily be as a result of the premise information provided before visit being more accurate (ensuring the correct regulator/meter box houses are available). By having greater visibility of the pressure at the premise, the Proposer also suggested it would facilitate the efficient roll out of smart metering by enabling the planning process to take account of the differences in gas pressure.

### **iGT UNC Party Response Summary:**

One Party who voted in favour of the Proposal, noted several concerns with the Proposal despite voting to support it. The concerns included a need for better understanding of the need for the proposal (i.e. isn't the issue more so related to suppliers and their agents not following standard practice), draft legal text (definitions section being used to list obligations) and the potential costs that will be incurred by iGTs. Nevertheless, the Party was will to lend some support for the proposal despite additional cost, given there could be some benefit from making the information more readily available (via a central database to record

increased third party metering activity).

Those Parties not in support of the Proposal believed that there was an existing industry process (GT1/GT2 forms) in place to request technical meter point information, including pressure and hence this proposal was an unnecessary additional overhead. These forms and associated procedures were developed to ensure the requirements of the MAM under the MAMCoP could be undertaken.

For example, any third party wishing to carry out works on an IGT Network are obligated to send a GT1 form to the Network Operator at least 48 hours before work is due to commence. Part of the GT1 requests the pressure of the supply point. Therefore this information is available to the suppliers MAMs and could be passed back to the shippers.

As such, a number of Parties against the proposal identified that the Proposal did not make efficient use of iGT resource and consequently did not promote the efficient and economic operation of the pipe-line system. A Party also noted it did not appear that an equivalent request had been made to GDNs to provide the same information to Pipeline Users.

One Party also suggested a need for this work to be combined within a larger Portfolio Extract review, combining further expected changes into the same system enhancements to reduce costs.

One Party summarised their position noting it recommended that the MAM and Supplier directly identify a method of transferring the required data between themselves rather than placing duplication of effort and additional cost on iGTs. Based on this view, the Party deemed it inappropriate to place an iGT to Shipper obligation under the iGT UNC as the provision of information can be carried out by parties outside of the Code.

### **Modification Panel View**

The Panel was split in their voting (2 For and 2 Against) with one abstention and therefore could not recommend that the Modification be implemented. The Panel agreed that although there were some benefits to implementing the Modification, it could not be seen as an absolute requirement. Panel Members also agreed that there were already mechanisms in place to accomplish what the Modification is seeking to achieve.

Those Panel Members who voted in favour of implementing, considered that the increased availability of information achieved by the Modification could be seen as an efficient improvement to current processes. It was also noted that the Modification could better facilitate code objectives b, e and f, citing the fact that the availability of the correct information would add efficiency and could avoid potential instances where domestic supply isn't restored as a result of incorrect information.

Those Panel Members who voted against implementation, noted that the process seemed to be a duplication of existing processes. It was considered that any such duplication could be seen as adversely impacting code objectives b and f, rather than facilitating them given the costs which would be incurred to implement the significant system developments.

The Panel agreed that if the Authority agreed to implement, the Modification should be implemented in the next release not less than 9 months from the date of Authority Consent. This was primarily due to the complexity of the system developments required by some Pipeline Operators to implement.

**Likely impact on environment?**

None.

**Implementation issues including impact on systems**

Several of the responses indicated the Proposal would involve system changes (both timely and costly). Therefore a minimum of six-nine months implementation lead time should be applied if implementation is directed by the Authority.

Several parties stressed that the proposal seemed to replicate existing obligations with regards to the provision of such data, and that if implemented, the extensive system changes (required by iGTs) would have no form of cost recovery.

Another Party specified the changes would relate to the issue that the pressure details were held in their Network Design system, rather than their SPA system from which the Portfolio is extracted, which would lead to amendments to the both systems and implementation of some form of migration exercise to populate the data in the SPA system.

**Proposed Legal Text** *(Provided by Transporters)*

See also attached appendix showing additional text within Appendix G-2 Portfolio [Extract file format](#). Further text changes are outlined below.

**PART D - SUPPLY METER INSTALLATION**

**1 Introduction**

1.2 For the purposes of the Code, in relation to a Supply Meter Point:

(a) the **"Supply Meter Installation"** is the meter and associated equipment and installations installed or to be installed at a Consumer's premises, including associated pipework, regulator, filters, valves, seals, housings and mountings. A Supply Meter Installation includes any convertor (where installed pursuant to the Gas (Calculation of Thermal Energy) Regulations 1996) and Daily Read Equipment;

(b) the **"Supply Meter"** is the meter comprised in the Supply Meter Installation;

(c) **"Meter Installation Works"** means the installation, testing, maintenance, repair, exchange or replacement of a Supply Meter Installation or any part thereof (but does not include meter reading).

(d) **"Meter Point Supply Pressure"** is the pressure rate at which gas is delivered to the Supply Meter Point before it is regulated and is classified as follows:

- Low pressure -up to 75mbar
- Medium pressure- 75mbar to 2 bar
- Intermediate pressure- 2 bar to 7 bar
- High pressure- above 7 bar

**PART M**

**"Meter Point Supply Pressure"** shall have the meaning in Part D1.2(d);

**Other Information**

None.