

## Stage 04: Final Modification Report

# iGT075:

## Identification of Supply Meter Point pressure tier

*To improve communication of the Supply Meter Point Pressure Tier by the iGT to Shipper/Supplier/MAM.*



Panel determined to implement/not implement the Modification (SG)



High Impact:



Medium Impact:  
Pipeline Operators



Low Impact:  
Pipeline Users, Suppliers, MAMs

At what stage is this document in the process?

01

Modification Proposal

02

Workgroup Report

03

Draft Modification Report

04

Final Modification Report



## Contents

1. Plain English Summary .....	3
2. Rationale for Change? .....	4
3. Solution.....	5
4. Relevant Objectives.....	6
5. Impacts and Costs.....	7
6. Likely Impact on Consumers .....	7
7. Likely Impact on Environment .....	7
8. Implementation .....	7
9. Legal Text.....	8
10. Consultation Responses .....	9
11. Panel Discussions .....	10
12. Recommendation .....	10

## About this document:

This document is a Final Modification Report, presented to the Panel on 19<sup>th</sup> October 2016.



**Any questions?**

Contact:

**Code Administrator**



[igt-unc@gemserv.com](mailto:igt-unc@gemserv.com)



**0207 090 1044**

Proposer:

Colette Baldwin



[Colette.baldwin@eonenergy.com](mailto:Colette.baldwin@eonenergy.com)



**Telephone**

02476 181382

Workgroup Chair:

Code Administrator



[igtunc@gemserv.com](mailto:igtunc@gemserv.com)



0207 090 1044


IGT075

Final Modification Report

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Version 1.0

Page 2 of 10

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## 1. Plain English Summary

### Is this a Self-Governance Modification?

It is proposed that this modification meets the self-governance criteria, as there are no material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

### If so, will this be progressed as a Fast Track Modification?

No.

### Rationale for Change

Shippers/Suppliers/MAMs require 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 Pipeline Operator using the GT1 procedures<sup>1</sup>. The GT1 procedure is manual and time-consuming for both parties.

### Solution

The Pipeline Operator will be required to publish an electronic list of the relevant pressure tier applicable to the MPRNs (including those without a meter attached); where there is a service laid, 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

It is considered that Relevant Objectives a), c), and d) will be better facilitated.

### Implementation

The workgroup recommended that this change should be implemented no sooner than six months following a decision to implement.

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<sup>1</sup> [www.energynetworks.org/gas/regulation/gas-transporter-procedures.html](http://www.energynetworks.org/gas/regulation/gas-transporter-procedures.html)

## 2. Rationale for Change?

The Supply Meter Point Pressure Tier is not currently stored and communicated in industry data flows. On specific request of the Pipeline Operator, using forms defined by GT procedures, the Supply Meter Point pressure tier will be provided for a MPRN. The MAM requires 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 inappropriately qualified meter workers may result in abortive work, frustrated customers and in the worst case inappropriate work.

It is impractical for the MAM to send, or for the Pipeline Operator 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 the submission of a GT1 in advance of all meter work, with the resulting administrative burden on Pipeline Operators and industry parties. 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 which would be unsustainable.

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. These are whole market figures irrespective of network operator, and iGT pipelines will have significantly less, but to understand the impact solely on iGT networks, it may not be directly proportional to the number meter points considered, but rather relative to the likelihood of higher pressure tier networks built. 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 operator 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, customer compensation 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 iGT, Shipper, Supplier, MAM, Customer and members of the public. The HSE have highlighted at MAMCOP situations where inappropriate work has been performed.

The Gas Safety (Management) Regulations 1996, Regulation 6(8) 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...

UNC modification 0526 was raised to introduce the same requirements on GDNs as this modification. However, GDNs chose to implement the solution without the obligation being introduced into the UNC, therefore the UNC Panel determined that the modification was unnecessary. Since the GDNs have agreed to provide the quarterly data and make it available via their Agent’s website, the proposer was happy to accept this approach.

This modification is required to oblige the Pipeline Operators to publish an equivalent set of data of meter point pressure tier at post code level.

There is a perception that all iGTs networks are low pressure networks, however we do not believe this is the case, and we believe there are numerous medium pressure networks built by iGTs over the years, so this modification will give Shippers, Suppliers and MAMs greater transparency and allow appropriate qualified meter workers to attend site.

The Work Group noted that the parallel UNC modification 0526 had been rejected, and no appeal had been lodged. Regardless, the proposer of iGT075 was keen that the iGT UNC change should proceed through the change process.

One Work Group party noted that the data gathered by the AMO (see above) was irrelevant for the change, as it did not distinguish the iGT sector from the large transporter statistics. The Work Group generally considered that it was likely that

aborted calls would be lower for iGTs

### 3. Solution

There is currently no specific data item on the central systems to store the pressure level. The modification proposes that the Pipeline Operator create a centrally accessible register of the mains pressure tier by post code. This mirrored the approach, set out in UNC Mod 0526, which was subsequently rejected and was instead implemented as a solution without the obligation being formally introduced into the UNC. Access to the register will be made available to iGT UNC parties as well as to Suppliers and Meter Asset Managers, by an appropriate mechanism.

The Pipeline Operator will publish the information quarterly using a file extract:

File: Post code data only. The file will contain the following data items:

- Post code – in and out code
- Pipeline Operator
- 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)

It is proposed that, at post code level, the Pressure Tier' will be defined with the following valid set (as extracted from the GT1 form):

- LP
- MP
- MP35
- MP65
- MP105
- MP180
- MP270
- IP
- Mixed
- Unknown

It is acknowledged that some Pipeline Operators 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.

We believe that Pipeline operators 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 Pipeline Operator will replicate the postcode solution implemented by the GTs and the data is to be published in a centrally accessible web based location, for clarity this will see all Pipeline Operators data being on the same web location.

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 Pipeline Operator & meter worker 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 safety practices, procedures and industry safety standards to which the parties subscribe would be unaffected, together with any relevant safety legislation to which the parties are subject.

If a MAM believed that the information provided was incorrect, then they should report this to the Pipeline Operator with any supporting evidence, and the Pipeline Operator should review its records, advise the MAM and update the central records.

As part of any data gathering activity MAMs have indicated that they may be willing to provide their records of pressure tier to the Pipeline Operators to assist them to review

and ensure their records are as complete as possible.

Pipeline Users would be encouraged to refer in the first instance, to the data extract before initiating the GT1 enquiry to reduce the operational burden of the GT1 process on Pipeline Operators.

The Work Group considered several iterations of the solution before agreeing the final Work Group report. The Proposer has amended the solution to include a data item of Medium Pressure (MP) in the valid set, to allow for postcode areas where the medium pressure rate could not be determined. There was some discussion with respect to the inclusion of post code areas with a dummy in-code (for instance on new developments without a confirmed post code). The Work Group agreed that iGTs should include dummy post codes and, in the event of any confusion, Shippers could use the GT1 process to clarify.

The Proposer confirmed the expectation that the information from all iGTs would be hosted in a central location, but did not determine where that location should be.

The Work Group generally agreed that the solution met the requirements for the change.

## 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 satisfied as respects the availability of gas to their domestic customers.	None
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

The Work Group agreed that this Modification would facilitate:

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 Pipeline Operators. Pipeline Operators have an existing duty to respond to all requests from parties, historically these requests have been made only where applicants suspect the site may not be low pressure, based on local knowledge. This should lead to a reduction in overall costs for resourcing the existing process, based on a more economic and efficient service delivery but this will also depend on the costs that the iGTS will incur in providing the requested functionality and the extent to which it actually reduces the numbers of GT1 requests.

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 iGT & Shipper/Supplier/MAM.

Sending a meter operative with the incorrect training and equipment will generally lead to an aborted visit, a frustrated customer, wasted costs, including customer compensation 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 iGT, Shipper, Supplier, MAM, Customer and members of the public.

## 5. Impacts and Costs

The Proposer states the understanding that this change will lead to efficiency savings by the Pipeline Operator in the long term, as a move to a more self-service approach by Users will reduce the administrative burden on Pipeline Operators resourcing this process, and whilst there will be initial costs to build and publish the data that will be incurred by the Pipeline Operators, the anticipated reduction in manual work by Pipeline Operators should result in a net benefit to them.

Additionally, Pipeline Users, Suppliers and Meter Workers will also benefit from a faster turn-around time in getting the information, which will assist them in planning smart rollout activities, dealing with urgent metering issues at site, and ensuring a right first time visit experience for the customer.

One Workgroup attendee noted that there would be costs incurred by iGTs for the gathering, hosting and maintenance of this information.

## 6. Likely Impact on Consumers

The Work Group agreed the change could result in fewer abortive visits, thus reducing costs and frustration for customers with successful visit outcomes first time.

## 7. Likely Impact on Environment

The Work Group agree that there are no likely impacts on the environment.

## 8. Implementation.

The Work Group notes that system changes will be required by iGTs and recommends an implementation in the first release six months following a decision to implement.

## 9. Legal Text

As prepared by the iGTs following the conclusion of the Work Group (note: was presented to the Modification Workstream on 6<sup>th</sup> September 2016 and received no challenge).

### iGT UNC SECTION K – GENERAL

#### Add new Paragraph 45

45.1 The Pipeline Operator shall on a quarterly basis publish, by postcode, details of the Relevant Pressure Tiers, subject to Clause 45.2(b), operating within its gas distribution network together with the name of the Pipeline Operator. All the Pipeline Operators will publish their information in Microsoft Excel spreadsheet format as set out in Appendix K-4 and all the Pipeline Operators will use a common website, access to which will be available to all Pipeline Users, Suppliers and Meter Asset Managers.

45.2 (a) For the purposes of this paragraph “**Relevant Pressure Tier**” shall mean the low, medium and intermediate pressure tiers of the gas distribution network more particularly identified from time to time within the Energy Networks Association published document GDN/PM/GT/1; and

(b) Where the Relevant Pressure Tier cannot be specifically identified as per Clause 45.2(a) for a post code, one of the following designations shall instead be published as the Relevant Pressure Tier for that particular postcode:

- (i) MP (where the pressure tier is known to be medium pressure but cannot be more specifically identified); or
- (ii) GT1 (where within a post code the pressure tiers are mixed or unknown).

Appendix K-4

Field Name	Data Item Definition	Mandatory/ Optional/ Conditional	Domain T = Text, N = Numeric, D = Date	Field Length	Decimal	Comments/Format
Post Outcode	Standard PAF outcode as defined in the PAF digest. Note validation requirements between outcode and incode.	M	T	4	0	
Post Incode	Standard PAF incode as defined in the PAF digest. Note validation requirements between incode and outcode.	M	T	4	0	Where an Incode has not yet been setup e.g. for a new build property then the default value should be ZZZZ
Gas Transporter id	Gas Transporter short code identifying the Gas Transporter, per MDD.	M	T	3	0	

Pressure Tier	The factor which converts the metered volume into units of 100cu ft or cubic meters	M	T	5	0	As per GT1 definitions: e.g. (LP, MP35, MP65, MP105, MP180, MP270,IP) with the following additional conditions (i) Use MP (where the pressure tier is known to be medium pressure but cannot be more specifically identified); or (ii) Use GT1 (where within a post code the pressure tiers are mixed or unknown).
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## 10. Consultation Responses

Representations were received from the following parties:

Company / Organisation Name	Support Implementation or Not?
BU-UK	Not In Support
ESPUG	Not In Support
Indigo Pipelines	Not In Support
Fulcrum	Not In Support
SSE Energy Supply	Supports (Qualified)
npower	Supports
E.ON	Supports

### Summary of Comments

Full responses can be found on the relevant page of the iGT UNC website.

#### Self-Governance Status

All respondents agreed that the Modification met the criteria for self-governance.

#### Support for implementation

No Pipeline Operator respondents supported this Modification as they felt that they could not support the change when the parallel UNC 0526 was not implemented. It was noted that two Pipeline User representatives were in support, with one returning a qualified support.

Two of the Pipeline User respondents fully supported the modification citing they felt it would be an effective way to reduce cost of abortive visits and that it would go some way in improving customer experience, as this negates the need to enquire unnecessarily. The Pipeline User respondents further considered that the change would improve the competitive market, and remove the operational burden of the GT1 process.

SSE Energy Supply returned a qualified support and commented that they could see the rationale for change and did support the modification, but wished to highlight that the equivalent UNC Mod UNC 0526 was previously rejected. They further commented that although they agree with the principle of sharing metering pressure information around the industry, they believe this modification, if implemented, would serve as an interim and manual measure only.

#### Relevant Objectives

All Supporting respondents agreed that iGT075 should better facilitate Relevant Objectives:

- (a) the efficient and economic operation of the pipe-line system to which this licence relates; and
- (c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this license.

iGT075

Final Modification Report

10 October 2016

Version 1.0

Page 9 of 10

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With some citing the following objective:

(d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers

### Impacts and Costs

There was a consensus between Pipeline Operators that there will be a cost to build a central database, which if implemented should be shared between all iGTs and Shippers.

### Legal Text

All respondents agreed that the legal text was fit for purpose.

### Implementation

All supporting respondents gave a 6-9 months' timescale from decision to implementation, with at least 6 months taken to negotiate the contract of the new database. Indigo suggested that this should perhaps wait to be implemented after SSP (Project Nexus).

### Further Comments

There were concerns that using the post code as the main identified of pressure tiers is not an accurate representation of data collected, and identifying these pressures tiers could be problematic, and that in its current proposed form it would not meet the objectives it has set for itself.

**SSE** noted with respect to the 'Pressure Tier' line of Appendix K-4, it may be beneficial to split this section as below, in order to highlight more clearly that use of GT1 is the last resort.

'As per GT1 definitions, e.g. (LP, MP35, MP65, MP105, MP180, MP270, IP) with the following additional conditions:

- Use MP, where the pressure tier is known to be medium pressure but cannot be more specifically identified **AND/ OR**
- Use GT1, where within a postcode the pressure tiers are mixed or unknown.'

All respondents pointed towards the GT1 system which is already in operation. **Brookfield Utilities** said; In many cases the GT1 process will still need to be followed and therefore implementing this modification will not provide a sufficient solution or improve the efficient and economic operation of the pipeline system. We do not feel mandating the iGTs to produce a pressure tier table promotes effective competition between the GDNs and the iGTs.

## 11. Panel Discussions

*This section should contain a summary of the discussions held at the Panel meeting at which the FMR was raised.*

Insert text here.

## 12. Recommendation

Having considered the Modification Report for iGT075, the Panel determines:

- that proposed self-governance Modification iGT0xx be made; or
- that proposed self-governance Modification iGT0xx not be made.