

Stage 01: Modification Proposal

iGT075:

Identification of Supply Meter Point pressure tier

At what stage is this document in the process?



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



The Proposer recommends that this modification should be:

- assessed by a workgroup



High Impact:



Medium Impact:

[Pipeline Operators](#)



Low Impact:

[Shippers Pipeline Users/Suppliers & MAMs](#)

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About this document:

This modification will be presented by the proposer to the panel on 18th February 2015.

The panel will consider the proposer's recommendation, and agree whether this modification should be subject to self-governance; and whether it should be issued for consultation or be referred to a workgroup for assessment.



Any questions?

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1. Plain English Summary

Is this a Self-Governance Modification?

~~The modification is not proposed to be self-governance as it will have impacts on both Gas Transporters and Shippers systems.~~

~~Yes—~~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.

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 ~~iGT~~Pipeline Operator using the GT1 procedures¹. The GT1 procedure is manual and time-consuming for ~~the enquirer and the iGT who has to respond~~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

The existing GT1 procedure is manual, labour intensive and time-consuming for the enquirer and the ~~Pipeline Operator~~iGT. Recording the information centrally so that relevant stakeholders can obtain the data directly will be more efficient; it will reduce the need for ~~iGTs~~Pipeline Operators to resource the ~~is~~manual process, and it will enable Pipeline Users to adopt a more efficient self-service approach. This will become increasingly beneficial over time, as the ramp up in the rollout of smart meters will result in a greater number of enquiries being managed directly by Users and the GT1 process only being used in exceptional circumstances. and enable Users to obtain the information directly. This should result in lower on-going operational costs for ~~Pipeline Operators~~iGTs and will improve the timeliness of access to the data, ~~and ensure~~ing that shippers/suppliers or MAMs ~~can ensure that relevant,~~deploy suitably trained staff (~~with~~with the appropriate equipment) ~~to attend~~site.

Implementation

~~The earliest this can be implemented is 16 months~~days ~~from authority~~following a ~~decision of the iGT~~UNC Panel.

2. Rationale for Change

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¹ www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

The Supply Meter Point Pressure Tier is not currently stored and communicated in industry data flows. On specific request of the [iGT Pipeline Operator](#), using forms defined by GT procedures², 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 ~~the wrong person~~[inappropriately qualified meter workers may results result](#) in abortive work, ~~and a~~[frustrated customers](#) and in the worst case inappropriate work.

It is impractical for the MAM to send, or for the [iGT 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 ~~every MAM submitting~~[the submission of](#) a GT1 in advance of all meter work, with the resulting administrative burden on ~~iGT Pipeline Operators & Supplier/MAM 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 ~~ive~~ 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)³ 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](#)

² www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

³ www.legislation.gov.uk/ukxi/1996/551/regulation/6/made

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 all on low pressure networks, however we do not believe this is not 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.

Subsequent changes to RGMA will need to be considered to enable parties to communicate the data items between iGT/Shipper/Supplier & MAM) utilising industry data flows.

3. Solution

Proposed 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 (mirroring the GTs solution), ~~and that it is hosted on the Large Transporter Agency's website.~~ 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 as at the following valid set ~~as (as extracted from the GT1 form)~~ follows:

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

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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.

~~It is proposed that all new connections should have their pressure level captured and stored within these records, and that the data is updated and refreshed quarterly—at the end of February, May, August and November each year. This will result in the data becoming richer over time.~~

~~All pressure enquiries resulting in the production of a GT1 document should have their pressure updated onto this central record.~~ 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 & ~~m~~MAMeter 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 operational safety activities would remain to minimise the opportunity of error.

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~~the data gathering ~~stage-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.

4. Relevant Objectives

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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

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 Operator](#)iGTs. [iGTs/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.](#)

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.

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~~Implementation costs and timescales will have to be identified when the business rules and system impacts are fully developed and understood.~~

~~We believe that this 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.~~

6. Likely Impact on Consumers

We believe it will result in fewer abortive visits, thus reducing costs and frustration for customers with successful visit outcomes first time.

7. Likely Impact on Environment

We don't foresee an environmental impact.

8. Implementation

~~6 months from authority decision~~ As a self-governance modification, this could be implemented 16 days following a decision of the iGT UNC Panel, however we do anticipate it may take longer to build and publish the data.

9. Legal Text

~~Legal text will be provided by the Gas Transporters when development of the proposal is complete.~~

~~PART D – SUPPLY METER INSTALLATION~~

~~1 Introduction~~

~~1.1 This Part D sets out requirements in respect of the installation of meters and other equipment at Supply Meter Points.~~

~~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;~~

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(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

(e) **"Relevant Pressure Tier"** shall mean the low, medium and intermediate pressure tiers of the Pipeline Operator's network, more particularly identified from time to time within the Energy Networks Association published document GDN/PM/GT/1

The Pipeline Operator will publish, in a centrally accessible location, the Relevant Pressure Tier at postcode level and that it is refreshed on a quarterly basis.

11.10. Recommendation

The Proposer invites the Panel to:

- Determine that this modification should ~~not~~ be subject to self-governance;
- Determine that this modification should progress to Workgroup assessment.