

# **Draft Modification Report**

At what stage is this document in the process?

# IGT128:

# Amendment of definitions in D1.2



Report

## **Purpose of Modification:**

To revise section D1.2 drafting to remove ambiguity for definitions relating to "Supply Meter Installation" and "Meter Installation Works"

This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.



The close-out date for responses is 13<sup>th</sup> August 2019, which should be sent to <a href="mailto:IGTUNC@Gemserv.com">IGTUNC@Gemserv.com</a>. A response template, which you may wish to use, is at the IGT UNC website.

The Panel will consider the responses and agree whether or not this self-governance modification should be made.



High Impact:

None



Medium Impact:

None



Low Impact:

Pipeline Operators, Pipeline Users



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The Proposer recommends the following timetable:				
Initial consideration by Workgroup				
Amended Modification considered by Workgroup				
Workgroup Report presented to Panel				
Draft Modification Report issued for consultation	23 <sup>rd</sup> July 2019			
Consultation Close-out for representations	13 <sup>th</sup> August 2019			
Variation Request presented to Panel				
Final Modification Report available for Panel	15 <sup>th</sup> August 2019			
Modification Panel decision	23 <sup>rd</sup> August 2019			

## **Comments**

The Panel agreed to send this modification straight to consultation as the initial draft modification had been discussed at the July Workgroup under the RG006 work. The proposer amended the modification following that discussion. The Panel did not believe the modification needed further development.



## 1 Summary

#### What

This modification seeks to revise the drafting for "Supply Meter Installation" and "Meter Installation Works" in section D1.2 to remove ambiguity.

## Why

Discussions at RG006 concluded that the wording for "Supply Meter Installation" and "Meter Installation Works" could be improved by removing ambiguity and this modification seeks to ensure clarity by clearly articulating what is included in the scenarios which evoke these code clauses.

### How

By amending the code clauses in line with the recommendations from RG006.

## 2 Governance

#### **Justification for Self-Governance Procedures**

The amendments proposed in D1.2 do not have any direct impact on future or existing gas consumers. They do not have any impacts on competition as it relates to clarity in code drafting. There is no impact to the pipe-line system nor security of supply and do not impact governance procedures and does not discriminate between any classes. This change could be deemed as housekeeping as it is editing definitions and therefore qualifies for being progressed via Self-Governance routes.

### **Requested Next Steps**

This modification should:

- be subject to self-governance
- be assessed by a Workgroup

We recommend that this is reviewed as part of the RG006 discussions before it goes out for consultation.

## 3 Why Change?

Discussions at the RG006 review focussed on text extracts which could be improved. The text was cascaded around Pipeline Operators and Pipeline Users and two questions were asked

- Q1) In the Supply Meter Installation definition, are the 'including' attributes accurate?
- Q2) In the Meter Installation Works wording, are the attributes listed accurate?

## The responses for Q1 – "Supply Meter Installation":

Overall the Pipeline Operators were consistent but a Pipeline Operator and a Pipeline User both responded to query the inclusion of 'housing' in the text. The RG006 group discussed this and agreed that it was not the responsibility of the Pipeline Operator or the Pipeline User and shouldn't be included.



The group also concluded the use of 'including' insinuated that more could be included and could therefore be misinterpreted. As the aim of RG006 is to ensure consistency and transparency the group recommended the removal of 'including'.

The group also discussed 'what is in associated pipework' and again the group agreed clarity would be beneficial to code for existing and new entrants (both Pipeline Operators and Users). Therefore, clarity is required for this attribute in the code to ensure it remains robust.

The responses for Q2 - "Meter Installation Works"

The review group concluded that in the main the listings in the definition were robust, however, there needed to be clear articulation that the definitions "Meter Installation Works" when combined with the definition of "Supply Meter Installation" describes all of the activities needed to install the Supply Meter and connect the gas supply to the Consumers installation so that the Consumer will be 'on supply'. The recommendation was to ensure wording remained robust and clearly articulates the installation requirements.

## 4 Code Specific Matters

#### **Technical Skillsets**

Knowledge of metering would be beneficial but not essential.

#### **Reference Documents**

RG006 - Review of metering arrangements in the IGT UNC

## 5 Solution

The proposed solution to amend D1.2 is:

"Supply Meter Installation"

- 1) Remove the word 'including' as this should be an explicit list
- 2) Remove references to 'housing' as this is not the responsibility of the Pipeline Operator or the Pipeline User
- 3) Ensure clarity on 'associated pipework'
  - a. What is within the Pipeline Operators remit (up to and including the ECV)
  - b. What is within the Pipeline Users remit (between ECV outlet and Meter outlet)

"Supply Installation Works"

- 1) Clarify that the listed 'works' activities may be provided individually or as a combination.
- 2) Clarify that 'works' also includes certain consumable items 'where required' to connect the Supply Meter to the Consumer's gas installation.



# 6 Impacts & Other Considerations

# Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No impacts and therefore not applicable.

## **Consumer Impacts**

No direct impacts anticipated as this modification seeks to bring clarity to code drafting and not changing the principles of any part of code.

## **Environmental Impacts**

None.

# 7 Relevant Objectives

Impact of the modification on the Relevant Objectives:				
Relevant Objective	Identified impact			
(A) Efficient and economic operation of the pipe-line system	None			
(B) Co-ordinated, efficient and economic operation of	None			
(i) the combined pipe-line system; and/or				
(ii) the pipe-line system of one or more other relevant gas transporters				
(C) Efficient discharge of the licensee's obligations	None			
(D) Securing of effective competition:	None			
(i) between relevant shippers;				
(ii) between relevant suppliers; and/or				
(iii) between DN operators (who have entered into transportation				
agreements with other relevant gas transporters) and relevant shippers				
(E) Provision of reasonable economic incentives for relevant suppliers to	None			
secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers				
(F) Promotion of efficiency in the implementation and administration of the Code	Positive			
(G) Compliance with the Regulation and any relevant legally binding	None			
decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators				



This modification would have a positive impact on Objective F as it would ensure clarity and transparency in the IGT UNC drafting which ensures that the code remains robust.

## 8 Implementation

As per Self-Governance procedures with implementation recommended for the next scheduled release following approval (subject to the appeals window closing).

## 9 Legal Text

## **Suggested Text**

Suggested initial legal text for D1.2:

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, which consists of the regulator, filters, valves, seals mountings and associated pipework between the ECV and the Supply Meter. The Supply Meter Installation ends at the outlet port of the Supply Meter. A Supply Meter Installation includes any convertor (where installed pursuant to the Gas (Calculation of Thermal Energy) Regulations 1996) and Transporter Daily Read Equipment;
- (b) the "Supply Meter" is the meter comprised in the Supply Meter Installation;
- (c) "Meter Installation Works" means one or more of either the installation, testing, maintenance, repair, exchange or replacement of a Supply Meter Installation or any part thereof (but does not include meter reading). Where required, for either the first installation or the replacement of a Supply Meter, the Meter Installation Works shall include any pipe fittings and up to 1m of pipework required to connect the outlet of the Supply Meter to the Consumer's installation.
- (d) a "Smart Meter" means:
- (a) an energy meter that can both send and receive information using an external electronic communications network; or
- (b) an energy meter and a device which is associated with or ancillary to that meter and which enables information to be sent to and received by the meter using an external electronic communications network; and the expression "Smart Metering" is to be read accordingly.

## 10 Recommendations

#### Panel's Recommendation to Interested Parties

The Panel have recommended that this modification should proceed to consultation.