





Final Modification Report	At what stage is this document in the process?
<h1>IGT128:</h1> <h2>Amendment of definitions in D1.2</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>To revise section D1.2 drafting to remove ambiguity for definitions relating to “Supply Meter Installation” and “Meter Installation Works”</p>	
	<p>Panel consideration is due on 16th August 2019</p> <p>The Panel recommends implementation of this self-governance modification.</p>
	<p>High Impact:</p> <p>None</p>
	<p>Medium Impact:</p> <p>None</p>
	<p>Low Impact:</p> <p>Pipeline Operators, Pipeline Users</p>

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Timeline

The Proposer recommends the following timetable:

Initial consideration by Workgroup	N/A
Amended Modification considered by Workgroup	N/A
Workgroup Report presented to Panel	N/A
Draft Modification Report issued for consultation	23 rd July 2019
Consultation Close-out for representations	13 th August 2019
Variation Request presented to Panel	
Final Modification Report available for Panel	14 th August 2019
Modification Panel decision	16 th August 2019



Any questions?

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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 (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	None
(D) Securing of effective competition: (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	None
(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	Positive
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

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 Consultation

Panel invited representations from interested parties with the Consultation closing on 13th August 2019. Four representations were received following a full 15-day consultation period.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
BUUK	Support	F - positive	<ul style="list-style-type: none"> We support the implementation of this change proposal because it will provide clarity within the IGT UNC around aspects of metering references. These areas have been considered during RG006 talks and now this modification is delivering on the matters discussed. We support that this modification is suitable for self-governance modification rules. We feel that Relevant Objective F is better achieved by this change as it will improve clarity and transparency of the code. There are no impacts or costs foreseen by this change. We agree that the change can be implemented in the next release of the IGT UNC. We feel that the proposed legal text is sufficient for the purpose of the modification.
ESP	Support	F- Positive	<ul style="list-style-type: none"> We support the implementation of this modification as it seeks to clarify a list of attributes to be more reflective of current industry practices. We are comfortable classifying this modification as self-governance. We welcome the clarification provided by the amended attributes of the terms in questions and believe that implementation of this modification will positively affect the code in terms of Objective F. We will not incur any development or ongoing costs if this modification is implemented. We are satisfied with the legal text.

			<ul style="list-style-type: none"> We are comfortable in seeing this modification be implemented with the next scheduled release of the code (Friday 8th November 2019).
E.ON	Support	F-Positive	<ul style="list-style-type: none"> The proposer supports the amendments proposed in this modification; the changes deliver clear and consistent drafting removing the current ambiguities. The proposer agrees that the changes proposed are self-governance and are not material and therefore do not require Authority decision. The proposer indicates that the modification meets Objective F as it ensures drafting of the Code remains effective and robust. The proposer states that as this modification is mainly wording refinements they do not anticipate any costs associated with this change. The proposer indicates that the implementation of this modification should be in the next code release following self-governance timings.
SSE	Support	F-Positive	<ul style="list-style-type: none"> We agree that this modification will help to remove ambiguity around definitions in D1.2. We agree with the proposed route of self-governance. We agree that this modification positively impacts Objective F. We agree with the proposed implementation at next scheduled release following approval. We agree with the legal text.

In Summary:

- Four responses were received to the consultation for IGT128, incorporating two responses from a Pipeline User and two responses from a Pipeline Operator.
- All respondents offered support for this modification.
- All respondents agreed that this modification better facilitates Relevant Objective F.
- All respondents agreed that this modification meets the criteria for Self-Governance.
- All respondents agreed that this change should implemented in the next release (November 2019).

11 Panel Discussions

Discussion

The Chair indicated that four responses had been received in relation to IGT128 which included two Pipeline Users and two Pipeline Operators. Panel members were informed that all four responses supported this modification.

Consideration of the Relevant Objectives

All Panel members agreed that this Modification meets the criteria set out in Objective F and the published criteria for Self- Governance modifications.

Determinations

All Panel members agreed that this modification should be implemented in the November release. This modification is subject to a 15-day appeal window as per the Self-Governance process.

12 Recommendations

Panel Determination Self-Governance

Members agreed:

- that Modification 128 should be implemented