

UNC Workgroup 0763R Minutes
Review of Gas Meter By-Pass Arrangements
Thursday 27 May 2021
via Microsoft Teams

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Rebecca Hailes	(RH _a)	Joint Office (<i>Observer</i>)
Andy Clasper	(AC)	Cadent
Claire Manning	(CM)	E.ON Energy
Claire Louise Roberts	(CLR)	ScottishPower
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DM _i)	SGN
David Addison	(DA)	Xoserve
David Morley	(DM _o)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Guv Dosanjh	(GD)	Cadent
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica
Rhys Kealley	(RK)	Centrica
Richard Pomroy	(RP)	Wales & West Utilities
Rowan Hazell	(RH _z)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0763/270521>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 October 2021.

1.0 Outline of Request

Dan Simons (DS) and Claire Louise Roberts (CLR) provided the following introduction to Request 0763R and advised that a risk was identified through the management of the Performance Assurance Committee Risk Register in relation to Meter By-Pass valves. The risk was related to Settlement accuracy in the event a by-pass was left in an open position, allowing gas to by-pass the meter.

An initial analysis was performed which highlighted some concerns to the PAC relating to the existing By-Pass arrangements as defined in Uniform Network Code (UNC), which has highlighted the following three areas should be the focus of the Review:

1. Are the existing Meter By-Pass arrangements as defined in the UNC fit for purpose?
2. Are the wider industry Meter By-Pass arrangements clear and fit for purpose?
3. Is the associated Meter By-Pass data recorded in industry systems accurate?

Process Overview

DS proceeded to provide an overview of the current process and the documents that relate to Meter By-Pass:

- A Meter By-Pass is a fitting through which the flow of gas can be diverted so as not to pass through the meter
- Typically, a Meter By-Pass is used to maintain a supply of gas should the meter fail, and/or to allow a meter to be replaced, recalibrated, checked or maintained without interruption to the gas supply
- The circumstances in which a Meter By-Pass would be fitted are limited to specific premises and situations and require the MAM to seek the written approval of both the Gas Supplier and Transporter prior to installation.
- Where a Meter By-Pass is installed, the Shipper is required to update UK Link 'as soon as reasonably practicable' via an ONJOB
- Where a Meter By-Pass is physically Open, the consumption on that site bypasses the meter and there will be no incrementing read
- Once the Meter By-Pass is closed, the MAM should ensure it is 'sealed' to prevent misuse
- The Shipper should then update UK Link within a set period and provide a consumption adjustment.

Industry requirements relating to Meter By-Passes are covered in the following documents:

- Uniform Network Code (UNC) Section M (2.3 and 2.4)
 - M2.3: Interference with meters and meter by-pass utilisation
 - M2.4: Meter By-Pass
- Energy Networks Association (ENA) GDN/PM/GT2
 - A by-pass should only be installed at the following types of premises:
 - Hospitals or hospices
 - Institutionalised accommodation (e.g. homes for the elderly, schools, and prisons)
 - Large or complex plant supporting continuous processes (e.g. agricultural, baking processes)
- Meter Asset Managers Code of Practice (MAMCoP) covers areas such as:
 - Provision of a Meter By-Pass
 - Gas Suppliers Approval
 - Gas Transporters Approval
 - Existent Meter By-Pass and Removal of Meter By-Passes
 - Sealing of By-Pass Valves and Equipment
 - Operation of a By-Pass
 - Actions to be Taken Should the Meter By-Pass Seal be Found Broken
 - Actions to be Taken Should the By-Pass be Found in the Open Position and no Notification has Been Made to the Gas Supplier
- SPAA covers the Retail Gas Metering Arrangements (RGMA)
 - While Meter By-Pass arrangements are not expressly covered under the Supply Point Administration Agreement (SPAA), the file formats (ONJOB / ONUPD) used to exchange data related to a Meter By-Pass installation or status updates are defined as part of the Retail Gas Metering Arrangements (RGMA).

Review Questions

Workgroup considered the following questions that are suggested the Review should seek to answer during the Workgroup meetings going forward:

1. Is installation of a Meter By-Pass being notified to the CDSP in a timely manner?

UNC currently states notification should be as soon as reasonably practicable. It was agreed that Xoserve would take an action to try to report this information:

New Action 0501: Q1 Review Question - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period and how timely were they).

- a. DA clarified that Review of Gas Metering Arrangements (RGMA) reports a meter effective date and receipt date.
2. Are changes in Meter By-Pass status (i.e. 'open' to 'closed') being notified to the CDSP within 2 Supply Point Systems Business Days as per the UNC requirement?
 - a. It was agreed that this is similar to question 1 and will be covered under the resolution of Action 0501.
 3. Following notification that a By-Pass has been closed, are subsequent consumption adjustments being notified to the CDSP within 15 Supply Point Systems Business Days as per the UNC requirement?
 - a. CDSP asked to provide information. CLR asked if the Consumption Adjustment get notified, DA advised there is no obligation to advise CDSP of a Consumption Adjustment.

New Action 0502: Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a consumption adjustment.

4. Are MAMs seeking the appropriate permissions from the Transporter before a Meter By-Pass is installed?

New Action 0503: Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAMs.

5. Are Meter By-Passes being installed as intended; i.e. only in the type of premises detailed in GDN/PM/GT2 and the MAMCoP?
6. How is the existence of a Meter By-Pass notified during a switch / change of Shipper?
7. In what circumstances are Meter By-Pass removals processed in industry systems? I.e. is it only upon notification via ONJOB of a physical removal or are there other circumstances in which a by-pass is removed?
 - a. It was suggested that the actual By-Pass gets removed on meter exchanges but rarely is a removal processed as the sole purpose of the meter works.
8. What degree of confidence is there that Meter By-Passes that exist in industry systems with a status of 'closed' are correctly sealed to prevent misuse?
 - a. It was agreed this question may need to be re-worded.
9. Are the existing UNC governance arrangements for Meter By-Passes clear and fit for purpose?
10. Is the wider end to end process for Meter By-Passes clear and fit for purpose?
11. Is the existing Meter By-Pass data held in industry systems accurate? I.e. what degree of confidence do we have that the status of a Meter By-Pass has remained as declared?

In addition to the above, it was confirmed:

- Meter By-Pass information is reported at PAC every month in terms of how many by-passes are recorded as in an open or closed position.
- An age profile of the by-pass status would be beneficial.

Steve Mulinganie (SM) asked to not confuse twin stream installation with by-pass, also there can be metered by-passes. It was noted that in both cases they are metered and, hence, out of scope.

2.0 Initial Discussion

2.1. Issues and Questions from Panel

None raised.

2.2. Initial Representations

None received.

2.3. Terms of Reference

The standard UNC Request Terms of Reference will apply and is embedded within the Request.

3.0 Next Steps

AR confirmed that discussions at the next Workgroup will be based around the review questions discussed under agenda item 1.0.

4.0 Any Other Business

None.

5.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Venue	Programme
10:00 Thursday 24 June 2021	Microsoft Teams	Standard agenda items
10:00 Thursday 22 July 2021	TBC	Standard agenda items
10:00 Thursday 26 August 2021	TBC	Standard agenda items
10:00 Thursday 23 September 2021	TBC	Standard agenda items

Action Table (as of 27 May 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0501	27/05/21	1.0	Q1 Review Question - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period of time and how timely were they).	June 2021	Xoserve (DA)	Pending
0502	27/05/21	1.0	Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a consumption adjustment.	June 2021	Xoserve (DA)	Pending
0503	27/05/21	1.0	Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAM.	June 2021	Cadent (AC)	Pending