

Consultation Response

iGT075: Identification of Supply Meter Point pressure tier

Responses invited by: 29 Sep 2016

Respondent Details

Name: Trevor Peacock

Organisation: Fulcrum Pipelines Limited

Support Implementation

Qualified Support

Neutral

Do Not Support

Please briefly summarise the key reason(s) for your support / opposition

Fulcrum Pipelines Limited do not support this mod for the following reasons

- There is an existing process in place which allows the Shippers / MAMs to obtain the Pressure Tier details at the ECV.
- The mirroring UNC mod was rejected by the GDNs but informally they agreed to provide the data on a voluntary basis. We feel that the iGTs should not have an obligation placed upon them as they could be left in a difficult position should the GDNs stop providing that data.
- Within the Mod it states the pressure is required at mains level "The modification proposes that the Pipeline Operator create a centrally accessible register of the mains pressure tier by post code". However, in order to send appropriate staff and metering equipment the pressure tier should be identified at ECV level as this is where the works are to be carried out.
- The postcode is not an accurate representation of the data, especially when considering new connections. For new connections, the post code allocated to supply points at the early stage could be
 - Compiled using a dummy incode, i.e. LE1 1ZZ. If a shipper / supplier is enquiring against an official post code LE1 8PQ, they would never find the post code on the register and as such have to submit a GT1.
 - Compiled using the post code of the road where the CSEP connection is made. If a shipper / supplier is enquiring against an official post code LE1 8PQ, they may find the post code on the register of the GDN rather than the iGT as it could relate to existing supplies in this locality and mislead the enquirer. This could then result in the shipper / supplier sending out the meter installer with the wrong information & equipment, causing an abandoned visit and as such they would have to submit a GT1.
- The only accurate way of collating this data is against the MPRN for the supply point and this could be provided via a portfolio extract. This would need either a revised mod or a new mod.
- If the Mod is to proceed then the cost of the "centrally accessible register" and its periodic updates & maintenance should be shared between both the iGT's & the Shippers. The implementation of this mod is requested by the Shippers with the suggestion that it would save both parties time. In the workgroup report, it states that "The existing GT1 procedure is manual, labour intensive and time-consuming for the enquirer and the Pipeline Operator." It also indicates that "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" but makes no real indication of the benefit to the Shippers other than a faster turnaround.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Insert text here

Please state any new or additional issues that you believe should be considered

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Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Fulcrum Pipelines do not believe that the implementation of this mod would meet the relevant objectives specified. From the reasons specified above, we do not believe that this mod would reduce the number of GT1 requests needed in order to find the relevant information. The only real methodology of obtaining the pressure tier data would be to provide it for each MPRN and we feel that the portfolio extract would be the best method for providing this.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

The mod proposes that the data is provided via a centrally accessible database. This would incur initial costs to develop and then ongoing costs to maintain the data updates within the database. If the Mod is to proceed then the cost of the "centrally accessible register" and its periodic updates & maintenance should be shared between both the iGT's & the Shippers.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

Fulcrum Pipelines do not support the implementation of this mod but if this Mod was to proceed then a lead time could not be determined until a centrally accessible database could be agreed and created. Consequently I would suggest a minimum lead time of 6 – 9 months

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Based on the proposes intent for the Mod we believe that the legal text is fit for purpose but we don't support its proposed implementation. See comments above for reasons and possible alter4nate solution.

Further Comments

Is there anything further you wish to be taken into account?

None

Responses should be submitted by email to iGTUNC@gemserv.com