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Wales & West Utilities (WWU) response to Call for Input - Exercising Consumer Choice: A review of the gas disconnections framework

Thank you for the opportunity to respond to this consultation. WWU is a gas transporter and a regional gas distribution network (“**GDN**”), serving 2.6 million supply points in Wales and south-west England. This response is not confidential and may be published by Ofgem.

Introduction

We provide a disconnection service to customers and third parties that is either chargeable to the customers, for example where a property is being demolished; or not chargeable when completed for safety reasons.

We have worked with FEN and the other GDNs to respond to questions 1-6 and refer you to that response for those questions.

Questions

7. Of these potential future frameworks, regimes or mechanisms which is preferable and why?

The Gas Safety (installation and use) regulations (GSIUR) makes clear that the obligation for ‘ensure the disconnection is made’ rests with the Supplier. We provide an extract of the relevant paragraph 16 (3) in the appendix to this letter. We recognise that once the Supplier’s contract with the customer has been terminated then it is less easy for the Supplier or its contractor to gain access to do the work. Nevertheless, the duty remains (with the Supplier) and our view is that as the duty is with the Supplier, then the cost should be borne by the Supplier. The Supplier then has several options for arranging for the work to be done or funding that cost.

It is not appropriate for transporters to pick up the obligation to do the activity and the cost under a general safety obligation when there is a specific duty on the Supplier in the regulations which is not being met. If the view is that the Supplier should not be responsible, the GSIUR needs to be amended.

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8. Are there any impediments inherent in the potential future regulatory frameworks, regimes or mechanisms identified in response to question 6 above that would affect their effective operation, the achievement of net zero and/or the protection of consumers?

There is currently no mechanism in industry arrangements for many of the options outlined in the FEN response to question 6; however, the necessary changes could be put in place to enable them, noting that some of these changes would be easier to deliver than others. We recognise that this is not an easy matter to resolve; however, the key requirement is to disconnect customers safely and to avoid customers who remain on the network paying for the disconnections of those who choose to no longer use natural gas.

9. For the purposes of this Call for Input, we have defined ‘small businesses’ as those with an annual gas consumption of not more than 500,000 kWh. What are the implications, if any, of using this definition?

GSIUR distinguishes between connections with service of under 50mm and connections with a service over 50mm. We think that this distinction should be used for the purposes of this call for evidence rather than one that is consumption related. 500,000kWh a year is not currently used as a demarcation in the gas industry, the nearest being 732,000kWh that is used for charging amongst others.

Although there is a field in industry systems for domestic / non-domestic, this is not a mandatory data item and is not routinely updated by Shippers so using it to distinguish between domestic and non-domestic premises is not reliable. Annual consumption changes over time and consumption may fall in the period before a meter is removed, this will be reflected in meter reads assuming that these are obtained by the Supplier and submitted by the Shipper. Once a meter has been removed then consumption will be zero so at the time of disconnection the annual consumption will be zero. The rolling annual consumption is updated each month if a meter read is submitted and we do not believe that past values are available, this means that using the annual consumption in the period before a meter is removed for definitional purposes is problematic.

If we have both a technical and consumption boundary, we will have categories of

- domestic and non-domestic under 50mm service
- Non-domestic small business (less than 500,000kWh a year) under 50mm service but less than 500,00kWh a year
- Non-domestic small business (less than 500,000kWh a year) over 50mm service Non domestic over 50mm service

It is not clear that adding in a definition of small business adds anything to this call for evidence.

10. Is there anything else we ought to consider that has not been covered in your responses to questions 1-9?

We realise that customers are unlikely to welcome charges for ceasing to have a gas connection; however, the cost of disconnection must be met in a way that does not place an unfair burden on one group of customers.

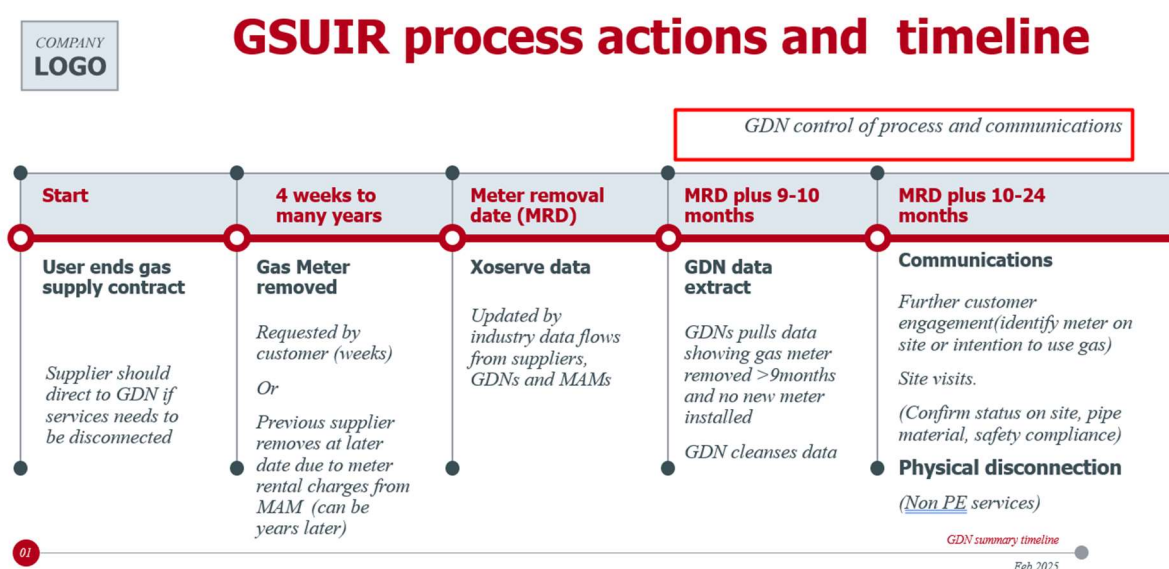
11. What is the step-by-step process for carrying out a gas disconnection and the role(s) of each party involved in the process? As part of your response, please describe the internal, administrative process as well as the practical procedures carried out on-site. Please also confirm at what stage in the process costs are recovered.

Safety disconnections

We undertake this activity where the Supplier fails to act in accordance with its duties under GSIUR. The reason that we do this is because we have an obligation under Regulation 14 of the Pipelines Safety Regulations 1996 (PSR) to ensure that pipelines which are no longer in use must be left in a safe condition, we provide an extract of PSR paragraph 14 in the appendix to this letter.

Since separation of the Gas Industry, the GDNs undertake the service checks and isolations on behalf of the suppliers. As can be seen from the legislation, the obligations under the Regs are, in the first instance, with the gas supplier.

A high-level process including an indicative timeline is shown below. Note the GDN is reacting to a gas meter that has been removed at least 9 months previously, and the customer may have ended their gas supply contract years before that.



Our detailed process is documented in T/PM/SER/3 Management Procedure for Monitoring and Disconnection of Gas Services following Primary Gas Meter Removal as required under the Gas Safety (Installation & Use) Regulations.

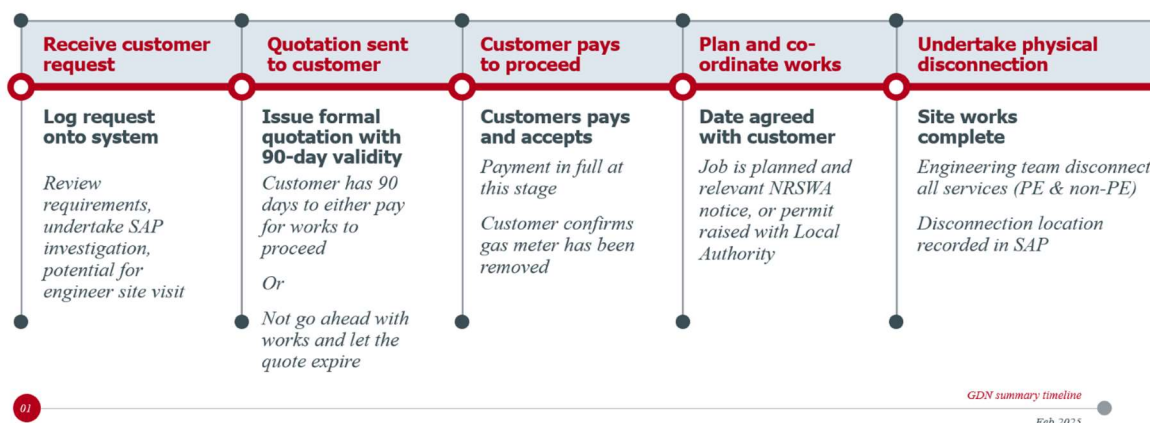
In the case of disconnections under the GSIUR, the costs form part of our Opex cost of maintaining the network and are recovered from all customers through transportation charges as part of the gas bill.

Voluntary disconnections (customer paid for disconnections)

In the case of a demolition or redevelopment, the gas supply must be disconnected before that work can be undertaken – the same would apply for electricity supplies. In these cases, we charge the customer (end user, demolition company, developer, landlord etc) for the disconnection. We would also charge if the customer required the gas supply to be removed to facilitate an alternative heating system.

See voluntary (paid for) disconnection process below:

Voluntary disconnection process



In this case, the customer will make a payment to us when they accept their quotation.

12. What, if any, ancillary services are impacted by the disconnection process (e.g. renovators, appliance technicians etc)? What/who are they, and what impact could any change to the disconnection framework have on them?

We see that gas suppliers will be affected by any changes to the disconnection framework. They will need to provide clear direction to customers on the process and timeline for the gas pipe to be disconnected.

Any changes to the charging arrangements will impact affected parties.

13. How many domestic health and safety disconnections for households and small businesses have been carried out over GD2 to date? What is the anticipated number to be carried out in 2025 - 2026 and over GD3 and up until 2035? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each Local Distribution Zone (LDZ) (or LDZ equivalent for UIPs). If

possible, please also provide a breakdown showing the figure for each type of health and safety connection. If possible, please provide a breakdown showing the figure for households and the figure for small businesses. If you are able to provide data prior to the start of GD2, please do so. In your response, please also explain your methodology for calculating the projected figures, including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

We have submitted our forecast workload in our business plan submission in table 8.10. See table below with health and safety disconnection volumes from 2022 up to 2035.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Overall	387	320	633	800	850	2101	2211	2324	2440	2560	2688	2823	2964	3112
LDZ3 North Wales	31	26	51	64	68	168	177	186	195	205	215	226	237	249
LDZ4 South Wales	151	125	247	312	332	819	862	906	952	998	1048	1101	1156	1214
LDZ8 Central	120	99	196	248	264	651	685	720	756	794	833	875	919	965
LDZ9 South West	85	70	139	176	187	462	486	511	537	563	591	621	652	685

The volumes are based on disconnecting metallic pipes only. The Health and Safety Executive (HSE) are reviewing the requirement to cut off plastic (PE) service pipes. Pending their decision, if there is a requirement to cut off PE services there could be up to an additional 1,000 cut offs per year above the volumes in the table, increasing proportionally each year. Xoserve have identified 14,000 services that may require disconnecting from historical data from 2011.

In 2024/5 we received over 5,000 records from Xoserve which require data cleansing and investigations completed by our administrative support team. These led to just 800 service disconnections. The main factors why we only disconnect approximately 15% of properties for we receive records are;

- Service is plastic (PE) and compliant to remain in situ
- Customer has subsequently had a new meter installed and is using gas
- Customer is planning to have a new meter installed (we track and monitor)

14. What factors, if any, could impact the anticipated number of health and safety disconnections for households and small businesses to be carried out over GD3 and up until 2035?

The main factors we see that will impact the anticipated numbers are:

- Customers deciding that they no longer want to pay the price for using gas / standing charges or they do not have the ability to pay for using gas to heat their homes or small businesses. Customer requests gas meter is removed.
- Supplier – decides they will not fund the standing charge / meter rental costs from the MAM and make the decision to remove the gas meter.
- Change of heating system - customers moving off gas and transitioning to low carbon heating systems such as an air source heat pump (ASHP). Meter removed and then processed as per GSUIR process.

15. How many voluntary disconnections for households and small businesses have been carried out over GD2 to date? What is the anticipated number to be carried out in 2025 – 2026 and over GD3 and up until 2035? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If you are able to provide data prior to the start of GD2, please do so. If possible, please provide a breakdown showing the figure for households and the figure for small businesses. In your response, please also explain your methodology for calculating the projected figures including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

We have submitted our forecast workload in our business plan submission in table 8.10. See table below with voluntary disconnection volumes from 2022 up to 2035.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Overall	764	882	827	831	831	944	951	958	965	973	981	989	996	1003
LDZ3 North Wales	61	71	66	66	66	76	76	77	77	78	78	79	80	80
LDZ4 South Wales	298	344	323	324	324	368	371	374	376	379	383	386	388	391
LDZ8 Central	237	273	256	258	258	293	295	297	299	302	304	307	309	311
LDZ9 South West	168	194	182	183	183	208	209	211	212	214	216	218	219	221

We have approximately a 50% acceptance rate with customers proceeding to pay and have the works completed. There are customers that request a quotation which we process and issue a quotation but do not proceed with the works.

16. What factors, if any, could impact the anticipated number of voluntary disconnections for households and small businesses to be carried out over GD3 and up until 2035?

The main factors we see that will impact the anticipated numbers are:

- Housebuilding rates / redevelopment – brownfield sites may require the demolition of existing buildings before new homes and businesses are built. UK needs to build 300,000 homes a year compared to 150,000 today.
- Change of heat source - customers moving off gas and transitioning to low carbon heating systems such as an air source heat pump (ASHP). Customer needs the service pipe removed to enable the works or wants the gas pipe removed by choice.
- Housing stock upgrades – demolition or re-development of housing stock from Local Authorities or Housing Associations. Example – a housing association in Plymouth demolished 250 homes over several phases and build new energy efficiency homes but with new gas mains and services installed.
- Business operations – business changing how they operate and removal of gas from their process for example. TATA steelworks in Port Talbot, South Wales moving from gas fired blast furnace to electric arc furnace.

17. How many of the voluntary disconnections for households and small businesses carried out over GD2 were deemed to be non-standard (e.g. ‘Sufficiently Complex’) works, by which we mean those works defined as such in your Connection Charging Methodology? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If possible, please provide a breakdown showing the figure for households and the figure for small businesses.

We have submitted our forecast workload in our business plan submission in table 8.10. Our classification of non-standard work includes cutting off large diameter pipes (above 180mm) or operating above 2 bar pressure tiers. Also pipes that form part of a Multi Occupancy Building.

In addition, pipes with a significant engineering difficulty, such as proximity to railways, water courses, archaeological sites and Sites of Special Scientific Interest (SSSI).

See table below with voluntary disconnection volumes deemed as non-standard from 2022 up to 2035.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Overall	15	4	20	20	20	20	20	20	20	20	20	20	20	20
LDZ3														
North Wales	1	1	2	2	2	2	2	2	2	2	2	2	2	2

LDZ4 South Wales	6	1	8	8	8	8	8	8	8	8	8	8	8	8
LDZ8 Central	5	1	6	6	6	6	6	6	6	6	6	6	6	6
LDZ9 South West	3	1	4	4	4	4	4	4	4	4	4	4	4	4

18. How many gas connections for households and small businesses have been carried out over GD2 to date? What is the anticipated volume to be carried out in 2025-2026 and over GD3 and up until 2035? As part of your response, please provide a breakdown showing the figure for each regulatory year and for each LDZ (or LDZ equivalent for UIPs). If you are able to provide data prior to the start of GD2, please do so. If possible, please provide a breakdown showing the figure for households and the figure for small businesses. In your response, please also explain your methodology for calculating the projected figures including the Future Energy Pathway (also known as the Future Energy Scenario) used and any assumptions that have been made to arrive at the projected figures.

We have submitted our forecast workload in our business plan submission in table 5.05. Our assumptions are documented in the BPDT commentary. There has been a downward trend in customers connecting new and existing properties to the gas network in RIIO-GD2, and the forecast is for a continued decrease in customer requests during RIIO-GD3 and beyond this. New and amended legislation is expected from the start of RIIO-GD3 that will significantly impact customer choice.

See table below with new connection volumes from 2022 up to 2035.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Overall	8232	5623	4273	3635	3089	2297	1648	1248	985	798	647	525	426	346
LDZ3 North Wales	659	450	342	291	247	184	132	100	79	64	52	42	34	28
LDZ4 South Wales	3210	2193	1666	1418	1205	896	643	487	384	311	252	205	166	135
LDZ8 Central	2552	1743	1325	1127	958	712	511	387	305	247	201	163	132	107
LDZ9 South West	1811	1237	940	800	680	505	363	275	217	176	142	116	94	76

See table below with a breakdown between new connection type from 2022 up to 2035.

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Overall	8232	5623	4273	3635	3089	2297	1648	1248	985	798	647	525	426	346
New Housing	3008	2466	1608	1367	1162	871	436	218	109	54	0	0	0	0
Existing Housing	3628	2579	2376	2020	1717	1287	1094	930	791	672	587	475	386	316
Fuel Poor	1177	245	63	56	47	0	0	0	0	0	0	0	0	0
Non Domestic	419	333	226	192	163	139	118	100	85	72	60	50	40	30

Costs

19. What costs are incurred in carrying out a health and safety disconnection or voluntary disconnection for households and small businesses, including: (i) the cost and availability of labour (including salaries and wages); (ii) the use of land and related costs (including rent); (iii) finance and administration costs; (iv) regulatory and policy compliance costs; (v) the cost of consumables and other business outputs; (vi) the cost of repairs, upkeep and maintenance; and (vii) any other costs (whether controllable or uncontrollable) incurred that do not fall under (i)-(vi)? As part of your response please provide the current average cost for each and the expected cost for each over the course of GD3. Please provide the figures for both health and safety disconnections and voluntary disconnections if the costs differ for each. If possible, please provide a breakdown showing the figure for households and the figure for small businesses if these differ.

Breakdown shown below of costs in 2023/24 prices as per Business Plan BPDT submission:

Redacted

The costs above are for households and businesses as we do not differentiate between the property type.

The approach in the call for input of taking the mean across all types of standard disconnection charges as detailed by the Gas Distribution Network companies in their Connection Charges Statements" significantly overstated the actual cost of disconnections because the vast majority of disconnections are in the lowest cost category as shown by the figures in the response to question 20 below.

20. What is the average cost of a health and safety disconnection for households and small businesses, including: (i) the average cost for each year of GD2 to date, any changes in average cost over the course of GD2 and the reason(s) for these changes; (ii) the estimated average cost in 2025-2026, during GD3 and up until 2035 and the reason(s) for any changes. In your response, please provide a breakdown showing the figure for each regulatory year if appropriate; and (iii) the number carried out over GD2 to date incurring costs that exceeded the figure provided in answer to question 20(i) above? If possible, please provide a breakdown showing the figure for households and the figure for small businesses if these differ.

The costs are relatively consistent each year with the average cost seen in GD2 and forecast cost in GD3 shown in question 19.

The table below shows the split of disconnections by pipe diameter in GD2 (where this data was available):

Pipe Diameter	Disconnections Volumes	Percentage Breakdown
63mm	1650	95.7%
90mm	52	3.0%
125mm	12	0.7%
180mm	10	0.6%
Total	1724	

96% of all disconnections are for service pipes with a diameter of 63mm or less, with the remaining 4% being 90mm or larger services to non-domestic properties. The average cost of a domestic or small business disconnecting will therefore be slightly less than shown in question 19.

21. In what circumstances has the cost exceeded the figure provided in answer to question 20(i) and are there any other circumstances where the cost would exceed the figure provided in question 20(i)-(ii)?

The cost of an individual disconnection will vary depending on a number of factors including;

- pipe material, diameter and operating pressure
- availability of service isolation valve
- ground type
- pipe depth
- traffic management (road closure, traffic lights, permit costs)
- works required outside of core hours
- protected sites
- engineering difficulties (railways, water courses, MOBs)

We have seen cases of disconnections of high-pressure service pipes costing in the region of £75,000 due to a combination of factors as above.

22. How and when are the costs of a health and safety disconnection for households and small businesses recovered?

These costs form part of our Operational costs for maintaining the network and are therefore recovered from all customers through transportation charges.

23. Is there a cap on the maximum total cost to be incurred in carrying out a health and safety disconnection for households and small businesses and if so, what is the cap?

There is no cap. We will always look to meet our obligations under the regulations for the lowest cost.

24. What is the average cost charged for a voluntary disconnection for households and small businesses, including: (i) the average cost for each year of GD2 to date, any changes in average cost over the course of GD2 and the reason(s) for these changes; (ii) the estimated average cost in 2025-2026, during GD3 and up until 2035 and the reason(s) for any changes. In your response, please provide a breakdown showing the figure for each regulatory year if appropriate; (iii) the average cost of a voluntary disconnection deemed to be non-standard (e.g. Sufficiently Complex) works; and (iv) the number carried out over GD2 incurring costs that exceeded the figure provided in answer to question 24(i) above? If possible, please provide a breakdown showing the figure for households and the figure for small businesses.

Our customer charges can be found in our Connections and other distribution charges document that is published on our website [[Company Reports & Publications | Wales & West Utilities](#)]. Our costs are passed through to customers, we do not apply any profit margins.

The table below provides our costs outlined in our charging document applicable to pipes operating at low pressure or medium pressure:

Service Diameter	Public Land including verges, footpath & roads	Excavation and Reinstatement by Customer on Private Land
<=63mm PE or 2" Metallic	£977	£510

Service Diameter	Unmade & Cultivated land	All Footpath & Road Types	Excavation and Reinstatement by Customer on Private Land
90mm & 125mm PE or 3" / 4" Metallic	£2,360	£2,623	£1,177
180mm PE or 6" Metallic	£2,992	£3,492	£1,329

The vast majority of customer charges (>96%) are <=63mm PE or 2" Metallic. We do not differentiate between domestic and businesses for costs, our costs are determined by pipe diameter and ground type.

25. In what circumstances would the cost exceed the figure provided in answer to question 24(i) above and are there any other circumstances where the cost would exceed the figure provided in question 24(i)-(ii)?

If the disconnection does not meet the criteria for a standard charge as shown in Q24, we will provide a bespoke cost in accordance with our SSC4B Costing Methodology [[Company Reports & Publications | Wales & West Utilities](#)].

These costs would cover labour, materials, reinstatement and traffic management plus any specialist contractors, materials/fittings.

Business Overheads are then applied to these direct costs.

26. How and when are the costs of a voluntary disconnection for households and small businesses recovered?

We provide a quotation to the customer with a 90-day validity period. We require full payment from the customer along with acceptance of the terms and conditions of the works before we plan and complete the disconnection.

27. Is there a cap on the maximum total cost to be incurred in carrying out a voluntary disconnection for households and small businesses and if so, what is the cap?

There is no cap. We will always look at the most cost-effective way of disconnecting the gas supply. There is little variance in domestic services, but non-domestic service disconnections could cost £10,000s if pipe diameter is greater than 180mm or operating pressures above 2 bar.

28. How are the costs incurred for work designed to enhance your system and which are additional to those required to fulfil the requirements of a voluntary disconnection request separated out from the costs incurred in fulfilling the request?

The disconnection work is usually not associated with any other work on our network. However, there are cases where a disconnection may form part of a connections project (disconnect a non-domestic service and lay several new services as part of a development) or as part of our mains replacement programme where we are able to abandon the gas main. In all cases the customer would only pay for the actual costs of the disconnection with WWU funding any enhancement to its system through other Capex and Repex allowances.

29. How (if at all) do costs of gas disconnection for households and small businesses differ depending on: (i) connection type; (ii) consumer type (i.e. household or small business); (iii) complexity of the works (i.e. standard / non-standard works); (iv) time taken to complete the works; (v) headcount; (vi) provider type and size (i.e. the provider of the gas disconnection works, for example, a UIP, GDN or IGT); (vii) geographical location (for example, urban, regional, and remote); (viii) level of competition present in the market for the supply of gas disconnection services; and (ix) any other factors that do not fall under (i)-(vii)?

See question 24 for a breakdown of our charges and question 21 for the other factors that influence costs. Our standards charges are set on a network wide basis rather than regional. We do not disconnect services belonging to IGTs.

30. Can you estimate what proportion of your network is made up of pipes with the following diameters: ≤63mm PE13 / 2" met; 90mm PE / 3" met; 125mm PE / 4" met; 180mm / 6" met; >180mm PE or >6" met? As part of your response, please provide a breakdown showing the figure for each Local Distribution Zone (LDZ) if possible.

Row Labels	≤63mm PE / 2" met	90mm PE / 3" met	125mm PE / 4" met	180mm PE / 6" met	>180mm PE or >6" met	Grand Total
Grand Total (kMs)	9571	7398	5925	4589	5462	32946

Factors affecting the gas disconnections framework

31. What factors affect demand, supply and competition in gas disconnections, including the extent and existence of practices and strategies in response to the existing disconnections regulatory and policy framework?

The GDN is reactive to customer driven work and the volume of GSUIR records from Xoserve. the factors driving this workload are outlined in questions 14 and 16.

Approved UIPs can disconnect pipes subject to our approval. They send in an enquiry with the property details they plan to disconnect which we log on to our customer records system and the UIP will issue a completion form once the properties have been disconnected from our network. This is usually done as part of a contract to redevelop a site (for example cut off a service to a large house and install mains and services for 4 new flats within that building). We completed 807 voluntary (customer paid) disconnections in 2024 and the UIPs completed 19 disconnections.

32. What impact do the above factors have on viability, quality and profits of gas disconnection services?

As the owner of the gas distribution network, we undertake disconnection as 'Gas Act 10 (3)' - requires us to maintain a connection until it is not required. Whether they are paid for or safety driven, we complete the work at our lowest most efficient cost. In the case of voluntary (paid for) disconnection, we only pass on costs incurred by us to the customer.

With the current disconnections workloads being relatively low, this work is undertaken by the same resources who also undertake connections work, emergency and repex work.

If we were to see large increases in disconnections and ultimately a programme to abandon part of the gas network, we would need to employ additional resources to deliver this workload.

The consumer journey

33. What guidance have you made available to consumers on the gas disconnection process and the differences between a voluntary and health and safety disconnection?

In our quotation documents we issue to customers with our quotation price, we include narrative referencing the GSIUR process.

In addition to informing customers in our quotation document we have published the below on our website [\[Disconnect\]](#):

'Disconnecting from the gas network

If you would like to disconnect from the gas network, you should contact your energy supplier. Your energy supplier will arrange for your gas meter to be removed. If you also

need the gas pipe leading to your property removed, you should contact your gas distribution network operator but there may be a charge.

You will typically deal with two companies.

- *Your **energy supplier**, which is the company that bills you for the energy you use.*
- *Wales & West Utilities is the company that maintains the gas pipes in your area. This company is different and separate to your energy supplier.*

Removing your gas meter

- *You will no longer pay standing charges*
- *You will no longer pay for gas usage*
- *Your gas meter will be removed*
- *The pipe carrying gas to your property might remain*

*You can contact your **energy supplier** (the company which bills you for your gas) to end your gas supply contract and request removal of your gas meter. Some energy suppliers may charge for this service, but many offer the service free of charge.*

*Your **energy supplier** will arrange for the gas pipe to be sealed (known as 'capped') at the emergency control valve. The emergency control valve is normally found inside a meter box or inside your home. The capped gas pipe will still be live, but you will no longer pay standing charges or for gas usage.*

If a new gas meter is not fitted within 12 months, Wales & West Utilities will contact the property owner. If the pipe is no longer needed, the gas distribution network operator might carry out additional work to determine if the pipe needs to be removed too.

*Pipes made of metal will usually be disconnected unless they supply gas to your neighbours. We may leave plastic pipes in place and live if there is no risk of corrosion, and they may be required in the future. If the pipe is disconnected, it will be disconnected as close to the gas main as possible and more than 12 months after the meter is removed by your **energy supplier**.*

*Wales & West Utilities will not charge for this type of disconnection. However, you will need to check if your **energy supplier** will charge you to remove the gas meter. You can find their contact details on your energy bill.*

Removing the gas pipe

You might need this service if you are carrying out building work or substantial renovation / demolition work.

*The pipe carrying gas to your property will be removed and this work will be chargeable. If there is a gas meter at the property, you must first contact your **energy supplier** to end the gas supply contract and arrange for the gas meter to be removed.*

*Wales & West Utilities will not disconnect pipes and equipment until the gas meter has been safely removed by your **energy supplier***

- 34. Has any consumer research and/or testing been carried out to establish or improve the service and information you provide to consumers wishing to disconnect from the network? If yes, please provide information on the outcome of that work and any relevant documents and/or data.**

Disconnection (voluntary and health & safety) activities are not included within the RIIO-GD2 Customer Satisfaction ODI-F license obligation. Ofgem are proposing to introduce a customer satisfaction survey from 2025/26

We receive very few customer complaints regarding our disconnection process or charges, only 14 customer complaints were received in 2024. However, when we do receive a customer complaint it is regarding disconnection policy or regulation rather than our service or price.

- 35. What are the barriers or impediments, if any, to consumers understanding the disconnection process and/or framework that are outside your control?**

The health and safety disconnection process can be complex for customers and GDNs. There is a 12-month delay when the meter removal record is sent through. We have no visibility or context what the driver behind the meter was to be removed from the property, whether it was customer or supplier driven. There are no customer details with the records which presents a challenge when we engage with the property owner/landlord/tenant to co-ordinate any engineer visits or physical disconnection date.

Yours sincerely,



Richard Pomroy
Regulation Manager
Wales & West Utilities

Appendix

GS(I&U)R Regulations 1998.

It is a requirement of regulation 16(3) of the Gas Safety (Installation & Use) Regulations 1998 GS(I&U)R],

that where a primary meter is removed the

person who last supplied gas through the meter before removal shall:

a) where the meter is not forthwith re-installed or replaced by another meter -

(i) close any service valve which controlled the gas supply to that meter and did not control the supply of gas to any other primary meter; and

(ii) seal the outlet of the emergency control with an appropriate fitting; and

(iii) clearly mark any live gas pipe in the premises in which the meter was installed to the effect that the pipe contains gas; and

b) where the meter has not been re-installed or replaced by another meter before the expiry of a period of 12 months beginning with the date of removal of the meter and there is no such service valve as mentioned in sub-paragraph (a)(i) above, ensure that the service pipe or service pipework for those premises is disconnected as near as is reasonably practicable to the main or storage vessel and that any part of the pipe or pipework which is not removed is sealed at both ends with the appropriate fitting.

Pipelines Safety Regulations 1996 (PSR)

Regulation 14, states 'the operator shall ensure that a pipeline which has ceased to be used for the conveyance of any fluid is left in a safe condition'. In relation to decommissioning, HSE Pipeline Safety Regulations (PSR) guidance document L82 states that 'Pipelines should be decommissioned in a manner so as not to become a source of danger. Once a pipeline has come to the end of its useful life, it should be either dismantled and removed or left in a safe condition.' This is not always practicable and reference to guidance in HSE Code of Practice L56 - Safety in the Installation and Use of Gas Systems and Appliances: Gas Safety (Installation and Use) Regulations 1998 Approved Code of Practice and Guidance 5th edition' should be followed.