# INSTITUTION OF GAS ENGINEERS AND MANAGERS (IGEM) RISK ASSESSMENT – RECOMMENDATIONS AND OFGEM RESPONSE

## 1 THE PRESSURE REGULATOR

**IGEM recommendation**

*The regulator should be retained as part of the meter installation*

**Ofgem response**

***Note.***

*Ofgem note IGEM's observation that the pressure regulator should be retained as part of the gas meter installation and that effective control could be exercised by gas transporters (GTs) implementing appropriate authorisation schemes.*

*Ofgem note that the RGMA Baseline, which was implemented in July 2004, has been designed on the basis that the meter installation comprises the meter, pressure regulator and associated safety devices.*

*Ofgem also note IGEM's observation that the gas standards making organisations have embarked on a comprehensive programme of creating new and revised standards and procedures which will be more robust than those that existed before the implementation of the RGMA Baseline. In this respect, IGEM expect that a relative decrease in risk would occur as a result of the implementation of the RGMA Baseline.*

## 2 THE GAS METER ASSET MANAGERS' CODE OF PRACTICE (MAMCoP)

**IGEM recommendations**

*(i) The MAMCoP should be made mandatory in law.*

*(ii) An organisation should be appointed to manage and to maintain the MAMCoP. Constant communication should be maintained with CORGI and standards-making organisations.*

*(iii) There should be a MAM registration scheme with auditing of MAM's activities including training and site works.*

**Ofgem response**

*(i)* ***Accept.*** *Ofgem has made MAMCoP mandatory, except where this would clearly be superfluous regulation. Standard Licence Condition 8 of the gas transporter's licence has been amended to oblige a gas transporter, to provide and install a meter at a domestic premises at the request of a gas supplier by using an approved MAM (i.e. a MAM who has been approved by Ofgem as able to adhere to the requirements of the MAMCoP). Standard Licence Condition 34 of the gas supplier's licence has also been amended to require a gas supplier to arrange for the provision of a meter at a domestic premises by using an approved MAM. Non-domestic suppliers on Transco's transportation network are not covered by either Standard Condition 34 or Standard Condition 8, but amendments to the Transco Network Code which were implemented on 24 August 2004 ensures that this work is also carried out by an approved MAM.*

(ii) ***Accept.*** *Ofgem are establishing, an industry-wide MAMCoP Scheme Management Board with responsibility for maintaining and updating the MAMCoP following the implementation of the RGMA project;*

(iii) ***Accept****. Ofgem has established transitional MAM approval procedures and a formal MAM registration scheme will be implemented when a Registration Agent has been appointed. Following this appointment, all MAMs that apply, or have applied, to Ofgem for MAM approval, will be assessed, audited and registered by a competent and independent group contracted by Ofgem. Due to tight timescales procurement rules have not allowed the appointment of a contractor before RGMA go-live and therefore MAM's have been initially approved on the basis of self-certification against the requirements of the MAMCoP. MAM's will however be subsequently audited by the contractor. Additionally, suppliers and GT's need to ensure that their own contractual and statutory responsibilities, covering technical and safety aspects, are appropriately monitored. A list of approved MAMs has been published on the Ofgem web* http://www.ofgem.gov.uk/ofgem/work/index.jsp?section=/areasofwork/meteringrgma

## 3 PROVISION OF INFORMATION

**IGEM recommendations**

*(i) All GTs should put processes in place to provide pressure information to MAMs and OAMIs (in accordance with current Regulations).*

*(ii) Services should be labeled with pressure information, including GT delivery pressure, and capacity, to an approved industry labeling standard.*

**Ofgem response**

*(i)* ***Note.***

*It is noted that The Gas Safety (Management) Regulations1996 provide that the gas transporter must ensure that it delivers gas at a pressure suitable for the safe operation of appliances, and that information about the operating pressures of the gas at the outlet of a service pipe must be provided by them on request by persons proposing to carry out work in relation to gas fittings, but are otherwise unspecific.*

*To comply with these obligations Transco, in its role as a gas transporter, has established arrangements with meter installers that allow a flow of information to facilitate the safe design, installation and maintenance of meter installations. Transco has also put in place a meter appraisal scheme to ensure that it can meet its own obligations in relation to the flow of gas.*

*It is noted that the Gas Safety (Installation and Use) Regulations 1998 require that the service pipe pressure must be known by the meter installer when commissioning a meter although it does not specify how such information is obtained and verified. Regulation 5(1) (Materials and workmanship) provides that: "No person shall install a gas fitting unless every part of it is of good construction and sound material, of adequate strength and size to secure safety and of a type appropriate for the gas with which it is to be used." In order to meet this obligation the pressure the fitting is to withstand in operation must be known.*

*In this context, gas transporters have a requirement, on request, to provide information on service pipe pressure to allow the meter installer to make arrangements to install the meter. In these circumstances a competent meter installer is required to consider the information provided by*

*the Gas Transporter and, in the light of this, determine what, if any, additional data (from alternative sources) is necessary to verify the information provided pertaining to the anticipated conditions at the outlet of the Emergency Control Valve (ECV).*

*Transco has a meter appraisal scheme which outlines their procedures for the appraisal of meter installations including the provision of information on service pipe operating pressures. The scheme outlines the information required from meter installers and information that will be provided by Transco.*

*The scheme does not preclude the meter installer verifying the relevant information pertaining to the anticipated conditions at the outlet of the ECV from alternative sources such as by contacting the gas supplier, undertaking a site visit, contacting the gas supplier and/or the Utility Infrastructure Provider.*

*Transco recently undertook a review of the meter appraisal scheme. The revised scheme introduced in February 2004 included the introduction of a generic appraisal scheme for medium pressure meters, eliminating the need for a site specific appraisal for each installation (as well as making more explicit the circumstances in which metering information, including service pipe information requests, can be verified by the third party themselves through alternative sources).*

*The same obligations covering the provision of pressure information apply to independent gas transporters. HSE has written to all gas transporters to confirm that procedures exist to ensure this statutory obligation can be appropriately satisfied.*

*(ii)* ***Note.***

*The Pipeline Safety Regulations 1996 do not require the labelling of service pipes so as to provide information on service pipe pressure.*

*However:-*

- *IGEM are revising IGEM's standards IGE/G/2 and IGE/TD/4 to also cover the provision of service pipe labeling. IGE/G/2 with a target date of November 2004 with IGE/TD/4 (ed 4) should be available in October 2004. (Further details are given below in Section 4).*

- *Transco's revised meter appraisal scheme introduced in February 2004 provides for the labeling of all new service pipes installed by Transco, in its role as a gas transporter. Such labeling includes information on design pressure, service pipe energy value as well as maximum flow rate.*

## 4 STANDARDS

**IGEM recommendations**

*There should be new and revised industry standards to cover design, installation, inspection and maintenance, for example on "medium pressure."*

**Ofgem response**

***Accept***.

*It is noted that both BSI and IGEM are in the process of reviewing and updating the following standards to recognise the change to a competitive gas metering services market:-*

- *BS 6400 part 1* — *domestic installations with flow rates up to 6 cubic metres/hour up to 75m.bar*
- *BS 6400 part 2* — *domestic installations with flow rates up to 6 cubic metres/hour from 75m.bar to 2 bar*
- *IGE/G/1* — *Definitions*
- *IGE/G/2* — *Labelling of gas components.*
- *IGE/G/3* — *DSEAR Risk Assessments*
- *IGE/GM/7* — *Electrical connections and hazardous area classification*
- *IGE/GM/8 (parts 1 to 4)* — *Non-domestic meter installations. Flow rate exceeding 6 cubic metres/hour and inlet pressure not exceeding 38 bar*
- *IGE/GM/6* — *Specification for low pressure diaphragm and rotary displacement meter installations with badged meter capacities exceeding 6 cubic metres/hour but not exceeding 1076 cubic metres/hour*
- *IGE/UP1/b* — *Tightness testing and purging of domestic sized Natural Gas installations*
- *IGE/UP1/c* — *Strength testing, tightness testing and purging (2003) (meters)*
- *IGE/TD/4(ed 4)* — *Gas services*

*A number have recently been published (IGE/G/1 and IGE/GM/7) and others [BSI 6400 Part 1(amendment 1), IGE/GM/8 parts 1, 2 &4, IGE/G/2, IGE/TD/4, IGE/UP1/b] are due to completed before the end of the year.*

## 5 TRAINING AND COMPETENCY

**IGEM recommendation**

*CORGI ACS training and competency should be reviewed and enhanced.*

**Ofgem**

***Accept***.

*CORGI ACS training and competency has been reviewed and new modules are being produced for activity areas such as medium pressure work which were not previously covered. These new modules will be implemented once the new BSI 6400 part (ii) standard is complete.*

*The Ofgem facilitated Technical Issues sub-group (TISG) established a working group to review ACS training. The working group took forward a supporting work plan which was agreed for implementation at the final TISG meeting on 31 August 2004. Monitoring of progress in this area will be an aspect considered by the MAMCoP Scheme Management Board. CORGI, BSI and IGEM will have a 'Reporting Observer' role.*

## 6 GAS TRANSPORTER AUTHORISATION

**IGEM recommendation**

*All GTs should have authorisation schemes for MAMs.*

**Ofgem**

**Note**.

Under *The Gas Safety (Installation and Use) Regulations1998 there is an obligation that only a gas transporter or a person authorised to act on his behalf can seal pressure regulators connected to primary gas meters. Transco has a formal authorisation scheme in place to appropriately fulfill this obligation. Other gas transporters should confirm to HSE that similar arrangements are in place Additionally, IGEM recommended that the approach covering authorisations for multi – occupancy dwellings should be considered further. Individual authorisations, rather than generic authorizations, may be more appropriate in such circumstances. This aspect of the recommendation will be referred to the Association of Independent Gas Transporters (AIGT) and the Gas Transporters Safety Forum for action.*

## 7 REVIEW OF LEGISLATION

**IGEM recommendations**

*(i)* *The Gas Meters (Information on Connections and Disconnections) Regulations 1996 should be reviewed.*

*(ii)* *The GT responsibility for pressure management should be clarified in legislation.*

*(iii)* *The legal framework should be clarified to recognise the existence and duties of MAMs and Meter Operators (MOs).*

**Ofgem**

*(i)* ***Note**. The RGMA Baseline which helps support a competitive gas metering services market has been designed with regard to the existing provisions of the Gas Meters (Information on Connections and Disconnections) Regulations 1996. IGEM has been asked to provide further information or proposals for improvements*

*(ii)* ***Accept**. The HSE have indicated that they will consider clarifying the GT's responsibility for pressure management as part of its current review of the Gas Safety (Management) Regulations 1996.*

*(iii)* ***Accept.** Ofgem has made MAMCoP mandatory, except where this would clearly be superfluous regulation. Standard Licence Condition 8 of the gas transporter's licence has been amended to oblige a gas transporter to provide and install a meter at a domestic premises at the request of a gas supplier by using an approved MAM (i.e. a MAM who has been approved by Ofgem as able to adhere to the requirements of the MAMCoP). Standard Licence Condition 34 of the gas supplier's licence has also been amended to require a gas supplier to arrange for the provision of a meter at a domestic premise by using an approved MAM. Non-domestic suppliers on Transco's network are not covered by either Standard Condition 34 or Standard Condition 8, but amendments to the Transco Network Code which were implemented on 24 August 2004 ensure that this work is also carried out by an approved MAM.*

*HSE have indicated that they will also consider this issue in its current review of Gas Safety (Installation and Use) Regulations 1996.*

## 8 DIY

**IGEM recommendation**

*DIY installation should be discouraged by effective communication of legal obligations. Consideration should be given to banning DIY meter installation work.*

**Ofgem**

***Note**. The HSE have indicated that they will consider the possibility of banning DIY meter installation work in its current review of Gas Safety (Installation and Use) Regulations 1996. Discussion with DTI covering this point and IGEM's suggestions regarding information at the point of sale will move forward.*