

## Response to Consultation on relaxing the accuracy requirements of Calorific Value Determining Devices

Received by Email

Dear Steve,

As an independent guy with 41 years in the Gas industry, some of which was as metering manager for Transco I have a view regarding the changes being consulted upon.

I have read the papers and in principle I have no worries over the relaxing of the standard but there are issues that will arise.

The maintenance and testing should be rigorous and providing the maintenance is regulated any drift will be minimised and should prevent significant re calculation issues.

A further point is that unless the whole country goes over to the more relaxed tolerance there will be an inevitable consequence on the levels of unaccounted for gas.

This would be caused by the more accurate equipment probably at the beach or LNG send out locations on the Transmission system vs the more relaxed levels in the Distribution Networks.

While the motor to reduce cost is a good thing, every action has a reaction and I suspect we might all be a little worse off and the system of ensuring the customer is kept defended from such consequential issues breaks down.

I would propose a significant time of test and dual operation to verify the robustness and accuracy of this equipment.

Regards

Peter Thompson