Question: For UNC MOD425 and MOD455 could there be a loophole from which meter tampering could go undetected, with rouge meters getting back into the network?

MOD425 "Re-Establishment Of Supply Meter Points – Shipperless Sites" Explanation:

This process seeks to address a subset of Shipperless sites, where the Transporter (or another party) during, for example, a gas safety visit identifies, that following an Isolation or Isolation and Withdrawal, a different Supply Meter (to the previously connected Supply Meter) is installed at the premises and is capable of flowing gas.

In the absence of any knowledge of who installed the different Supply Meter asset or when the meter was installed, it is evident that these meter points could remain Shipperless indefinitely.

If appropriate action is not taken to address the situation, there is a clear risk that the costs of any gas consumed at Shipperless sites will continue to be inappropriately targeted and will alternatively be smeared to the remainder of the industry.

The obligation is placed on the last registered Shipper to take responsibility for resolving the issue by undertaking investigations as appropriate and by ensuring that actions are undertaken that will satisfactorily resolve the issue within three months from the date of notification.

Successful outcomes of a Shipper's investigation could include: the re-registration of the site by the investigating Shipper or registration of the site by another Shipper. The re-registration of a site may be the result of Shipper action or force confirmation/force attachment from Xoserve.

UNC MOD455 "Updating of Meter Information by the Transporter" Explanation:

Under GS(I&U)R (Gas Safety (Installation and use) Regulations), if a meter is removed from site, an engineer is sent to confirm the removal has been left in a safe state. If the engineer finds a meter on site, capable of flowing gas (if it is not capable of flowing gas, it is a safe), the MPRN will be sent to the MOD 425/455 process. The last stage of MOD 455 is to attach a meter to the site.

After a contact has been through the MOD 425 process and has reached 40 business days old in the MOD 455 process, the final step is to attach a meter to the MPRN. When a meter is attached, the record has successfully completed its cycle through the MOD 455 process.

The MOD 455 RCRE Report is created to identify all newly created records within the MOD 455 database. When a new record is created in the MOD 455 database, the responsible Shipper should be notified as soon as possible so they can take action to attach the meter or raise a dispute.

When a contact reaches 40 business days old, a Shipper should have already confirmed the site. From the details provided on the GSR visit located on CMS, a meter should be identified and will then be attached to the MPRN in question. At this time, the responsible Shipper will have had sufficient time to raise any query they have with the MPRN and will be expecting a meter to be attached under the terms of the MOD.

The purpose of forcing a meter to be attached is to push the Shipper into dealing with the site. When a MPRN is confirmed with a meter attached, the responsible Shipper can then remove the meter, withdraw from UK Link and withdraw from site. This will then raise another GSR visit to ensure the meter was removed safely.

Successful outcomes of a Shipper's investigation could include: the re-registration of the site by the investigating Shipper or registration of the site by another Shipper. The re-registration of a site may be the result of Shipper action or force confirmation/force attachment from Xoserve.