

Name of Document For Consultation: Proposed Gas (Supply) Regulations

Company Name: City Gas Pte Ltd

Date of Submission: 4 June 2007

Summary of Comments and Changes

No.	Regulations No.	Comments	Suggested Amendments
1.	3(4)(a)	<p>We need clarification on the need for obtaining consent from the owner to use the gas installation for the supply of gas.</p> <p>It is difficult for the gas retailer to ascertain if the applicant is or is not the owner of the gas installation through which gas is to be supplied. It may be more practical for the consent of the Responsible Person to be sought instead.</p>	<p>We suggest that this requirement should not be applicable to domestic customers e.g. gas customers staying in HDB flats, private condominiums, or houses etc. Currently, a person who opens an account with SP Services will be allowed to turn-on gas supply to the premises.</p> <p>City Gas proposes that the Regulation be amended to allow for permission to be sought from either the owner of the gas installation or the Responsible Person.</p>
2.	3(4)(b)	<p>The party to conduct the tests is not clearly spelt out.</p> <p>The most appropriate party to conduct the tests would be the Designated Representative. Flowing from this, the Designated Representative should provide a certificate to the retailer stating that the appropriate tests have been conducted and complied with. On the basis of the certificate issued by the Designated Representative, the gas retailer should then be entitled to turn on the gas supply.</p>	<p>City Gas proposes to insert, immediately after the word “conducted” in Regulation 3(4)(b), the words “by the Designated Representative” .</p> <p>The Regulation should be amended such that the gas retailer shall not turn on the gas supply until a certificate stating that the appropriate tests have been carried out and complied with has been issued by the Designated Representative.</p>
3.	3(4)(c)	<p>It is not appropriate to place on the gas retailer the obligation to ascertain whether or not the meter installation is left unattended. A more appropriate party to do so would be the Designated Representative.</p> <p>The party to conduct the “appropriate tests” is not clearly spelt out.</p>	<p>City Gas proposes that the Regulation should be amended such that the Designated Representative should be obliged to monitor the situation and inform the gas retailer if the consumer’s internal pipe including the meter installation is left unattended. In the absence of such notification by the Designated Representative, the gas retailer should be entitled to turn on the gas supply.</p> <p>City Gas proposes to insert, immediately after the word “conducted” in Regulation 3(4)(c), the words “by the designated representative”.</p>
4.	3(6)(a)	<p>Instead of the owner of the gas installation, the consent of the Responsible Person should be sought instead.</p>	<p>City Gas proposes that the consent of the Responsible Person be sought in place of the owner of the gas installation.</p>

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5.	4(1)	Consistent with the obligation under Regulation 4(2), the gas retailer's obligation to refuse to supply gas should be made subject to the extent that the gas retailer has knowledge of the fact that the gas installation is unsafe or does not comply with the Regulations.	City Gas proposes that the Regulation be amended as stated below. <i>"To the extent that the relevant gas retailer is aware that the gas installation or gas appliance to which such supply is made is unsafe for use or does not comply with these Regulations, the relevant gas retailer shall refuse to supply gas to such premises."</i>
6.	5(1)	It is not clear who is the proper party to make the application for connection of the gas installation for the supply of gas.	City Gas proposes that the EMA clarify this ambiguity.
7.	10	The heading for Regulation 10 is misleading. There should not be a reference to the inspection of gas service pipes as this is the responsibility of a gas transporter.	City Gas proposes to amend the heading to: <i>Responsibilities of responsible persons to inspect, etc., gas installations</i>
8.	11	Except for consumers in residential premises, non-domestic consumers are responsible for the inspection of gas installation from the meter to the gas appliances. This is not clearly stated in Regulation 11	City Gas proposes to insert, immediately after the words "be responsible for the" in Regulation 11, the word "inspection"
9.	12	The responsibility for inspection is not clearly stated in Clause 12.	City Gas proposes to insert, immediately after the words "be responsible for the" in Regulation 12, the word "inspection,"
10.	17(1)	This Regulation gives the impression that so long as a person has taken all reasonable steps to ensure that the work will not cause danger to any person or property, the person can carry out any work on any pipe that contains gas.	City Gas proposes Regulation 17(1) be amended as stated below: <i>No person shall carry out any work on any pipe that is used or intended to be used as part of a gas installation or gas fitting unless he has applied and obtained prior approval from the relevant gas transporter/retailer and taken all reasonable steps to ensure that the work will not cause danger to any person or property.</i>
11.	17, 18, 19 and 20	None of the work set out in these Regulations should be undertaken by any person unless he is a Professional Engineer or a Licensed Gas Service Worker.	In addition to the requirements already set out in each of these Regulations, there should be an additional requirement that such person is either a Professional Engineer or a Licensed Gas Service Worker.
12.	41	It should be made an offence for any person who is not a Professional Engineer or a licensed gas service worker (or in cases where a Professional Engineer is expressly required, a Professional Engineer) to engage in any gas service work.	EMA to review and comment if it is necessary to make it an offence.