

PUBLIC FEEDBACK ON THE PROPOSED GAS (METERING) REGULATIONS

1. A public feedback exercise on the proposed Gas (Metering) Regulations was held from 18 Apr 2008 to 8 May 2008.
2. Feedback was received from 4 respondents, viz. City Gas Pte Ltd, ExxonMobil Asia Pacific Pte Ltd, Gas Supply Pte Ltd and Keppel Gas Pte Ltd.
3. EMA's assessment on the feedback is tabulated in the attached.
4. EMA thanks all the respondents for their feedback.

EMA'S ASSESSMENT TO COMMENTS ON THE PROPOSED GAS (METERING) REGULATIONS

S/No	Company	Specific Regulation(s) of Proposed Amendments	Revised Amendments	Detailed Reasons for Revised Amendments	EMA's Assessment
1	City Gas Pte Ltd	General	We propose that the Gas (Metering) Regulations be made applicable to meter installation of town gas retail customers.	More than 95% of PowerGas' gas meters are used by town gas customers, the vast majority of which are residential consumers. The interests of town gas consumers should be covered by the proposed Gas (Metering) Regulations.	PowerGas owns these town gas meter installations. PowerGas has to ensure that these meter installations comply with the Gas Metering Code.
2	Gas Supply Pte Ltd	General	<p>There is a repeat of SCHEDULE 1 & 2 in Gas (Metering) Regulations and Gas Metering code.</p> <p>Suggestion: Consolidate such requirements in the Gas Metering Code instead of under "Regulations" and do not replicate them to avoid confusion.</p>		<p>There is no duplication.</p> <p>The Gas (Metering) Regulations cover operational requirements (such as accuracy limits and calibration frequencies) for meter installations connected to the transmission network while the Gas Metering Code covers operational requirements for meter installations of retail customers as well as technical requirements for all meter installations.</p>

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3	City Gas Pte Ltd	First Schedule (Accuracy Limits for Meters) and Second Schedule (Periodic Testing and Calibration of Meter Installations)	As the proposed Gas (Metering) Regulations cover the meter installation of retail customers (as in Regulation 4), we propose to include Category 5 meters in the First Schedule and Second Schedule.	<p>Regulation 2(2) of the proposed Gas (Metering) Regulations states that 'Except as otherwise expressly provided, any reference in these Regulations to a meter installation shall not include a reference to a meter installation located at the premises of a retail customer'.</p> <p>Regulation 4 on 'Tampering with meter installations, etc' specifically makes reference to the gas meters of retail customers; and Regulation 16(2) states the fines and imprisonment for an offence under Regulation 4(1) which includes tampering with meter installations of retail customers.</p>	<p>The Gas (Metering) Regulations cover operational requirements for meter installations connected to the transmission network. Hence Reg 2 explicitly states that unless otherwise stated, any reference to a meter installation would not include meter installation of retail customers.</p> <p>All meter installations, including meter installation of retail customers are explicitly covered in Reg 4 so as to make tampering with any meter installation an offence.</p>
4	Gas Supply Pte Ltd	First Schedule	There are only 4 categories of meter shown in the Gas (Metering) Regulations.		The Gas (Metering) Regulations cover operational requirements for meter installations connected to the

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			But there are 5 categories in the Gas Metering Code; Is there a missing accuracy limits in terms of volume and time for the last category 5 MRM?		transmission network. Hence Category 5 meter installations are not within the scope of the Regulations. Category 5 meter installations are covered in the Gas Metering Code.
5	Gas Supply Pte Ltd	Second Schedule	There are only 4 categories of meter shown in the Gas (Metering) Regulations. But there are 5 categories in the Gas Metering Code. Where is the following requirements for category 5 meters: 1) Peak Flow rate of connection point 2) Pressure and temperature calibration frequency 3) Meter Test frequency		Please see Item 4 above.
6	ExxonMobil Asia Pacific Pte Ltd	Right of access to meter data 15. Every meter owner shall give the following persons	Include Managed Capacity Customers (MCC) in the list persons allowed access to meter data.	Data should be made available to MCCs, if requested, to enable MCCs flexibility in administering its contractual arrangements	Under this Regulation, the relevant direct access customer will be allowed access to the meter data. A direct access customer as

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		<p>access to the meter data held in his meter installation which is in operation and use to measure the volume or energy of natural gas withdrawn from a gas transmission pipeline owned by, or under the management or control of, the designated gas transporter:</p> <p>(a) the designated gas transporter (where he is not the meter owner);</p> <p>(b) the relevant direct access customer or gas shipper who takes gas out from, or ships gas to, the point in the gas transmission pipeline.</p>		<p>with its Shipper. This will enable MCCs to understand the Gas Network Code exposures, e.g. commodity variance, caused by its offtake.</p>	<p>defined in the Gas Act includes a MCC.</p>
7	Keppel Gas Pte Ltd	Reg 9(1) (a) and (b)	Reg 9(1)(a) The meter owner should arrange for the meter to be tested only upon the request of participants		Accepted. Reg 9(1)(a) has been amended such that the meter owner is obliged to arrange to test the meter for accuracy at the request of any

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			<p>who may reasonably be affected by the accuracy of the meter and not upon the request of "any party".</p> <p>Reg 9(1)(b) In addition, the result of the test should be available to the designated gas transporter for verification, rather than to the party requesting the test.</p>		<p>affected party.</p> <p>Not accepted. The result of the test carried out under Reg 9(1)(a) should be made known to the affected parties.</p>