

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

**Company Name: SembCorp Gas Pte Ltd**

**Date of Submission: 30 May 2007**

**Summary of Comments and Changes**

No.	Regulations No.	Comments	Suggested Amendments
1	2	<p>There should be consistency in the definition of "meter installation" as provided under the Regulations, Gas Network Code and the Gas Metering Code. In the Regulations, "meter installation" means "a system that includes a meter and any associated pipes, fittings, components, equipment or instruments". In the Gas Network Code, this term means "a meter and associated equipment including associated pipework, filters, valves, seals, regulators, housings, mountings and telemetry equipment". According to the Gas Metering Code, "meter installation" means "a Meter and associated equipment and installations including associated pipework, filters, valves, pressure regulating equipment, seals, housings, mountings and/or telemetry equipment and may also include Gas Chromatograph (GC)".</p> <p>We would be grateful for the Authority's confirmation on which definition should be the definitive one, which should then be applied across the Regulations, Gas Network Code and the Gas Metering Code.</p>	<p>To amend the following definitions for clarification purposes:</p> <p>""gas metering code" means the <u>gas metering</u> code of practice approved by the Authority, as may be supplemented, varied, modified or replaced from time to time <u>under section 62 of the Act that sets out the obligations of meter owners, gas shippers and gas licensees with regards to meter installations and metering data;</u>"</p> <p>""gas supply code" means the <u>gas supply</u> code of practice approved by the Authority, as may be supplemented, varied, modified or replaced from time to time <u>under section 62 of the Act that sets out the obligation of gas licensees to comply with the standards and procedures for the safe operation of the gas supply system;</u>"</p> <p>""leak free" means there is no gas leak at any part of a gas installation <del>and this is to be</del> <u>as</u> verified with appropriate testing as specified in Singapore Standard CP 51;"</p>
2	3(5)	<p>We wish to highlight the following provisions with regard to turning on and discontinuance of gas supply:</p> <p>i. Section 2.1.1 of the Gas Metering Code provides that the Gas Transporter shall own Meter Installations at any Transmission Network Injection Point, Transmission/Distribution Point, System Critical Point, Distribution Network Injection Point and Retail Customers' Premises.</p> <p>ii. Section 3.1.1 of the Gas Supply Code provides that "an application to disconnect a gas installation or gas fittings from a gas supply shall be made by the responsible person to the gas transporter". [note: "responsible person" does not include the gas retailer]</p> <p>iii. Section 2.5.1 of the Gas Supply Code provides that "an application</p>	<p>There should be consistency in the various Codes and the Regulations with regard to which party would be responsible for turning on or off the gas supply for the retail consumer, and to whom the retail consumer should be making this application. Presently, there is inconsistency across the various Codes and the Regulations in this regard, and overlaps between the obligations of a gas retailer and gas transporter. There is also confusion over whether a "retail consumer" would include a managed capacity customer, as there is inconsistent application in the Codes and Regulations. We also wish to point out that a gas retailer may not have access to the gas meter control valves, as these are owned by the gas transporter.</p> <p>In the premises, we think that the gas retailer should not be obliged</p>

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		<p>to turn on a gas supply at the meter control valve shall be made by the retail consumer or his Designated Representative to the gas retailer...".</p> <p>iv. Regulation 3, paragraph 5 provides that "no person other than an officer or agent of the relevant gas retailer shall turn on the relevant gas meter control valve".</p> <p>v. Regulation 4, paragraph 2 provides that the gas retailer shall immediately discontinue the supply if such supply of gas is unsafe. However, section 3.1.1 of the Gas Supply Code provides that the application to disconnect gas supply for safety reasons is to be made by the responsible person to the gas transporter.</p>	<p>and/or liable for the turning on and discontinuance of gas supply to consumers, but rather the gas retailer should be limited to liaising with the gas transporter for such turning on and discontinuance. We would be grateful for the Authority's clarification on the ownership and access of gas meter control valves and whether, if gas retailers are to be responsible to turn on and off the gas supply, it is intended that access to the gas meter control valves will be granted to gas retailers automatically.</p>
3	4(1)	<p>The Regulations provide that "the relevant gas retailer <u>shall</u> refuse to supply gas.." i.e., the relevant gas retailer must refuse to supply gas if the gas installation or gas appliance to which such supply is made is unsafe for use or does not comply with the Regulations. According to the Gas Retailer Licence, the right of refusal is not mandatory and Condition 17 states that "the Licensee <u>shall not be obliged</u> to commence retailing natural gas...". The said Condition 17 also provides a wider category of events whereby the gas retailer may refuse to supply gas.</p>	<p>For good order, the Regulations and the Licence should be consistent. We suggest that insofar as public safety is concerned, the duty to refuse to supply gas should be mandatory. In respect of the other conditions set out in Condition 17 Paragraph 2 of the Gas Retailer Licence, the gas retailer should be entitled to choose whether or not to supply gas.</p> <p>We also suggest amending the Regulation in the following manner to ensure that the gas installation or gas appliance in question complies not only with these Regulations, but the Act, Codes and directions that may be issued by the Authority.</p> <p>"The relevant gas retailer shall refuse to supply gas to any premises if the gas installation or gas appliance to which such supply is made is unsafe for use or does not comply with <u>the Act</u>, these Regulations, Codes and/or any other relevant legislation, guidelines or directions issued by the Authority."</p>
4	7(5)		<p>To amend as follows:</p> <p>"In the event <u>that</u> the gas transporter disconnects any gas installation or gas fitting..."</p>

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5	8	The term "Singapore Standard CP 51" has been defined in Regulation 1 to mean "Singapore Standard CP 51 published by the Standards, Productivity and Innovation Board...". There is thus no need to repeat the definition of this term.	To amend as follows: "... in compliance with Singapore Standard CP 51 <del>issued by the Standards, Productivity and Innovation Board, or ...</del> "
6	15(2)	This is to be consistent with the first sentence of Paragraph 2, which refers to "gas installation or gas fitting" on the premises.	"(a) take due care to ascertain the existence of any gas supply to the premises and the location of the <u>gas installation or gas fitting</u> within those premises; and  (b) take the necessary precaution to ensure that the work will not cause any damage to the <u>gas installation or gas fitting</u> within those premises."
7	Part VI	<p>According to section 11(1) of the Gas Act, no person shall carry out or offer or undertake to carry out any gas service work unless he is registered as a professional engineer and has a valid practising certificate under the Professional Engineers Act (Cap. 253), or holds a valid gas service worker licence in respect of the specific class of work being carried out or to be carried out. Part VI of the Regulations deal with the licensing of gas service workers.</p> <p>We would be grateful if the Authority could give us reasonable notice prior to the appointed day when the requirement of such gas service worker license shall become effective, so that necessary arrangements may be made to obtain the requisite licences of gas service workers.</p> <p>There are also presently no provisions to allow the automatic granting of gas service worker licences to existing experience gas service workers, and we would request that this be provided for. We are gravely concerned by the requirement to obtain licences in order to carry out gas service work (which is widely defined under the Gas Act), and the mandatory satisfaction of all stated requirements before a gas service worker licence is given. This may result in some of our existing gas workers being unable to qualify for a licence, and accordingly lose their job. This is particularly important given that under section 11(2) of the Gas Act, any person who contravenes subsection (1) shall be guilty of an offence.</p>	

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8	38	The duty to notify the Authority "immediately is unduly onerous, especially given that a breach of this Regulation constitutes an offence under Regulation 41 and the licensed gas service worker may be fined up to \$5,000	"Every licensed gas service worker who changes his address shall, <u>as soon as practically possible</u> <del>immediately</del> notify the Authority in writing of his new address."