



## **DECISION PAPER**

# **PROPOSED MODIFICATIONS TO GAS METERING CODE**

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## **1 Introduction**

- 1.1 The Gas Metering Code (“Code”) sets out the obligations of (i) Gas Shippers to provide Meter Data to the Designated Gas Transporter under the Gas Network Code, (ii) the Designated Gas Transporter who owns Meter Installations and performs balancing and settlement; and (iii) Gas Retailers who retail gas to Retail Customers.
- 1.2 The Code also addresses matters associated with the production, storage, collection, transmission and verification of Meter Data from all Meter Installations and sets out the specifications of meter installations and associated equipment.

## **2 Proposed Modifications**

- 2.1 EMA had proposed modifications to the Code to:-
- a) amend the references to business days to calendar days to avoid ambiguity;
  - b) update the references to standards;
  - c) update the list of test facilities for meters; and
  - d) remove the requirement for the Designated Gas Transporter to retain the meters following the mass meter change exercise for Retail Customers.

## **3 Public Consultation**

- 3.1 Pursuant to Clause 1.6 of the Code, EMA had on 16 May 2016 sought written representations on the proposed modifications to the Code. Written representations from Gas Supply Pte Ltd, Keppel Gas Pte Ltd, PacificLight Power Pte Ltd, Pavilion Gas Pte Ltd and PowerGas Ltd were received when the consultation closed on 13 Jun 2016.

- 3.2 Appendices 1 and 2 set out the modifications to the Code (taking into account the written representations), and EMA's response to the written representations respectively.

#### **4 EMA's Decision**

- 4.1 EMA has carefully considered the written representations from the respondents and has decided to modify the Code as set out in Appendix 1. The proposed Code modifications will come into effect on 5 Oct 2016.

## Appendix 1

### Proposed Modifications to the Gas Safety Code

Modification Ref. No.	Clause*	Original Text	Modified Text
GMC/2016/1	1.1	<b>“Business Day”</b> means, any day other than a Saturday, Sunday, public holiday, or a day on which merchant banks are authorized or required to be closed in Singapore;	Delete definition
GMC/2016/2	1.6.1(f)	A modification to this Code shall not come into force until such time as the Authority has complied with Clause 1.6.1(d), where applicable, and ten (10) Business Days, or such longer period of time as may be specified by the Authority, have elapsed since the date on which the Authority published the modification pursuant to Clause 1.6.1(e).	A modification to this Code shall not come into force until such time as the Authority has complied with Clause 1.6.1(d), where applicable, and ten (10) <del>Business Days</del> <u>calendar days</u> , or such longer period of time as may be specified by the Authority, have elapsed since the date on which the Authority published the modification pursuant to Clause 1.6.1(e).
GMC/2016/3	2.3.1	The Designated Gas Transporter shall ensure that its Meter Installation at any Retail Customer’s premises is installed, commissioned, maintained and operated by a competent person in accordance with the procedures and requirements of the Meter manufacturer, the standards that are specified in Appendix 1 and/or any modification thereto, the Singapore Standard CP51 and all applicable laws, where applicable.	The Designated Gas Transporter shall ensure that its Meter Installation at any Retail Customer’s premises is installed, commissioned, maintained and operated by a competent person in accordance with the procedures and requirements of the Meter manufacturer, the standards that are specified in Appendix 1 and/or any modification thereto, the Singapore Standard <del>CP51</del> <u>SS 608</u> and all applicable laws, where applicable.
GMC/2016/4	2.3.2	In the event of a conflict between the procedures and requirements of the Meter manufacturer, the standards specified in Appendix 1 and Singapore Standard CP51 and all applicable laws, the Singapore Standard CP51 and applicable laws shall prevail.	In the event of a conflict between the procedures and requirements of the Meter manufacturer, the standards specified in Appendix 1 and Singapore Standard <del>CP51</del> <u>SS 608</u> and all applicable laws, the Singapore Standard <del>CP51</del> <u>SS 608</u> and applicable laws shall prevail.

\* With reference to the clause of the Gas Metering Code dated January 2015 as published on EMA’s website.

<b>Modification Ref. No.</b>	<b>Clause*</b>	<b>Original Text</b>	<b>Modified Text</b>
GMC/2016/5	3.3.5(d)	have the capability to compute the heating value of the natural gas for each Balancing Period in accordance with ISO 6976: 1994 or the prevailing latest revision;	have the capability to compute the heating value of the natural gas for each Balancing Period in accordance with ISO 6976: <del>1994</del> or the prevailing latest revision;
GMC/2016/6	5.4.6(b)	retain the removed Meter in a serviceable condition to permit any accuracy testing at the request of the Affected Participants for a minimum of one (1) month. The Designated Gas Transporter shall retain all records and meter readings relating to such Meter and provide reasonable access to the Authority, or any Affected Participants for the Archive Period.	To keep original wordings.
GMC/2016/7	5.4.6(c)	upon request by any Affected Participants, the Designated Gas Transporter shall continue retain the removed Meter in a serviceable condition until the accuracy testing is completed.	To keep original wordings.
GMC/2016/8	Appendix 1	New insertion.	AGA Report No.11 Measurement of Natural Gas by Coriolis Meter

Modification Ref. No.	Clause*	Original Text	Modified Text
GMC/2016/9	Appendix 2	<b>LIST OF TEST FACILITIES FOR METERS</b> 1 Alden, MA, USA 2 Bishop Auckland testing facility, UK 3 Colorado Engineering Experiment Station Inc (CEESI), Colorado, USA 4 LADG , Associated Laboratory for gas flow measurement (issuing from a partnership between high pressure facilities of Gaz de France's research and development facilities and CESAME LNE Ouest. 5 NEL, UK 6 NMI, Holland 7 Ruhrgas, Germany (PTB, Pigsar) 8 TransCanada Calibrations, Canada 9 Southwest Research Institute-Gas Technology Institute (GTI) Metering Research Facility	<b>LIST OF TEST FACILITIES FOR METERS</b> 1 TransCanada Calibrations, Canada 2 CESAME-EXADEBIT, France 3 Pigsar, E.ON Ruhrgas AG, Germany 4 NMI EuroLoop, The Netherlands 5 DNV GL Flow Centre, UK 6 NEL, UK 7 Alden Research Laboratory Inc, USA 8 Colorado Engineering Experiment Station Inc (CEESI), USA 9 Metering Research Facility, Southwest Research Institute, USA

## Appendix 2

### EMA's Response to Written Representations

Modification Ref. No.	Clause *	Written Representations	EMA's Response
GMC/2016/1 GMC/2016/2	1.1 1.6.1(f)	<p><b>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</b></p> <p>We note that the amendment is to standardize references to the calendar days and consistent with EMA's modification for Gas Supply Code. We agree with EMA's proposed modifications.</p> <p><b>PowerGas Ltd</b></p> <p>PowerGas noted that EMA's rationale for the proposed amendment is to standardise the references from business days to calendar days and not to shorten the timeline. As such, the equivalent of ten (10) Business Days should be fourteen (14) calendar days.</p>	<p>Noted.</p> <p>EMA has assessed that the proposed notice period of 10 calendar days remains sufficient for implementation of Code modifications, which is in line with the Gas Supply Code and Gas Safety Code.</p>
GMC/2016/2	1.6.1(f)	<p><b>Keppel Gas Pte Ltd</b></p> <p>"Ten (10) Business Days" would have meant a minimum of 2 full weeks, assuming there are no Public Holidays falling on a weekday; Whereas ten (10) calendar days will be one and a half (1.5) weeks.</p> <p>This change in the shortest timeline for a Code Mod to take effect would result in all affected parties having less time than before to prepare for the change.</p> <p>Keppel Gas is of view that the change should be from "ten (10) Business Days" to "fourteen (14) calendar days" to</p>	<p>EMA has assessed that the proposed notice period of 10 calendar days remains sufficient for implementation of Code modifications, which is in line with the Gas Supply Code and Gas Safety Code.</p>

\* With reference to the clause of the Gas Metering Code dated January 2016 as published on EMA's website.



Modification Ref. No.	Clause*	Written Representations	EMA's Response
		maintain timeline consistency while standardizing the references to calendar days.	
GMC/2016/3 GMC/2016/4	2.3.1 2.3.2	<b>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</b>  We note that the amendment is to update the reference to Singapore Standard CP 51 as it has been superseded by Singapore Standard SS 608. This is in line with EMA's Circular No: RD/G01/2016 issued on 16 February 2016. We agree with EMA's proposed modifications.	Noted.
GMC/2016/5	3.3.5(d)	<b>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</b>  We note that the amendment is to update the version of the standard. We agree with EMA's proposed modification.	Noted.
GMC/2016/6 GMC/2016/7	5.4.6(b) 5.4.6(c)	<b>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</b>  We note that the amendment is to remove the requirement for the Designated Gas Transporter to retain the removed Meter following the age-related meter change operation for Retail Customers. As the Designated Gas Transporter shall retain all records and meter readings relating to the removed Meter and provide reasonable access to the Authority, or any Affected Participants for the Archived Period, we agree with EMA's proposed modification.	The existing Clause 5.4.6 will be retained.
GMC/2016/8	Appendix 1	<b>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</b>  We note that the amendment is to include Coriolis Meter in the Code and we agree with EMA's proposed modification.	Noted.

Modification Ref. No.	Clause*	Written Representations	EMA's Response
GMC/2016/9	Appendix 2	<p><b><i>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</i></b></p> <p>We note that the amendment is to rearrange and update the name of the test facilities and we agree with EMA's proposed modification.</p>	Noted.
Other comments		<p><b><i>Gas Supply Pte Ltd / Pavilion Gas Pte Ltd</i></b></p> <p>We note that EMA's proposed modifications to the Gas Metering Code are consistent with modifications to the Gas Supply Code and update the reference to Singapore Standard SS 608. We thank EMA's initiatives to align the relevant Code of Practice.</p>	Noted.
		<p><b><i>PacificLight Power Pte Ltd</i></b></p> <p>We appreciate the opportunity to comment on the Proposed Modifications to the Gas Metering Code. Please be informed that PLP does not have any comment on the draft consultation paper.</p>	Noted