



Transmission and Distribution System

Performance Report 2010

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Introduction

On 4th July 2008 Gaslink was established as the Independent System Operator for the BGÉ owned Gas Transmission and Distribution systems in Ireland in compliance with the unbundling requirements of the EU Gas Directive 2003/55/EC. BGÉ and Gaslink have entered into an Operating Agreement to fulfil their respective functions regarding the transportation system and to ensure Gaslink has sufficient resources to enable it to fulfil its responsibilities. This agreement was signed by both parties and came into effect on 4th July 2008.

Under this model Gaslink executes most of its functions through the Operating Agreement with Bord Gáis Networks (BGN). The Operating Agreement sets out the functions and services that are provided under contract by BGÉ (and BGN acting on its behalf) to Gaslink. Gaslink oversees BGN's delivery of services on its behalf through monitoring its performance against the terms set out in the Operating Agreement, with governance structures in place to support this. Prior to Gaslink's establishment BGN operated the network.

The Transmission System Operator (TSO) and Distribution System Operator (DSO) licences granted to Gaslink are published on the CER website. Condition 17 of the TSO licence and Condition 19 of the DSO licence require Gaslink to report against a range of criteria in relation to the overall standards of performance of the Transmission and Distribution Systems. The performance standards have been determined by the Commission for Energy regulation (CER) based on performance criteria which Gaslink submitted for approval by the CER¹. These performance criteria may be amended as required by the CER from time to time by notice to Gaslink.

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¹ The Gaslink Performance Criteria was approved by the Commission in August 2009 and can be found at the following link: (<u>CER09133</u>).http://www.cer.ie/en/gas-transmission-network-decision-documents.aspx?article=d6040781-9b0c-4039-b6f0-89ad00dbab6d

Section 1: Transmission System

Transmission System Data

1.1.1. Throughput

Throughput is the total amount of gas transported through the Transportation System in Ireland each year.

Table 1.1.1

	Total Gas Transported (GWh)	Daily Average Transported (GWh)	Peak Day Transported (GWh)
2008	58,680	161	229
2009	56,426	155	225
2010	*62,316	170	258

^{*}The increase in total gas transported from 2009 to 2010 can be partially attributed to extreme weather conditions.

1.1.2. Demand change

Table 1.1.2

	Demand Change (%)	Demand Change (Energy)
2008	+5.58%	+3,103 GWh
2009	-3.8%	-2,254 GWh
2010	+10.44%	+ 5,890 GWh

Table 1.1.2 reflects the increased demand for gas in 2010, up 10.44% from the previous year.

1.1.3. System Efficiency

(a) Delivery

Table 1.1.3 reflects the amount of Gas delivered to Shippers as a percentage of the actual nomination amount.

Table 1.1.3(a)

KPI	Nominated vs.	Actual Performance		ance
	Delivered Target*	2008	2009	2010
Moffat Delivery ±3%	99%	100%	100%	100%
Inch Delivery ±5%	99%	99%	97%	96%

* Target is to be within KPI limits 99% of the time

Low hourly flows at Inch can lead to difficulties meeting this KPI; however upgrades to Middleton compressor station during September 2010 will allow the station to facilitate lower flow rates in future.

(b) Shrinkage

"Shrinkage Gas" means Own Use Gas and/or Natural Gas required to replace Unaccounted For Gas. Table 1.1.3(b) shows Shrinkage Gas attributed to the Rol system as a percentage of throughput.

Table 1.1.3(b)

KPI	Target	2008	2009	2010
Shrinkage as a % of Throughput	N/A	1.37%	1.42%	1.41%

(c) Transmission Meter Read Verification

Transmission Meter Read Verification gives an indication of the number of transmission connected gas points that require meter reading adjustments as a result of failing meter reading validation². Table 1.1.3(c) below notes that 1.3% of all meters verified in 2010 required adjustment.

Table 1.1.3(c)

KPI	Target – No.	2008 – Actual	2009 - Actual	2010 - Actual
	of	No. of	No. of	No. of
	Adjustments	Adjustments	Adjustments	Adjustments
Metering Data Validation	<2% of sites	1.2%	1.3%	1.3%

1.1.4. Unaccounted for Gas (UAG)³

"Unaccounted for Gas" means Natural Gas which is lost or otherwise unaccounted for from the Transportation System or any localized part thereof.

UAG	Target	% *	Energy
2008	±1%	-0.05%	-37 GWh
2009	±1%	0.05%	+33.5 GWh
2010	±1%	0.03%	+17.6 GWh

^{*} This relates to overall system throughput, i.e. section 1.1.1

² Adjustments typically arise as a result of

⁽i) a communications failure – e.g. a site telemetry failure resulting in advances in the site meter not properly communicated to GTMS via SCADA; or

⁽ii) an issue with the meter correction equipment on site.

³ Volume as a percentage of total gas.

1.1.5. Carbon Usage / Emissions

This is a measurement of the tonnes of Carbon Emissions produced in 2010 at each of the compressor stations based on fuel gas consumption

Table 1.1.5

Compression site	2008 (tonnes)	2009 (tonnes)	2010 (tonnes)
Midleton	2,932	3,073	4,932
Beattock	49,788	44,917	47,318
Brighouse	65,171	61,156	71,440

1.1.6. Usage of Inventory Product and Storage

The table below outlines the amount of gas kept in storage during 2010 (Calendar Year). "I/C Inventory Space" relates to the IC2 interconnector with UK, and "Inch" relates to gas that is stored in the depleted Kinsale Gas field.

Table 1.1.6

	2008 (GWh)	2009 (GWh)	2010 (GWh)
I/C Inventory Space Utilised	353	123	42
Inch Export to Storage	801	1069	1468

1.1.7. Capacity bookings

Exit Capacity is the total amount of booked capacity by shippers on the transmission system. As of 31/12/10, 249.15 GWh was reserved on the BGN (T&D) system (Note: This excludes PTL's booking in Scotland of 89.77 GWh)

Breakdown as follows:

Transmission LDM Sites	
(MWh)	156,348,322
Distribution LDM Sites	
(MWh)	1,891,548
Aggregate DM Sites	
(MWh)	4,882,257
Aggregate NDM Supply	
Points(MWh)	86,013,813

The Moffat and Inch Entry Capacity bookings on 31/12/2010 amounted to 342.57 GWh.

Capacity bookings	31/12/2009	31/12/2010
Inch	34.82 GWh	33.53 GWh
Moffat	299.61 GWh	309.04 GWh
Total	334.43GWh	342.57 GWh

1.1.8. Total number of Transmission Connections (by category) at year end plus % change from previous year.

Table 1.1.8

Category	2009 Actual	2010 Actual	% change
Transmission LDM	34	35	2.94%
Transmission DM	17	19	11.76%

1.1.9. Total Length of Pipeline and number of installations on the Transmission System up to December 2010

Table 1.1.9

Length of Onshore Pipeline (km)	2004	Decommissioned (km)	25*
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Length of Offshore Pipeline (km)	411	Decommissioned	0
Total Length of Pipeline (km)	2415	Decommissioned	25
Total No of AGI's	170	Decommissioned	6
Total No Of Compressor Stations	3	Decommissioned	0
Total No of UGI	5	Decommissioned	0
Total No of Valve Pits	22	Decommissioned	4
Total No of UGI's	5	Decommissioned	2
Total No of Installations	205	Decommissioned	12

^{(*} Inclusive of pipe recorded on the system decommissioned in or before 2010)

1.1.10. Performance Standards

(a) BGN Transmission Service Standards – Performance 2010

Table 1.1.10(a)

		Actual
Customer Commitments	Performance Target	Performance
Maintenance Days ⁴		
Unscheduled Maintenance /		
Interruptions	Zero	0
Interruptions due to maintenance	5	0
Safety & Quality		
Reportable Safety Incidents	Zero	0
		99.93%(equates) to
Communications & Instrumentation		approx 6 hours
GTMS System Availability	99.8%	downtime in the year

(b) System balancing:

A Balancing Action means a Balancing Gas Buy or a Balancing Gas Sell under a Balancing Gas contract in respect of a Day is required.

Table 1.1.10 (b)

	Target	2008	2009	2010
System Balancing Actions	48 (12 per Qtr.)	12	20	37
Shipper Imbalance as % of total flow*	N/A	0.26%	0.25%	0.24%

^{*} This relates to overall system throughput, i.e. section 1.1.1

⁴ See Code of Operations Part G Section 5.1.3(b)

1.2 GPRO

The GPRO is a register of Gas Points that is operated and maintained by BGN on behalf of Gaslink. Table 1.2 sets out the number of Large Daily Metered, Daily Metered, and Non Daily Metered registered Gas Points in 2010 as well as requests to change shipper and provides Historical Consumption

Table 1.2

Category	GasPoints* Registered @ 31 Dec 2010	Total Gas Points Registered during 2010	Total Gas Points De- registere d during 2010	Tariff Exempt NDM Supply Points @ 31 Dec 2010	Total Tariff Exempt NDM Supply Points during 2010	Change of Shippers Jan-Dec 2010	Historical Consumption Requests Jan –Dec 2010
LDM	77	2	N/A	N/A	N/A	2	8
DM	225	11	N/A	N/A	N/A	37	98
NDM I/C	23,784	894	285	835	305	3,861	1,850
NDM	619,787	8,147	2,511	4,977	2,651	90,037	N/A
Domestic							
Total	643,873	9,041	2,796	5,812	2,956	93,937	1,956

(* Transmission and Distribution)

1.3 Achievement of Capital Programme

Table 1.3.1

Reinforcement	Comment
Ballinacurra Bridge AGI Upgrade	Commissioned
AGI Capacity Upgrades (5 number)	Under Construction

Table 1.3.2

Refurbishment	Comment
Operations Upgrades	Under Construction
Kilshane Block Valve	Under Construction
Midleton Recycle Valve	Commissioned
Midleton Control System	Commissioned
Dublin 4 Pipeline Replacement	Under Construction
Ballough Bypass	Design Stage
Cork Dublin Pipeline - RDX142 Civil Work	Completed
Remote Cathodic Protection Measurement	Under Construction

Table 1.3.3

Third Party	Comment
M20 Motorway Diversions	Design Stage

Table 1.3.4

Interconnectors	Comment
Beattock Volume Control	Design Stage
Brighouse Bay Bypass	Commissioned
Brighouse Bay Upgrades	Under Construction

Table 1.3.5

New Supply	Comment
Newtownfane to Haynestown (Mullagharlin)	Under Review
Raheen AGI, Supply to Tipperary Town	Under Construction
Burrencarragh AGI, Kells Upgrade	Under Construction
Compressed Natural Gas Facility, Finglas	Design Stage
Tarbert Power Station	Preliminary Engineering
Great Island Power Station	Design Stage
Kilkenny OCGT	Design Stage

1.4 Gas Safety

1.4.1 High Level Safety Statistics

1.4.1.1 Introduction

This section of the report is an extract from the report submitted to CER under the natural gas safety regulatory framework (the 'Framework'). All information has been provided to the best ability of BGN at the time of submittal to the CER. The report includes Key Performance Indicator (KPI) measures and statistics that have been under continuous monitoring and improvement during 2010.

1.4.1.2 Key Performance Indicators

1.4.1.2.1 High Level Transmission Safety KPI's

The reference number (ref: 1 - 6) denotes KPI grouping under the Six Key Safety Regulatory Objectives.

TRANSMISSION UNDERTAKINGS & KPI's:

	ANSMISSION DERTAKINGS		2008	2009	2010	Notes:
t.1	Pressure Control	% of SCADA system availability	100%	100%	100%	
t.2	Gas Quality (cv / wobbe)	% of time, monitoring systems operational	100%	100%	100%	
t.3	Gas Emergency Exercises	No. of emergency exercises v's Plan	3 of 3	2 of 2	3 of 4	Planned exercise postponed to early 2011 due to adverse weather conditions for month of December.

TRANSMISSION KPI's:

		VDI Compliance Manalis		Transn	nission		
		КРІ	Compliance Monitor	2008	2009	2010	Notes:
1	Α	Public Reported Escapes	Total Reported Escapes	7	0	1	Refer to item 1C below.
	В	Third Party Damage	Development enquiries requiring action	390	319	466	Increased and targeted Third Party Damage Prevention
			Total detected encroachment events	26	30	40	initiatives in 2010. ⁵
	С	Transmission Pipelines	Line breaks (major leakage) Line damaged	0	0	0	
			(sustainable level of leakage) Line damaged (no gas	0	0	1 1 ⁶	
			leakage)	1	0	1'	
2	Α	Pressure Control	Pressure drops leading to supply interruptions Pressure greater than 1.1 times Maximum	0	0	0	
			Operating Pressure (1.1 x MOP)	0	0	0	
	В	Gas Outages	No. of Unplanned Outages	0	0	0	

⁵ See item 2.7.2 for commentary in relation to TPDA initiatives ⁶ These relate to the Curraleigh West Third Party Incident in May 2010

TRANSMISSION KPI's:

				Transn	nission		
		KPI	Compliance Monitor	2008	2009	2010	Notes:
3	Α	Gas Quality (C.V., Wobbe)	Non compliant events	0	0	0	
4	А	Gas Supply Emergencies (Transmission Related)	Local Gas Supply Emergencies 1,000 - 9,999 customers affected NGEM Emergencies > 10,000 customers affected	0	0	0	
5	А	Incidents	Gas Related Incidents	0	0	0	

1.4.1.2.2 Analysis of 2010 Transmission Safety KPI's

Commentary on the high level KPI's is presented under the six key Regulatory Objectives, which support the overall Strategic Objective of the Framework. This is consistent with one of the fundamental principles of the Framework: that gas safety risks must be mitigated to a level that is deemed to be as low as reasonably practical (ALARP).

1.4.1.2.2.1 Minimising the Risk of Loss of Containment

The high level KPI's, over the period, demonstrate consistent performance in this area. Of particular note are:

- 1.a. There was one Public Reported Escape in 2010. This related to a Third Party Damage incident on the Curraleigh West to Middleton line.
- 1.b. Third Party Damage Targeted Third Party Damage Prevention initiatives, such as promotion of "Dial-before-you-dig" process in media and other areas, affected increase in development enquiries requiring action (2009: 319; 2010: 466) and detected encroachments (2009: 30; 2010: 40).
- 1.c. Transmission Pipelines Line breaks remained at zero in 2008, 2009 and again in 2010. There were two number (2) line damage events in 2010. Damage resulting from a Third Party Damage event identified in May 2010 on the Curraleigh West to Midleton line and a related damage event on the same pipeline identified in Q3 2010. The second event in Q3 2010 was a deformation of a section of pipeline (no gas escape) which occurred and was identified during the works to recommission the pipeline following the original event in May 2010. The damaged sections were cut out and repaired. The line was returned to operating pressure."

1.4.1.2.2.2 Maintaining Safe System Operating Pressure

All KPI's have demonstrated a very high performance with continuous high performance in % availability of SCADA maintained at 100%.

1.4.1.2.2.3 Minimising the Risk of Injecting Gas of Non-Conforming Quality

The KPI's have demonstrated there were no gas quality (C.V., Wobbe) non-compliant results. Odour tests planned versus tests undertaken were 100% for those planned for 2010 despite the adverse weather conditions in January and December of 2010.

1.4.1.2.2.4 Providing an Efficient and Coordinated Response to Gas Emergencies

No gas supply emergencies to report.

1.4.1.2.2.5 Minimising the Safety Risks Associated with the Utilisation of Gas

No incidents to report.

1.4.1.2.3 Review of 2008, 2009 and 2010 against Strategic Objective

In line with the overall **strategic objective** of the Framework, BGN intend to continue:

To ensure that adequate measures are taken to protect life and property from the dangers associated with natural gas by ensuring that gas related activities within the scope of Bord Gáis Networks' responsibilities are carried out in a safe manner.

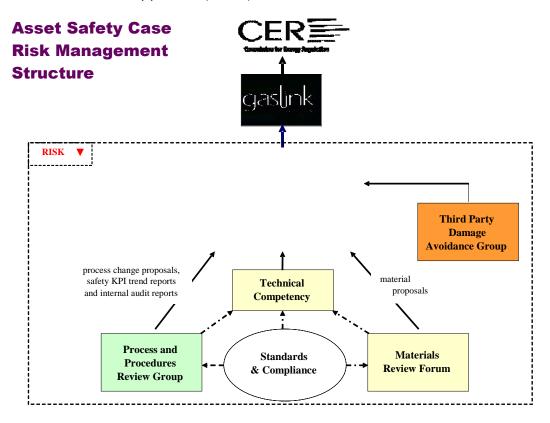
Achieving the overall strategic objective of the Framework is the desired safety outcomes of no natural gas related incidents, injuries or fatalities.

Natural Gas reportable Incidents:	2008	2009	2010
Total Incidents:			
Fire	0	0	0
Explosion	0	0	0
Injuries:			
Fire	0	0	0
Explosion	0	0	0
Fatalities:			
Fire	0	0	0
Explosion	0	0	0

1.4.1.3 Adoption of Natural Gas Safety Regulatory Framework

1.4.1.3.1 Risk Management Structure

BGN operate the Asset/Safety Case Risk Management Structure as illustrated below. The primary objective of this structure is to manage gas safety risks to a level that is deemed to be as low as reasonably practical (ALARP).



1.4.1.3.1.1 Asset/ Safety Case Risk Review Committee

The Asset/Safety Case Risk Review Committee consists of Networks cross functions management, and is responsible for the review of findings and proposals from subcommittees.

The primary objectives of the Committee are to report on the safety KPI's, propose Safety Case material and process changes. The Committee also reviews and manages the safety case risk register, identifies new and emerging risks, coordinates cross functional activities ensuring development and maintenance of effective efficient controls and makes recommendations on procedures and processes to reflect business practice and needs. Monthly reports are provided to Senior BGN Management and quarterly reports to Gaslink.

1.4.1.3.1.2 Risk Review Sub-Committees

The "Standards & Compliance" group will consist of Bord Gáis Networks representatives on ISO/CEN/Marcogaz/NSAI technical gas committees. The primary function of this group is to monitor developments of gas technical standards and legislation to ensure compliance of

Bord Gáis Networks processes and procedures, and BGN materials selection and procurement with the relevant standards and legislative requirements.

All subcommittees are common to Transmission and Distribution except the "Materials Review Forum" which review materials, tooling and equipment relating to the specific transmission or distribution network.

1.4.1.4 Update on Safety Case

Gaslink's safety case was submitted to the CER and approved in June 2009. Within the safety case framework a quarterly KPI report is submitted to CER for review. The primary objectives of the Safety Case document are: the safe control and operation of the transmission network; to ensure that BGN adequately manages the life cycle of its assets; that it sets out the emergency response and activation of the NGEM; and that adequate communication systems, staff and risk management practices are in place. It provides information to demonstrate that BGN works with all other bodies that have safety duties and ensures arrangements are in place for dealing with gas escapes and investigations into incidents.

During 2010 submissions were made to the CER with respect to the Networks reorganisation programme (Networks Transformation Programme) and the Registered Gas Installers Ireland (RGII).

1.4.1.5 Update on National Gas Emergency Manager activities

Pursuant to SI 697 of 2007 the CER appointed Gaslink as the National Gas Emergency Manager and approved the Natural Gas Emergency Plan submitted by Gaslink to the CER in November 2008. The NGEP was rolled out and published on the Gaslink website in Q2 2009.

1.4.1.6 Compliance with Codes of Practice

Codes of Practice

There are no specific Codes of Practice for Transmission. See Section 1.4.1.3 in relation to the Natural Gas Safety Framework.

1.4.1.7 Compliance with Licence Conditions

Both Gaslink and BGN have system operator and system owner licences respectively. Both organisations maintain a log in which reported breaches of compliance are noted, investigated and reported on. There were no material breaches of the Transmission Asset Owner Licence Conditions or the Transmission Operator Licences during 2010.

⁷ The CER will consider updating Gaslink's agreed Performance Criteria to reflect this.

1.4.1.8 Other improvements/initiatives during the year

1.4.1.8.1 Code Modifications

The Following Code Modification was implemented during 2010:

A040 DM Supply Point Capacity (SPC) mid year reduction request

The following Code Modifications were approved and implemented during 2010:

A041 PPM Shipper Registration Exception

A042 Change in Daily Capacity Booking Window

The following Code Modification was proposed during 2010 and is currently being developed:

A043 - Virtual Moffat Reverse Flow

Section 2: Distribution System

2.1 Customer Service (Performance against Customer Charter)

As service provider to Gaslink, BGN connects all natural gas customers to the network and is responsible for carrying out related work at customer premises. The services provided include: safety and emergency response, pipeline service laying and modification, and meter installations/alterations. Every effort is made to provide services in a prompt, efficient, and safe manner and to a high standard. BGN continuously seeks to improve the levels of service that it provides. The Customer Charter provides assurances to customers regarding the standards to which these services are provided. In certain circumstances, BGN will provide compensation for failing to meet these standards, where the customer makes a claim.

Results for 2010 were as follows:

Bord Gais Networks	Customer C	harter Service	Standards -	Perforn	nance 2010
Customer Commitments	Total Occurrence	Planned Performance Level Compliance	% Achieved	No of claims Made	Compensation Paid
Administrative Standards					
Call Handling Answered <20 secs [See Section 2.1.2.1]	332,780	80.00%	81.90%		
Abandoned by Customer < 7% [See Section 2.1.2.1]	35,540	7.00%	10.4%*		
Mystery Shopper Survey Calls	1,006		95.00%		
Call follow-up surveys	996		95.00%		
Quotation issuing [See Section 2.1.2.2]					
Quotations issued <7 w/day Complaint resolution [See	4,608	100.00%	99.99%		
Section 2.1.2.3]					
10 w/day	1,667	85.00%	99.30%		
30 w/day	320	85.00%	99.40%		
Payment guarantee [See Section 2.1.2.4]					
Compensation/refunds paid	61	100.00%	92%	5	€175
Service Delivery Standards Appointment granting [See Section 2.1.3.1]					
5 w/day	36,900	100.00%	100.00%		
20 w/day	3,652	100.00%	99.80%		
Appointments kept [See Section 2.1.3.2]					
5 w/day	35,009	100.00%	97.30%	28	€1,500
20 w/day	3,622	100.00%	96.50%		
Reinstatement [See Section 2.1.3.3 and 2.1.3.4.]					
Temporary <1 w/day	5,002	100.00%	99.50%		
Permanent <20 w/day	4,999	100.00%	94.00%		
Gas Supply Standards Supply restoration [See Section 2.1.4.2]					
Gas on <24.00 next day	12,568	100.00%	88.50%	28	€7,000
Emergency Response [See Section 2.1.4.1]	12,300	133.00/0	33.3070	20	27,000
Attend site < 1hr	19,430	97.00%	99%		

^{*} Adjusted abandonment (>20 secs) 1.5%

2.1.1 Customer Service – Performance on Charter Commitments

BGN's performance across a range of customer service perspectives is measured relative to customer charter standards and planned performance levels (PPL's) agreed with the CER and published in March 2007. An updated version of the customer charter document was published in 2009 but the commitments remained as originally agreed.

^{**}Performance affected in the last quarter due to adverse weather conditions.

2.1.2 Administrative Standards

2.1.2.1 Call Handling

Performance for 2010 as a whole in respect of 333k calls handled was 81.9% (Planned Performance Level (PPL) @ 80% minimum) answering within 20 seconds and 10.4% abandonment (PPL @ 7% maximum).

Analysis of 2010 call abandonment reveals that the majority of calls are abandoned within the BGN service criteria (86% < 20 seconds). Whilst headline abandonment for the year was 10.4% the vast majority of abandons occurred within the service standard, i.e. within 20 seconds, and the net abandonment level was 1.5% in 2010.

2.1.2.2 Quotation Issuing

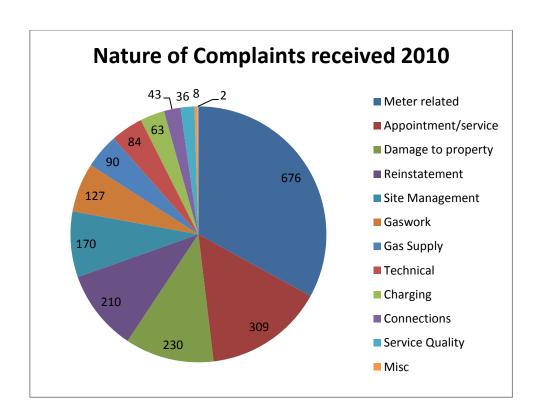
2010 quotation performance remained highly compliant (99.9%) versus the PPL of seven work/day turnaround and with average turnaround of 3 days with overall only 7 of 4608 quotations issuing outside the standard.

2.1.2.3 Complaint Resolution

Complaints registered in 2010 were down 40% on the volume registered in 2009 with a total of 2,048 created. Resolution compliance was at 99.3% (PPL @ 85% minimum) in respect of the 1,987 complaints closed-out throughout 2010, with only 14 complaints resolved late. Average time to resolve was 5wk/days in respect of 10-day type complaints and 10 wk/days in respect of 30-day type.

The nature and relative frequency of complaint types is registered below;

Nature of		
complaint	Number	Percentage
Meter related	676	33%
Appointment/service	309	15%
Damage to property	230	11%
Reinstatement	210	10%
Site Management	170	8%
Gaswork	127	6%
Gas Supply	90	4%
Technical	84	4%
Charging	63	3%
Connections	43	2%
Service Quality	36	2%
Misc	8	0%
Notice of works	2	0%
Total	2048	100%



2.1.2.4 Compensation

Charter compensations for 2010 totalled 61 approved (of 67 claimed, 1 rejected, 5 carried to 2011) for an aggregate payout of €8,625. Of the 61 compensation payments made 28 related to broken appointments and 28 to supply restoration delays. 5 of these payments were made outside the 10 day criteria and therefore a further 5 compensation payments were made for late payment, bringing the total to 61.

Compensation claims					
	2010	2009			
Paid	61	22			
Rejected	1	4			
> 10 working days	5	0			
Payment ca	ategory				
	2010	2009			
Supply Restoration	2010 28	2009 14			
Supply Restoration Broken Appointment					
• • •	28	14			
Broken Appointment	28 28	14			
Broken Appointment	28 28	14			

2.1.3 Service Delivery Standards

2.1.3.1 Appointment Granting

Appointment requests in 2010 were substantially higher than 2009 (meter appointment requests at 36,900 up 18% and service appointment requests at 3,652 up 28%). Throughout 2010 only 1 of almost 37,000 metering appointments were granted outside the 5 day criteria and only 5 of over 3600 service appointments was granted outside the 4 wk/week standard.

2.1.3.2 Appointment Delivery

2010 performance achieved 97%. This 1 point reduction on 2009 was due to the adverse weather conditions in December 2010. In 2010 961, of more than 35,000 metering appointments, and 127, of over 3600 service lay appointments, were not delivered as booked.

2.1.3.3 Temporary Reinstatement⁸

Performance in 2010 was highly compliant with 99.5% of over 5000 temporary reinstatements conducted within the 24hr standard.

2.1.3.4 Permanent Reinstatement

94% of almost 5000 permanent reinstatement activities during 2010 were performed within the 20 wk/day PPL.

2.1.4 Gas Supply Standards

2.1.4.1 Emergency Response

193 of 19,430 responses in 2010 were outside the 1 hr maximum standard for 99% compliant performance, with 177 of these occurring in January and December 2010 due to adverse weather conditions. The average response time across all responses was 26 minutes. 3,906 of these escapes were internal, 3,668 external and 11,856 were no traces.

2.1.4.2 Interruption Notification and Supply Restoration

The target set out in BGN's Customer Charter approved by the CER is to restore gas supply by midnight of the following day in the event of an unplanned interruption. Of the 12,568 no gas incidents (i.e. unplanned interruptions), 1,451 were restored outside the 24 hour criteria, making the YTD performance 88.5%overall for 2010. Performance was affected during December 2010 due to the increase in the number of no gas incidents directly relating to the adverse weather conditions.

⁻

⁸Once a gas service has been installed in an excavation reinstatement of the ground takes three stages: 1. Back filling, 2. Temporary reinstatement (within 24 hours) and 3. Permanent reinstatement (within 20 working days). Once the excavation is back filled, it is temporarily reinstated with tarmacadam to make safe. The purpose of temporarily reinstating the ground is to allow time for the backfill in the excavation to settle so there is a lower chance of the reinstatement sinking in the future. Permanent reinstatement is then carried out in the original material of the site e.g. concrete, cobble lock, etc, (within 20 working days).

2.2 Distribution System Data

2.2.1 Annual total, annual daily average and peak day flows and comparison to previous year

Dx DM I/C		2009	2010	% Change
Annual Total	MWh	2,819,773	2,944,691	4.43%
Annual Daily Average	MWh	7,725	8,068	4.44%
Peak Day Flow	MWh	11,196	12,327	10.10%
Dx NDM I/C				
Annual Total	MWh	3,976,354	4,138,249	4.07%
Annual Daily Average	MWh	10,894	11,338	4.08%
Peak Day Flow	MWh			
Dx NDM RES				
Annual Total	MWh	8,056,248	9,152,674	13.61%
Annual Daily Average	MWh	22,072	25,076	13.61%
Peak Day Flow	MWh			
Dx NDM Total				
Annual Total	MWh	12,032,602	13,290,922	10.46%
Annual Daily Average	MWh	32,966	36,413	10.46%
Peak Day Flow	MWh	79,673	95,216	19.51%
Dx Total				
Annual Total	MWh	14,852,375	16,235,613	9.31%
Annual Daily Average	MWh	40,691	44,481	9.31%
Peak Day Flow	MWh	90,693	107,180	18.18%

2.2.2 Shrinkage

Shrinkage as a % of total distribution throughput in 2010 = 1.0% (compared to 1.1% in 2009)

2.2.3 Total number of Connections (by category) at year end plus % change from previous year.

Connections	2009	2010	% Change
Dx DM I/C - Connects	221	209	-5.43%
Dx NDM I/C - Connects	22,697	23,939	5.47%
Dx NDM RES - Connects	612,325	618,796	1.06%
Dx Total - Connects	635,243	642,944	1.21%

2.3 Total length of pipe in distribution system

Distribution Network Lengths - Systems Lengths at end 2010* (Material)

	PE 2010	PE 2009	Cast 2010	Cast 2009	Other 2010**	Other 2009 **	Totals 2010	Totals 2009
Eastern F	Region (inc	l. Carlow &	Kilkenny)					
Total Length (km)	7657	7600	1	1	59	66	7717	7667
Cork								
Total Length (km)	1525	1512	0.1	0.1	7	8	1532	1520
Limerick	& S.E.							
Total Length (km)	1238	1222	0	0	8	8	1246	1230
Galway 8	k West							
Total Length (km)	372	364	0	0	1	1	373	365

PE = Polyethylene cast iron

^{**}Other materials are Steel, Ductile Iron, Wrought Iron and Gun Barrel.

	% Ratio - PE: Cast: Other
Eastern Region (incl. Carlow & Kilkenny)	99 : 0 : 1
Cork	99.5 : 0 : 0.5
Limerick and S.E. Midlands	99.3 : 0 : 0.7
Galway and West	99.7 : 0 : 0.3
Nationally	99.3 : 0 : 0.8

National Totals	PE	Cast	Other
Total Length by Material Nationally (km)	10792	1	75
Total Distribution System Length (km)	10868		

^{*}Distribution Pipes of Diameter 63mm and greater.

2.4 Achievement of Capital Programme

2.4.1 Cast iron mains replacement progress

From 2004 to 2009, a total of 1,233km of old metallic mains have now been replaced, 95% of which were in the Greater Dublin Area and 5% in Cork. The programme included the renewal of approximately 49,000 old metallic services and the transfer of 34,000 existing PE services. In addition, approximately 65,000 internal inspections were conducted during the course of the programme to assure that it was safe to reintroduce gas. Piece meal renewal and/or investigative works are to continue into 2011 to eliminate isolated sections and verify records.

2.5 New connections during year (by category)

Meters	2009	2010
One off residential	3997	3467
New Housing	8267	2941
Industrial / Commercial	1072	738

Capital Programme	Total 2010	Total 2010	%
Capital Programme			
	Actual	Allowance	Achieved
Total Services ⁹ (nos)	4572	26477	17%
Total New Mains kms	77	143	54%
Total Mains Renewed	0	3	0%

17 % represents the actual service connections versus those projected as part of the CER's 2007 5-year revenue review. The difference is reflective of the drop off in demand in the new housing area.

The above table shows that BGN laid 46% less main. This is accounted for in the drop off in new housing mains and services as a result of the economic downturn.

2.6 Update on new towns receiving gas

BGN has carried out numerous feasibility studies on various towns to assess the economic viability of connecting the selected towns to the Distribution Network. These studies are carried out in line with a BGN Connection Policy approved by the CER in April 2006. At present BGN has three phases on the New Towns projects as follows:

(i) New Towns Phase I: Mayo-Galway

(ii) New Towns Phase II: Mayo, Galway, Tipperary and Kildare

(iii) New Towns Phase III: Cork, Tipperary and Meath

⁹ These are residential one off housing (includes those in mature areas and new builds), new housing (estate, apartments etc.) and Industrial/ Commercial connections.

New Towns Phase I and II are at construction stage. New Towns Phase III is at tender stage.

The following is a brief update on each Phase.

2.6.1 New Towns Phase I

To date, seven towns (Castlebar, Westport, Craughwell, Headford, Ballina, Claremorris, and Crossmolina) have been connected to the Distribution Network under Phase I. The remaining towns (Tuam, Athenry, Ballyhaunis, and Knock) await the signing of key anchor loads prior to construction commencement.

2.6.2 New Towns Phase II

In 2009, four towns Gort, Loughrea, Ballinrobe and Monasterevin and in 2010, one town, Cahir, were completed, and connected to the Distribution Network.

2.6.3 New Towns Phase III

In 2010, construction commenced on connecting two towns, Kinsale and Tipperary, to the Distribution Network – these two towns will be fully connected during 2011. BGN has prepared a programme to connect Kells to the Network in 2011. Innishannon was canvassed prior to the construction of the feeder main to Kinsale. There was not a significant appetite for connections so the infrastructure was not extended into the town.

2.6.4 2010 Reinforcement Performance Review

All of the planned Reinforcement projects were completed on programme and within budget for 2010. There were 45 projects in total.

- 1. Palmerston Park Reinforcement
- 2. Meath Road Reinforcement
- 3. Beaumont Road Reinforcement
- 4. Brownsbarn Reinforcement
- 5. Ringaskiddy Phase 2
- 6. Limerick Reinforcement
- 7. Sallynoggin Reinforcement
- 8. Balcurris Road DRI
- 9. Ardreigh Bridge Reinforcement
- 10. Loughshinny AGI Reinforcement
- 11. Ard Scoil Rís DRI
- 12. LIT Reinforcement
- 13. Granville Road Reinforcement
- 14. Nangor AGI outlet upgrade
- 15. Castle Avenue Block DRI
- 16. St. Annes Park Reinforcement
- 17. Sandycove Road link

- 18. Allenton Crescent
- 19. Temp DRI -Offington
- 20. Dundella Park
- 21. Athy Road Carlow Reinf.
- 22. Harpurs Lanes DRI
- 23. Wellington Quay
- 24. Castleknock Rd Valve Leak
- 25. Temp DRI Sallynoggin
- 26. Naas LP Reinforcement
- 27. Iveagh Fitness Club
- 28. UL North Campus LP
- 29. Malahide Demesne Reinforcement
- 30. Cherryfield Ave Reinforcement
- 31. Naas Culvert
- 32. Balbutcher Lane Reinforcement
- 33. Dock Road Tie-in
- 34. South Lotts Road Crossing
- 35. Rossbrien Road Tie-in
- 36. River Suir Horizontal Directional Drill
- 37. Booterstown Reinforcement *
- 38. Sandymount to Merrion Reinf*
- 39. Stradbrook to Glenageary *
- 40. Castle Park Reinforcement *
- 41. Balkill Road Reinforcement *
- 42. Maywood Avenue DRI *
- 43. Offington DRI *
- 44. Clanbrassil Street Crossing *
- 45. Johnstown Park Reinforcement

- A total of 26km of reinforcement mains were laid in 2010.
- The Horizontal Directional Drill in Waterford consisted of 600m drill under the River Suir (the largest drilling operation ever undertaken on the distribution network).
- Limerick reinforcement project was the largest project undertaken during 2010 and consisted of 4.2km of 315PE.
- 2010 Reinforcement Programme was completed within the budget.

2.7 Gas Safety

2.7.1 Introduction

All information has been provided to the best ability of BGN at the time of submittal to the CER. The report includes Key Performance Indicator (KPI) measures and statistics that have been under continuous monitoring and improvement during the reported period of 2010. Safety performance is a key priority for both Gaslink and BGN.

^{*} Reinforcement project from 2009 programme constructed in 2010.

2.7.2 New Initiatives

The Third Party Damage Avoidance Group was set up to target initiatives in minimising third party damage to the gas network (see section 1.4.1.3 the updated Asset/Safety Case Risk Management Structure).

In Q4 2009 BGN commenced targeting plant hire companies to ensure any individual taking out plant hire equipment would be prompted to notify BGN of any impending works planned. The focus of this initiative was to ensure that individuals would not damage gas pipelines whilst digging/excavating with plant hire equipment. This initiative was continued throughout 2010.

Network mapping data exchange agreements with utilities, contractors and local authorities were extended to two further parties in 2010.

BGN issued correspondence to all domestic consumers to heighten safety risk awareness when initiating new build/extension works to their homes.

BGN in close conjunction with the Construction Industry Federation (C.I.F.) targeted and issued correspondence to demolition companies highlighting the correct processes and procedures to follow prior to commencement of works on site.

During 2010, BGN issued a letter and 2011 calendar to landowners advising them of actions to be taken on their land prior to carrying out any civil works.

2.7.3 Key Performance Indicators

2.7.3.1 High Level Distribution Safety KPI's

The reference number (ref: 1 - 6) denotes KPI grouping under the Six Key Safety Regulatory Objectives. Consult section 3.2 for detailed analysis.

DISTRIBUTION UNDERTAKINGS & KPI's:

DISTRIB	UTION UNDERTAKINGS		2008	2009	2010	Notes:
d.1.1 d.1.2	Replacement Mains	Cast Iron Remaining Cast Iron Replaced	231 km 263 km	1 km 230 km	1 km 1 km	99.9% Renewals programme complete with exception of short residual sections replaced on discovery.
d.2	Gas Emergency Exercises	No. of emergency exercises V's Plan	2 of 2	3 of 3	1 of 2	Exercise planned for December postponed to early 2011 due to adverse weather conditions in December.

Ref	Subject	High Level KPI	Distributi		2010	Notes:
Α	Public Reported Escapes	No. of External Escapes No. of Internal Escapes	3716 4710	3350 4464	3668 3906	Increase due to adverse weather conditions in January and December 2010.
В	Third Party Damage	No. of Main Damages	202	113	62	Decreased due to drop in construction industry activity and targeted Third Party
		No. of Service Damages	900	572	461	Damage Prevention initiatives in 2010.
С	Gas in Buildings	No. of Gas in Buildings	4	4	0	No gas in building events in 2010.
D	Evacuations	No. of BGN initiated evacuations	2	3	3	
Α	Gas Outages	No. of unplanned outages affecting < 15 < 100 < 250	5 4 1	9 0 0	5 0 0	
А	Gas Supply Emergencies	No. of gas supply emergencies % attended within one	0 99.9994	0 99.9164	0 99.0171	Slight decrease due to adverse weather conditions in January
В	Public Reported Escapes	hour	%	%	%	and December 2010.
		No. of reportable gas related incidents - downstream				
A	Incidents	of the meter	3	3	3	
В	Carbon Monoxide	CO incidents	1	0	0	
	A B A	A Public Reported Escapes B Third Party Damage C Gas in Buildings D Evacuations A Gas Outages A Gas Supply Emergencies B Public Reported Escapes	No. of External Escapes No. of Internal Escapes No. of Internal Escapes B Third Party Damage No. of Service Damages No. of Gas in Buildings No. of BGN initiated evacuations A Gas Outages A Gas Supply Emergencies A Gas Supply Emergencies % attended within one hour No. of reportable gas related incidents downstream of the meter	A Public Reported Escapes No. of External Escapes No. of Internal Escapes No. of Main Damages No. of Service Damages No. of Gas in Buildings N	No. of External Escapes No. of Internal Escapes No. of Internal Escapes A Third Party Damage No. of Service Damages Pool S72 C Gas in Buildings No. of Gas in Buildings No. of Gas in Buildings A No. of Gas in Buildings No. of Gas in Buildings A A No. of Gas in Buildings A A Incidents A Incident A Inciden	No. of External Escapes No. of External Escapes No. of External Escapes No. of Internal Escapes No. of Main Damages No. of Service Damages No. of Service Damages No. of Gas in Buildings No. of Gas in Buildings No. of Gas in Buildings No. of BGN initiated evacuations No. of unplanned outages affecting < 15

			High Level				
	Ref	Subject	KPI	Distribut	ion:		Notes:
				2008	2009	2010	
			No. of				
			emergency				
			calls received				
			via the 24-				
			hour				
			emergency				
			telephone				
			number (1800				
5	Α	Emergency Reports	20 50 50)	20,186	20,333	19,663	
			No. of CO-				
			related calls				
			received via				
			the 'Carbon				
			Monoxide				
			Helpline				
			(1800 79 79				
	В	Carbon Monoxide Helpline	79)	3005	2427	1847	
			No. of calls				The number of received
			received via				calls to 'Dial-Before-
			the 'Dial-				You-Dig' increased in
			Before-You-				2010 due to increased
			Dig'				advertising and public
			telephone				awareness campaigns such as Third Party
			number (1800				Damage Prevention
	С	Third Party Damage	427 747)	4699	5135	6544	initiative in 2010.

2.7.3.2 Summary of 2010 Distribution Safety KPI's:

Commentary on the high level KPI's is presented under the six key Regulatory Objectives, which support the overall Strategic Objective of the Framework. This is consistent with one of the fundamental principles of the Framework: that gas safety risks must be mitigated by the undertaking to a level that is deemed to be as low as reasonably practical (ALARP).

2.7.3.2.1 Minimising the Risk of Loss of Containment

The majority of high level KPI's, over the period reported demonstrates considerable improvement in most areas. Please note commentary below against annual trends:

1.a. - Public Reported Escapes

The number of internal escapes in 2010 was 3906 down 558 from 2009 (4464) and down 804 from 2008 (4710);

The number of external escapes in 2010 was 3668 up 318 from 2009 (3350) and down 48 on 2008 (3716). This was due to adverse weather conditions in January and December 2010.

- 1.b. Third Party Damage No. of Damages in 2010 was 461 events (down 439 from 2008 and down 111 from 2009);
- 1.c. Gas in Buildings No. of Events in 2010 was zero (down 4 from 2008 and 2009);

2.7.3.2.2 Maintaining Safe System Operating Pressure

The high level KPI's demonstrate considerable improvement over the period reported. Of particular note is:

2.a. - Gas Outages – No. of unplanned outages down to 5 events (all less that 15 dwellings) down by 4 events on 2009 figures.

2.7.3.2.3 Minimising the Risk of Injecting Gas of Non-Conforming Quality

All KPI's have demonstrated there were zero effective non-conformances outside criteria.

The one non compliant event reported was equipment related and not as a result on non-conforming gas quality.

2.7.3.2.4 Providing an Efficient and Coordinated Response to Gas Emergencies

The high level KPI's demonstrate consistent high performance and increased improvement over the period reported. Of particular note is:

- 3.a. Gas Supply Emergencies No. of gas supply emergencies (Zero for 2008, 2009 and 2010);
- 3.b. Public Reported Escapes % attended within one hour (2008, 2009 and 2010 statistics retained above 99%)

2.7.3.2.5 Minimising the Safety Risks Associated with the Utilisation of Gas

The high level KPI's demonstrate considerable improvement over the period reported, in most areas. Of particular note are:

- 4.a. Reportable Incidents which were gas related that were attended by BGN totalled 3 for 2010. See section 2.7.3.3 for further detail.
- 4.b. Zero natural gas Carbon Monoxide incidents in 2009 and 2010.

2.7.3.2.6 Promoting Public Awareness of Gas Safety

The high level KPI's demonstrate considerable improvement over the period reported, in most areas. Of particular note are:

- 5.a Emergency Calls Received down 3.5% from 2009 to 2010.
- 5.b Carbon Monoxide Reports -

Overall annual total reports decreasing. Trends for 2008, 2009 and 2010 are typical for each quarter of each year (only one exception of Q3 2010, slight increase recorded). Notable increase in website hits. BGN maintaining advertising campaign to ensure continuing success.

6.c - No. of calls received via the "Dial-Before-You-Dig" telephone number is up from 5135 (2009) to 6544 (2010), this is increase is due to targeted Third Party Damage Prevention initiatives in 2010.

2.7.3.3 Review of 2008, 2009 and 2010 against Strategic Objective

In line with the overall **strategic objective** of the Framework, BGN intend to continue:

To ensure that adequate measures are taken to protect life and property from the dangers associated with natural gas by ensuring that gas related activities within the scope of Bord Gáis Networks' responsibilities are carried out in a safe manner.

Achieving the overall strategic objective of the Framework is the desired safety outcomes of no natural gas related incidents, injuries or fatalities.

Natural Gas reportable Incidents:	2008	2009	2010
Total Incidents:			
Fire	3	2	2
Explosion	2	1	1
Carbon Monoxide	1	0	0
Reportable 'Non-Reportable' 10	1	2	3
Injuries:			
Fire	0	0	1
Explosion	0	1	0
Carbon Monoxide	0	0	0
Fatalities:			
Fire	0	0	0
Explosion	0	0	0
Carbon Monoxide	1	0	0

2010 incidents include:

Quarter 1 i) Edenmore, Dublin. Operator error, appliance inspected no issue found

Quarter 2. ii) Pembroke Wood, Cork. Fire at a domestic boiler, electric fault.

iii) Mullingar, Meath. A damaged main (escape) no injuries (NR)

iv) Rochestown, Co. Cork: evacuation of 15 residents no injuries (NR)

Quarter 3. v) Finglas, Dublin – Gas cooker ring left on, then ignited, elderly lady

sustained minor injuries;

vi) Davitt Road, Dublin – vandalism of industrial commercial skid unit, no injuries (NR)

Quarter 4. CER provided with report on Kylemore Café, O'Connell Street, Dublin 1. Error in media report, incident not gas related.

Note: (NR) – Non reportable

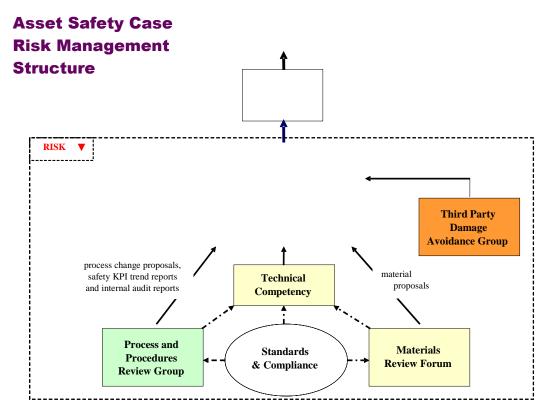
2.7.4 Adoption of Natural Gas Safety Regulatory Framework

Gaslink and BGN have adopted the Natural Gas Safety Regulatory Framework. The following structure is in place to manage the Distribution Safety Case requirements.

2.7.4.1 Risk Management Structure

BGN operate the Asset/Safety Case Risk Management Structure as illustrated below. The primary objective of this structure is to manage gas safety risks to a level that is deemed to be as low as reasonably practical (ALARP).

 10 These are incidents which did not impact upon people or property but were publicly reported.



2.7.4.1.1 Risk Review Committee

The Asset/Safety Case Risk Review Committee (A/SC.R.R.C.) consists of Networks cross functions management, and is responsible for the review of findings and proposals from subcommittees.

The primary objectives of Committee (A/SC.R.R.C.) is to report on the safety KPI's and propose Safety Case material and process changes. The Committee also reviews and manages the safety case risk register, identifies new and emerging risks, coordinates cross functional activities ensuring development and maintenance of effective efficient controls and makes recommendations on procedures and processes to reflect business practice and needs. Monthly reports are provided to Senior BGN Management and quarterly reports to Gaslink.

2.7.4.1.2 Risk Review Sub-Committees

The "Standards & Compliance" group will consist of Bord Gáis Networks representatives on ISO/CEN/Marcogaz/NSAI technical gas committees. The primary function of this group is to monitor developments of gas technical standards and legislation to ensure compliance of Bord Gáis Networks processes and procedures, and BGN materials selection and procurement with the relevant standards and legislative requirements.

All subcommittees are common to Transmission and Distribution except the "Materials Review Forum" which review materials, tooling and equipment relating to the specific transmission or distribution network.

2.7.5 Compliance with Codes of Practice

2.7.5.1 Codes of Practice

Every effort is made by BGN and Gaslink to provide services in a prompt, efficient and safe manner and to a high standard. This commitment is reflected in BGN's Customer Charter and four Codes of Practice.

The Customer Charter benchmarks the performance standards that BGN strives to achieve and provides assurance to customers of BGN's commitment to these standards. The four Codes of Practice outline the procedures and processes BGN adheres to in each of the relevant areas.

The BGN Customer Charter and Codes of Practice can be found on the BGN website¹¹ and are as follows:

- Customer Charter
- Customer Service Code of Practice
- Vulnerable Customers Code of Practice
- Complaints Handling Code of Practice
- Disconnection Code of Practice

In accordance with the Transmission & Distribution System Owner / Operator Licences, (Compliance Officer Condition), the Compliance Officer produces an annual report as to its compliance during the relevant year.

Compliance training was rolled out to all Networks Employees. Slide and training overview have been supplied to the CER, to substantiate licence condition.

General statement of compliance

Gaslink and BGN provide services in a prompt, efficient and safe manner and to a high standard, in accordance with the arrangements set out in the BGN Customer Charter and in line with the principles set out in the Codes of Practice, [subject to any exceptions noted in this Compliance Statement.]

General levels of performance compliance (performance relative to published Planned Performance Levels or Service Standards) for 2010 are as outlined in the statistics on pages 24 to 27 inclusive.

Non-compliances of a procedural nature relating to the conduct of activities covered by the charter & codes listed, are added as they arise, to the Regulatory & Compliance general register of non-compliances, maintained by Bord Gais Networks.

¹¹ See http://www.bordgais.ie/networks/index.jsp?1nID=102&pID=103&nID=641

2.7.5.2 Customer Service Code of Practice

BGN has implemented a vulnerable customer register and is fully compliant with all procedures as outlined in Vulnerable Customer Code of Practice.

As of the 31st of December 2010, there were 4,393 vulnerable customers registered on the BGN database.

	No of Customers 31 st December 2010	
Туре	Description	Total Customers
1	Visually Impaired	135
2	Mobility Impaired	286
3	Hearing Impaired	234
4	Elderly	3,738
	Total Types	4,393

The following customers are eligible to be designated as vulnerable

- Visually impaired
- Deaf
- Mobility Impaired
- Elderly (66 years or over)
 - Living alone
 - Living with another elderly person
 - · Living with a minor

Customers who phoned BGN during the poor weather towards the latter end of 2010 were in some cases left without the use of some or all appliances depending on the actual leak type. Because of the severe weather BGN issued heaters and/or breakfast cookers to these customers of which some could be deemed as vulnerable. However because the weather was so cold a lot of customers who would not be in the "vulnerable" category also had temporary appliances provided. BGN always maintain a stock of 500 appliances.

2.7.5.3 Complaints Handling Code of Practice

BGN has implemented a Complaints Handling Procedure. A report on the complaints received and compensation paid as a result of the introduction of this Code are outlined above.

2.7.5.4 Disconnection Code of Practice

The disconnection of gas supply at an End User's premises may be required under a range of circumstances. Because of the inconvenience caused to end users by disconnection a set of practices is set down and followed to ensure that the reason for disconnection is validated, appropriately communicated to the End User and carried out in the correct manner.

Table 2.7.5.5

Disconnection of gas supply	2009 Actual	2010 Actual
Total number of Lock Requests Dispatched	10,109	9214
Total number of Locks failed *	4669	4295
Total number of Successful Locks	5440	4912

^{*} A lock may fail for a number of reasons e.g. No access to meter - nobody at home, access denied etc.

2.7.6 Compliance with Licence Conditions

Both Gaslink and BGN have system operator and system owner licences respectively. Both organisations maintain a log in which reported breaches of compliance are noted, investigated and reported on. There were no material breaches of the Distribution Asset Owner Licence Conditions or the Distribution Operator Licences during 2010.

2.7.7 Other improvements/initiatives during 2010

2.7.7.1 Customer Service

2.7.7.1.1 Service Quality Improvements

Satisfaction Monitoring

W5, BGN's independent survey company, phone customers who have contacted the BGN call centre within one week of the customer's initial contact to ascertain the level of customer satisfaction with the service provided. Call Back monitoring for 2010 yielded overall satisfaction of 95% which is a 4 percentage point improvement compared to 2009's overall satisfaction score. This improvement is a result of ongoing monitoring and training of the call centre agents to ensure best practice.

Mystery Shopper surveys are carried out by W5 staff who phone the call centre posing as customers and ask a series of questions to evaluate the quality of service provided by the agents. Scenarios are continuously developed and tested to ensure that the core functions of BGN are undertaken in a confident and efficient manner. Mystery Shopper satisfaction achieved an overall performance of 95% in 2010, a 5 percentage point improvement on 2009 outturn (90%).

Both of these surveys are licence required programs, with each based on 1000 surveys carried out during 2010.

2.7.7.1.2 Service Information Improvements

Leaflets & Brochures

Throughout the year BGN continued to produce and distribute customer information material aimed at managing customer expectations and clarifying service delivery processes. 2010 publications included: a refresh of the meter location guide, a new 'Making the Connection' Brochure for domestic customers, a case study on natural gas in schools and colleges, a dedicated commercial brochure. Dedicated brochures were produced for each individual town approved for connection in 2010.

Meter Reading Self Service

The 'Dial a Read' Card which is left with customers where we cannot gain access to read their meter was improved in 2010 by making the steps to reading your meter clearer and the font larger for customers. The Dial a Read interactive phone service was slowed down to give customers more time to use this service with all steps re-recorded to make them easier for customers to follow. Further development of this service is planned for 2011.

Businesslink

A dedicated phone line was implemented to provide direct access for Commercial customers to the call centre. Commercial call volumes increased from 1% in May to 30% at year end.

2.7.7.1.3 Service Delivery Improvements

Bord Gáis Networks were awarded in four categories at the prestigious CCA Excellence Awards in the UK and the Irish CCMA Awards in 2010.

The CCA named BGN as 'Customer Service Complaints Team of the Year' and also awarded BGN the overall prize of 'Team of the Year'. The submission was based on innovations and efficiencies in the complaint handling process in the last two years and the dedication to customer care across the business.

At the Irish CCMA Awards, Bord Gáis Networks won the award for 'Best Quality Measurement Programme' for the second year running and the overall prize of 'Contact Centre of the Year'.

2.7.8 Siteworks Performance

The BGN Customer Charter incorporates explicit commitments in respect of a range of customer facing services. The prices included in this Siteworks Charging regime have been determined in the context of continuing to provide these customer facing services in line with those published commitments.

Gaslink and BGN recognise that Shippers and Suppliers should have service level commitments for those services which they procure from BGN whether for themselves or on behalf of their customers.

The agreed standards outlined below are in respect of data turnaround and attendance/access. The standards outlined reflect current BGN work practices, service provision models and technology and represent achievable stretch performance in the context of current BGN resources. The actual prices in respect of these services as outlined in the CER approved Siteworks Charging regime assume service commitments at these levels

BGN proposes these Shipper/Supplier facing commitments as an initial formalisation of performance expectation/delivery. It is expected that these would evolve/tighten over time as changes and developments within BGN permit.

Bord Gais Networks Site-works Services Standards – Performance 2010

Supplier Requested Work Returns

Meter Related Activity Domestic & Commercial	Standard	Performance
Confirmation Out-turn/Read from Activity * -Special Read Requests.	90% ← 5 w/days. 100% ← 10 w/days.	97% ← 5 w/days. 99% ← 10 w/days.
-All Other Requests. **	90% ← 10 w/days. 100% ← 20 w/days.	93% ← 10 w/days. 99% ← 20 w/days.
Appointment Grant for Requests		
-Special Read Requests	100%← 5 working days.	100% ← 5 working days.
-All Other Requests	100% ← 5 working days.	100% ← 5 working days.

Supplier Requested Work Access Standards

Meter Related Activity Domestic & Commercial	Standard	Performance
Debt Management Related Isolation/ Disconnection		
Attended As Appointment Access % Achieved	100% 60%	100% 55%
All Other Activities		
Attended As Appointment Access % Achieved.	100% 100%	100% 96%

^{*}Out-turn is the message sent back to the shipper (complete or no access.) Read is the meter read from the activity included in the message.

Debt management

^{**} Such as meter fits, locks, unlocks exchanges.

The poor rate of access on shipper requested credit locks in 2010 is due to meters being located inside customer's homes. When a BGN representative calls to lock the meter they maybe refused access. If the meter is outside, the BGN representative can attempt to lock the meter but must always tell the customer upfront as to why they are there. The Code of Disconnection states that BGN must inform the customer when they arrive on site as to what their intention is.

Other appointments

BGN have always been very successful with all other appointment types and the reason for the drop in this statistic for 2010 is due to a complete IT system change over. This is improving as the system is bedding in.

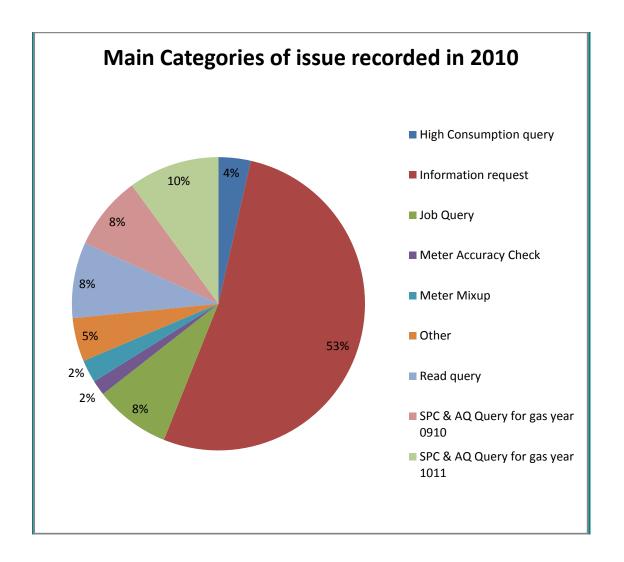
Section 3: Other Performance Criteria

3.1 Shipper Issues

3.1.1 Breakdown of Opened Shipper escalations by type

There were 962 issues escalated to Shipper Services Key Account Management in 2010.

The main categories of issue recorded were:



There are a wide variety of issues escalated to the Shipper Services Key Account Management function, in addition to the day to day operational issues, the rise in the number of information requests (870 information requests in 2009) is due to the interaction with the new market entrants that entered the NDM sector in 2010.

BGN and Gaslink are currently working with industry at the Gas Market Arrangements Retail Group (GMARG) and Code Mod Forum to agree process changes to reduce some of these issues. BGN and Gaslink are also working proactively with Shippers on initiatives such as identifying possible Supply Point Capacity issues in advance of issues occurring.

3.1.2 Average number of business days that a Shipper Issue was open (by issue type)

The average length of time that a Shipper issue was open was 10 business days.



3.1.3 Shipper Issues Management

All Shipper issues are systematically logged by the Shipper Services Key Account Management function on the enhanced Shipper Issues system. Every issue is assigned a unique issue number and Shippers receive an email confirmation of each issue and status within 3 business days. BGN provide each Shipper with an issue update every 20 business days thereafter as long as the issue remains open on its system.

3.1.4 Other BGN Service Standards – Performance 2010

Customer Commitments	Performance Target	Actual	
		Performance	
Shipper Operations			
DM Change of Shipper	100%	100%	
Entry Capacity Booking Requests	Process <= 20 days	100%	
Exit Capacity Booking Requests	Process <= 20 days	100%	
Trading and Settlements			
Invoice circulation	By 12 th day of month	100%	
Provision of shrinkage gas	Prior to October billing	100%	
quantity/cost estimates			
Meter Reading Services			
Access Rate	80%	86%	
MRS Read Rate	Average 3.2 Reads per site per year	3.54	
Forecasting, Allocation and	80% within accuracy of 1,250 kWh	88.32%	
Reconciliation (FAR) Domestic			
reconciliation			
FAR IC reconciliation	80% within accuracy of 4,500 kWh	71.92%	

	Key Performance Indicator Comments				
Description	Standard	Performance			
FAR IC reconciliation within accuracy of 4,500 kWh	80%	71.92%	The metric measures the % of reconciliation's, in kWh, which are under 4,500kWh for IC sites, against a target of 80%. A systematic statistical analysis of root causes was undertaken which showed that the key driver for the metric reduction was the adjustment of the read cycle for each site according to its AQ This adjustment was undertaken from August-October 2007. There are approximately 20,000 IC sites and the table below summarises the read frequency before and after the adjustment.		
			# GPRN Before Afte		
			Read monthly (typically 12 actual reads per year)	16,848	9,655
			Read bi monthly (typically 3 reads per year before August 07)	4,276	13,276
					oom 3 to 4 bi-monthly ever, the cion in the he low AQ naving low thly cycle. the metric, erences is
					sites. The ll suited to etric is not process measures
			Because the range for IC sites is so large this me not very reflective.		