



Transmission and Distribution System

Performance Report 2011

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Introduction

Gaslink was established under EU Gas Directive 2003/55/EC and in accordance with Statutory Instruments (SI's) No. 760/2005 and 377/2007. The unbundling requirements of this legislation place the Transmission and Distribution system operator functions with Gaslink which is legally separate from the remainder of Bord Gais Eireann (BGÉ).

In accordance with the SI's BGÉ and Gaslink entered into an Operating Agreement in 2008 that set out the terms on which each party would fulfil their respective functions regarding the BGÉ Transportation System.

Gaslink executes most of its functions through Bord Gáis Networks (BGN) as described in the Operating Agreement. The Agreement sets out the processes and support functions that are provided under contract by BGÉ (acting through its networks division BGN) to Gaslink.

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.

¹ The Gaslink Performance Criteria was approved by the Commission in August 2009 and can be found at the following link: <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)
2009	56,426	155	225
2010	62,316	171	258
2011	*54,762	150	230

*The decrease in total gas transported from 2010 to 2011 can be attributed primarily to mild weather conditions and reduced power generation gas demand. Daily metered demand and shrinkage were also down however the vast majority of the decrease was as a result of lower NDM and Power Generation demand.

1.1.2. Demand change

Table 1.1.2

	Demand Change (%)	Demand Change (Energy)
2009	-3.8%	-2,254 GWh
2010	+10.44%	+ 5,890 GWh
2011	-12.12%	- 7,554 GWh

Table 1.1.2 reflects the decreased demand for gas in 2011, down 12.12% 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. Delivered Target*	Actual Performance		
		2009	2010	2011
Moffat Delivery ±3%	99%	100%	100%	100%
Inch Delivery ±5%	99%	97%	96%	96%

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

Low hourly flows at Inch can lead to difficulties meeting this KPI. Low hourly flows are as a result of shipper / producer requirements.

(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 RoI system as a percentage of throughputs.

Table 1.1.3(b)

KPI	Target	2009	2010	2011
Shrinkage as a % of Throughput	N/A	1.42%	1.41%	1.31%*

* Unaccounted for Gas is detailed in section 1.1.4. The percentage for own use gas can be calculated as shrinkage % - UAG % as they are both measured using total system throughput.

(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 0.9% of all meters verified in 2011 required adjustment.

Table 1.1.3(c)

KPI	Target – No. of Adjustments	2009 – Actual No. of Adjustments	2010 - Actual No. of Adjustments	2011 - Actual No. of Adjustments
Metering Data Validation	<2% of sites	1.3%	1.3%	0.9%

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.

Table 1.1.4

UAG	Target	%*	Energy
2009	±1%	0.05936%	+33.5 GWh
2010	±1%	0.02779%	+17.6 GWh
2011	±1%	-0.15302%	-83.8 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.

1.1.5. Carbon Usage / Emissions

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

Table 1.1.5

Compression site	2009 (tonnes)	2010 (tonnes)	2011 (tonnes)
Midleton	3,073	4,932	8,528*
Beattock	44,917	47,318	41,002
Brighthouse	61,156	71,440	62,619

* This increase in Carbon Emissions is due to the compressors operating for more hours during the year following work that was carried out to increase the operating envelope of the compressor station to facilitate lower flows.

1.1.6. Usage of Inventory Product and Storage

The table below outlines the amount of gas kept in storage during 2011 (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

	2009 (GWh)	2010 (GWh)	2011 (GWh)
I/C Inventory Space Utilised	123	42	261
Inch Export to Storage	1069	1468	1576

1.1.7. Capacity bookings

Exit Capacity is the total amount of booked capacity by shippers on the transmission system. As of 31/12/11, 249.13 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 (kWh)	132,752,523*
Distribution LDM Sites (kWh)	3,657,637
Aggregate DM Sites (kWh)	4,632,966
Aggregate NDM Supply Points (kWh)	86,913,341

* The decrease on 2010 relates to LDM Transmission sites active capacity bookings.. The LDM Distribution bookings increase can broadly be explained by the new connections in 2011; the number of LDM Distribution connected sites rose from 9 to 13.

The Moffat and Inch Entry Capacity bookings on 31/12/2011 amounted to 317.16 GWh.

Table 1.1.7

Capacity bookings	31/12/2009	31/12/2010	31/12/2011
Inch	34.82 GWh	33.53 GWh	38.54 GWh
Moffat	299.61 GWh	309.04 GWh	278.62 GWh
Total	334.43GWh	342.57 GWh	317.16 GWh

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

Table 1.1.8

Category	31 st December 2010	31 st December 2011	% change
Transmission LDM	34	33	- 2.941%
Transmission DM	18	18	0%

1.1.9. Total Length of Pipeline and number of installations on the Transmission System up to December 2011

Total No of AGI's	170	Decommissioned	6
Total No Of Compressor Stations	3	Decommissioned	0
Total No of Block Valve	19*	Decommissioned	0
Total No of Valve Pits	22	Decommissioned	4
Total No of UGI's	5	Decommissioned	2
Total No of Installations	219	Decommissioned	12

* Denair, Rochestown, Gurteen, Portersize, Moanmore, Raheen, Finnerstown, Ories, Gribton, Blockvalve 4, BV1Vallyfield, Blockvalve3, Blockvalve2, Westerparkgate, Moneynierin, Srahyconiguan, Rockfiled, Knockroe, Beagh More.

Table 1.1.9(a)

Length of Onshore Pipeline (km)	2004	Decommissioned (km)	25*
Length of Offshore Pipeline (km)	411	Decommissioned	0
Total Length of Pipeline (km)	2415	Decommissioned	25

(* Inclusive of pipe recorded on the system decommissioned in or before 2011 – no change since 2010)

1.1.10 Performance Standards

(a) BGN Transmission Service Standards – Performance 2011

Table 1.1.10(a)

Customer Commitments	Performance Target	Actual Performance
<u>Maintenance Days⁴</u>		
Unscheduled Maintenance / Interruptions	Zero	0
Interruptions due to maintenance	5	0
<u>Safety & Quality</u>		
Reportable Safety Incidents	Zero	0
<u>Communications & Instrumentation</u>		
GTMS System Availability	99.8%	99.98% (equates to approx 6 hours 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	2009	2010	2011
System Balancing Actions	48 (12 per Qtr.)	20	37	39
Shipper Imbalance as % of total flow*	N/A	0.25%	0.24%	0.14%

* 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 2011 as well as requests to change shipper and provides Historical Consumption.

Table.1.2

Category	GasPoints* Registered @ 31 Dec 2011	Total Gas Points Registered during 2011	Total Gas Points De-registered during 2011	Tariff Exempt ⁵ NDM Supply Points @ 31 Dec 2011	Total Tariff Exempt NDM Supply Points during 2011	Change of Shippers Jan-Dec 2011	Historical Consumption Requests Jan –Dec 2011
LDM	46 SPRNs (80 Streams)	5	0**	N/A	N/A	7	8
DM	215 SPRNs (222 Streams)	5	0	N/A	N/A	52	107
NDM I/C	25,468	967	11	1,003	700	4,283	2,322
NDM Domestic	630,866	6,919	74	3,858	2,899	108,966	N/A
Total	656,595	7,896	85	4,861	3,599	113,308	2,437

* Transmission and Distribution

** BGN / Gaslink have not received an application to deregister a DM or LDM site in 2011

⁵ Tariff Exempt NDM Supply Point if the following validation criteria apply: (a) there is be no End user assigned to the NDM Supply Point for at least the past 1(one) month; (b) a Shipper-Requested Lock has been in place for at least two (2) months; (c) there are no requests by the Registered Shipper for Operational Site works Services at the NDM Supply Point. (d) there has been no consumption at the NDM Supply Point following the Service Lock.

1.3 Achievement of Capital Programme

Table 1.3.1

Reinforcement	Comment
AGI Capacity Upgrades ^(5 number)	Under Construction
AGI Capacity Upgrades ^(4 number)	Design Stage
Brinny AGI Upgrade	Design Stage
Cluden to Brighthouse Bay Pipeline	Design Stage

Table 1.3.2

Refurbishment	Comment
Operations Upgrades - Works identified or refurbishment or replacement of obsolete/unreliable system components identified by Operations staff. Multi location projects.	Commissioned
Operation Upgrades 2012 (6 number)	Design Stage
Kilshane Block Valve - Civil Works at entrance outstanding.	Under Construction
Dublin 4 Pipeline Replacement	Commissioned
Ballough Bypass - PC3 proposal submitted for completion of this project	Design Stage
Remote Cathodic Protection Measurement - National programme phase approach adopted	Under Construction
Cork Area Pipeline Marker Refurbishment	Under Construction
Dublin Area Valve Recovery	Completed
Waterford Replacement Pipeline	Design Stage
East Wall to Coolock Pipeline	Design Stage
Limerick Optimisation	Design Stage

Table 1.3.3

Third Party	Comment
M20 Motorway Diversions	Design Stage *

Table 1.3.4

Interconnectors	Comment
1. Beattock Volume Control	Commissioning in Dec 2012
2. Brighthouse Bay Bypass	Commissioned
3. Brighthouse Bay Upgrades	Commissioned

A number of enhancements have been undertaken at these sites to improve the efficiency of existing system.

Table 1.3.5

New Supply	Comment
Newtownfane to Haynestown (Mullagharlin)	Design Stage*
Raheen AGI, Supply to Tipperary Town	Commissioned
Burrencarragh AGI, Kells Upgrade	Commissioned

Compressed Natural Gas Facility,Cork	Design Stage
Tarbert Power Station	Preliminary Engineering *
Great Island Power Station	Design Stage
Kilkenny OCGT	Design Stage*

On hold - Initial works completed on these projects additional client funding and/or statutory approvals required to progress.

1.4 Gas Safety

1.4.1 High Level Safety Statistics

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 2011.

Key Performance Indicators

High Level Transmission Safety KPI's

The reference number (ref: 1 – 4) denotes KPI grouping under the Six Key Safety Regulatory Objectives.

Table 1.4.1

TRANSMISSION UNDERTAKINGS & KPI's:						
			2009	2010	2011	Notes:
T.1	Pressure Control	% of SCADA system availability	100%	100%	100%	
T.2	Gas Quality (cv , wobbe)	% Availability of the gas measurement equipment	100%	100%	100%	
T.3	Gas Emergency Exercises	Exercises Planned	2	3	2	
		Exercises Undertaken	2	4	4	

Table 1.4.2

	KPI	Compliance Monitor	Transmission KPI's:			Notes:
			2009	2010	2011	
1A	Public Reported Escapes	Total Reported Escapes	0	1	4	See below item "Minimising the Risk of Loss of Containment" For further details.
1B	Third Party Damage	Development enquiries requiring action	319	466	869	End to end "Dial Before You Dig" Internal Process updated. Greater capture of enquiries through targeted promotion of centralised number. Third Party Damage Prevention strategy group established in 2010. Training in classification of encroachments occurred in 2011.
	Third Party Damage Prevention Detected Encroachment Events [UKOPA Categorisations A, B, C].	Category A - Pipeline Damage or Leak	30	40	0	
		Category B- Serious Potential for Damage			20	
		Category C- Limited Potential for Damage			25	
		Total detected encroachment			45	
1C	Transmission Pipelines	Line breaks (major leakage)	0	0	0	
		Line damaged (sustainable level of leakage)	0	1	0	
		Line damaged (no leakage)	0	1	0	
2A	Pressure Control	Occasions where pressure drops below minimum design pressure	0	0	0	
		Occasions where pressure is greater than 1.1 x MOP	0	0	0	
2B	Gas Outages	No. of Unplanned Outages	0	0	0	
3A	Gas Quality (C.V., Wobbe)	Number of non compliant events (constituent parts outside criteria)	0	0	0	
4A	Gas Supply Emergencies	Local Gas Supply Emergencies 1,000 - 9,999 customers affected	0	0	0	

	KPI	Compliance Monitor	Transmission KPI's:			Notes:
			2009	2010	2011	
		NGEM Emergencies > 10,000 customers affected	0	0	0	
5A	Reportable Incidents*	Gas Related Incidents	0	0	0	

Third Party Damage: Significant increase in water mains rehabilitation work particularly by Dublin City Council in 2011. In the case of DCC daily work lists are issued to BGN and replied to. Change in type of work being performed in economy. Fewer big jobs, more small jobs. Increase in network length. Change in internal processes.

Prior to the Networks Transformation Programme third party enquiries were handled separately by Transmission and Distribution Business units. New procedures introduced in 2010 required distribution mapping department to also display transmission lines on all maps issued to third parties. Mapping produced by the distribution mapping department tends to cover urban areas and to be of larger scale (covering more area per map). These maps often include transmission pipelines even though the works may be proposed are not in direct proximity to them. The transmission third party liaison engineer receives a copy of all mapping issued by distribution and reviews them. Further liaison with the requestor will be then be performed if deemed necessary. These replies are counted in the KPIs as transmission development queries requiring action and have led to an increase in overall numbers.

* Reportable Incident, Article 17 of both the Gas (Amendment) Act 1987 (Section 2) Order 1987 (as amended) and the Gas (Amendment) Act 1987 (Section 2) (Distribution) Order 2003 (Article 17)

Analysis of 2011 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).

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 were four Public Reported Escapes in 2011 (Previously reported to the CER). One report from Middleton Compressor station investigated. No issue found. There were two reports from Little Island and one from Stillorgan Park AGI each resolved without interruption or incident.

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 had the following results:

Table 1.4.3

	2009	2010	2011
Development Enquiries	319	466	869
Detected Encroachments	30	40	45

This is a new method of collecting transmission encroachment data and began in 2011 and was accepted by CER at that time. We did not collect this type of data previously. It provides direct information on the type of work activities being carried out close to our transmission pipelines under Categories B and C. Category A is the most severe and would include actual damage to a transmission pipeline wrap or sleeve. The data will provide useful input into our Third Party Damage Prevention Programme.

Categories B and C relate to a reduced level of potential damage and are differentiated by the actual activity being carried out in the vicinity of the pipeline. Category B having the greater potential and Category C no serious impact. There were no Category A encroachments in 2011. Below is a table outlining the different types of Transmission encroachments based on the United Kingdom Onshore Pipeline-operators Association (UKOPA) model.

Category B – Serious Potential for Damage

Number of Encroachments By Third Party	Third Party Type	Number of Encroachments By Activity	Activity Type
1	Circus	1	Circus Tent
6	Contractor	2	Deepening Ditches
4	Landowner	1	Drainage
7	Local Authority	1	Earth Moving
2	Utility	10	Excavation for Repairs
		1	Fencing
		2	Pipelaying
		2	Pole Installation

Category C – Limited Potential for Damage

Number of Encroachments By Third Party	Third Party Type	Number of Encroachments By Activity	Activity Type
1	Contractor	5	Cleaning Ditches
2	Gov Agency	3	Deepening Ditches
17	Landowner	7	Drainage
5	Unknown	1	Excavation for Service
		1	Fencing
		2	Forestry

		1	Road Development
		5	Unknown

1. c. - Transmission Pipelines - Line breaks remained at zero in 2009, 2010 and again in 2011.

Maintaining Safe System Operating Pressure

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

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. 100% of the 36 planned odour tests in 2011 were undertaken.

Providing an Efficient and Coordinated Response to Gas Emergencies

No gas supply emergencies to report.

Minimising the Safety Risks Associated with the Utilisation of Gas

No incidents to report.

Review of 2009, 2010 and 2011 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.

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

There was no Natural Gas Reportable Incident in 2011.

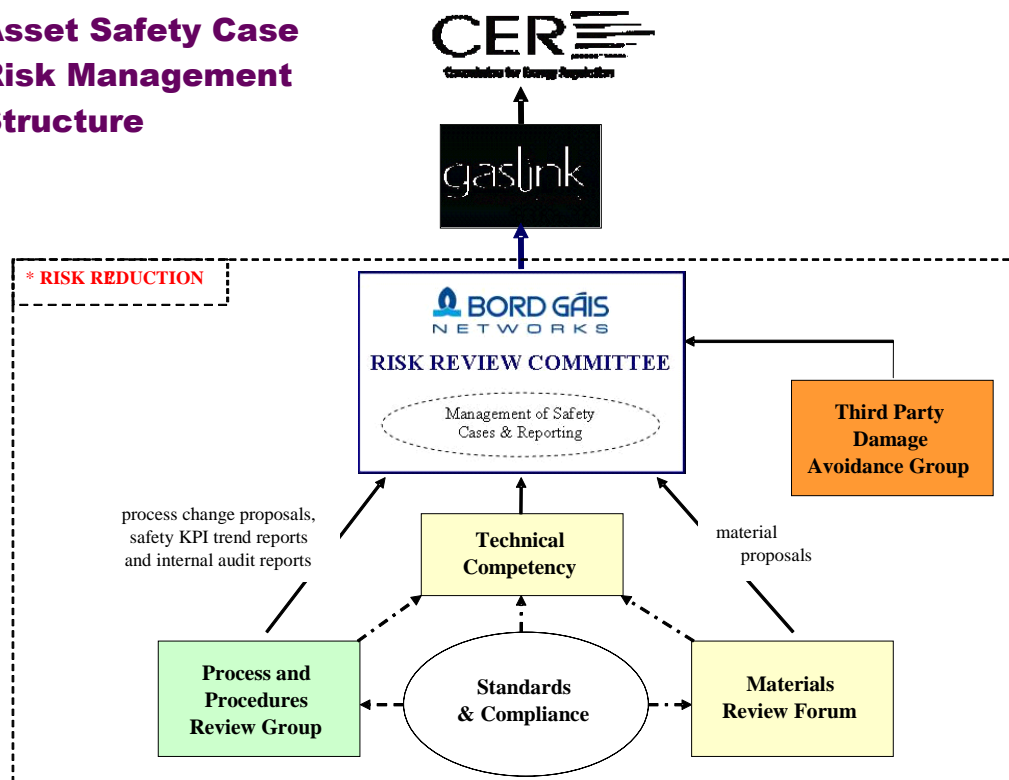
Adoption of Natural Gas Safety Regulatory Framework

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).

Figure 1.4.4

Asset Safety Case Risk Management Structure



Asset/ Safety Case Risk Review Committee

The Asset/Safety Case Risk Review Committee consists of BGN management across a number of functions and is responsible for the review of findings and proposals from sub-committees.

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.

Risk Review Sub-Committees

The "Standards & Compliance" group will consist of BGN 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.

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 2011 submissions were made to the CER with respect to the Networks Service and Works Contract (NSWC). A revised safety case, taking account of changes related to the Networks Transformation Programme was also submitted to the CER.

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.

Compliance with Transmission System Standards

Transmission System Standards

Safety is inherent in all design standards. Every effort is made by BGN and Gaslink to design the Transmission system in a safe manner and to a high standard.

This commitment is reflected in Gaslink's "Transmission System Standards" document (as approved by CER). The Transmission System Standards covers without limitation, the engineering of pipelines and associated equipment and the technical standards to be adopted for the design, construction, operation and maintenance, including standards relating to the physical durability of the transmission system (including its ability to withstand internal and external pressures, shocks and damage, whether natural or man made) and standards relating to the odourisation of natural gas.

General statement of compliance

Gaslink are compliant with the standards set out in the Transmission System Standards document, [subject to any exceptions noted in this Compliance Statement.]

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 2011.

Other improvements/initiatives during the year

Code Modifications

The following Code Modification Proposals were addressed during 2011:

Table 1.4.5

Total Number of New Proposals in 2011	Total Number of Outstanding Proposals in 2011 (from 2010)	Total Number of Proposals Approved	Total Number of Proposals Approved & Implemented	Total Number of Proposals Rejected
6	1	6	5	1

The following Code Modifications were approved and implemented during 2011:

A043 'Virtual Moffat Reverse Flow' (proposed in 2010)
A044 'Soft Landing for new LDM Distribution System Connected Sites'
A045 'LDM Termination of Capacity Bookings'
A048 'Data Protection'
'Disbursements Account Balancing Adjustment'

The following Code Modification was approved and to be implemented in 2012:

'Gas Quality'

The following Code Modification was rejected during 2011:

A047 'Interconnector Inventory Product Modification'

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.

Table 2.1.1

Bord Gais Networks Customer Charter Service Standards - Performance 2011						
Section	Customer Commitments	Total Occurrence	% Achieved	PPL Standard	No of claims	Compensation Paid***
2.1.2.1	Call Handling					
	Calls answered <20 secs	324,402	90.7%	80%		
	Calls Abandoned	35,540	1.8%	7%		
	Mystery Shopper Calls	999	94.0%	NA		
	Call follow-up surveys	1,027	92.0%	NA		
2.1.2.2	Quotation issuing					
	Quotations issued <7 w/day	4,779	99.8%	100%		
2.1.2.3	Complaint resolution					
	10 w/day	2,556	98.6%	85%		
	30 w/day	373	98.1%	85%		
2.1.2.4	Payment guarantee					
	Compensation/refunds paid	67	100.0%	100%		
2.1.3.1	Appointment granting					
	5 w/day	81,101	100.0%	100%	1	€35
	20 w/day	5,205	99.9%	100%		
2.1.3.2	Appointments kept					
	5 w/day	80,622	97.5%	100%	50	€2,800
	20 w/day	3,676	99.2%	100%		
2.1.3.3/4	Reinstatement					
	Temporary <1 w/day	11,028	97.5%	100%		
	Permanent <20 w/day	15,595	92.8%	100%		
2.1.4.2	Supply restoration					
	Gas on <24.00 next day	12,935	98.1%	100%	16	€3,185
2.1.4.1	Emergency Response					
	Attend site <1hr	19,569	99.9%	97%		

*** This column relates to additional payments made if the original payment was not made within 10 working days.

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.

2.1.2 Administrative Standards

2.1.2.1 Call Handling

There were a total of 372k calls offered in 2011. 325k of these calls were answered, and 90.7% of calls answered were done so within 20 seconds representing 294k calls. This was well within the standard of 80% minimum answering within 20 seconds.

The measurement of calls answered within 20 seconds was revised throughout the year bringing BGN in line with the industry standard. In previous years our calls answered within 20 seconds standard was calculated as a percentage of all calls offered⁶, the measurement for 2011 is based on calls answered within 20 seconds as a percentage of all calls answered. The revised result for 2010 was 91.9%.

A total of 47,417 calls were abandoned which was 12.8% of calls offered. Only 6,692 representing 1.8% were abandoned after the welcome message or after 10 seconds. This performance was well within the standard of 7% abandoned. The welcome message is provided in the first 20 seconds so the timing of the call answered starts when the customer connects to BGN and not after they listen to the message and pick an option. Of the 325,000 calls that were answered in total, 90% were answered within 20 seconds.

2.1.2.2 Quotation Issuing

2011 quotation performance remained highly compliant at 99.8% issued within 7 work days. The average turnaround was 1 day for domestic quotes and 2 days for I/C quotes. Overall only 8 of 4,779 quotations were issued outside the standard, compared to 7 of 4,608 in 2010.

2.1.2.3 Complaint Resolution

Complaints registered in 2011 were up 41% on the volume registered in 2010 with a total of 2,891 created, which is back in line with 2009 levels. Resolution compliance still remained high at 98.5% compared to the PPL @ 85% minimum. 2,929 complaints were closed-out during 2011, with 43 complaints resolved beyond the target date.

The increase can be mainly attributed to the planned meter replacement programme which was ongoing during 2011.

⁶ Calls offered are calls answered and calls abandoned combined.

The nature and relative frequency of complaint types is registered below: ***

Table 2.1.2

Complaint Type	No. Of	
	Complaints	% of Overall
Meter Related	978	33%
Appointment/service	471	16%
Site Management	274	9%
Damage to Property	239	8%
Reinstatement	206	7%
Technical	159	5%
Gas Supply	152	5%
Service Quality	129	4%
Charging	118	4%
Connections	109	4%
Gaswork	52	2%
Misc (System)	27	1%
Notice of Works	15	1%
Grand Total	2929	100%

Site Management – Inconvenience to the customer caused by a site currently being in or left in poor condition such as blocked access.

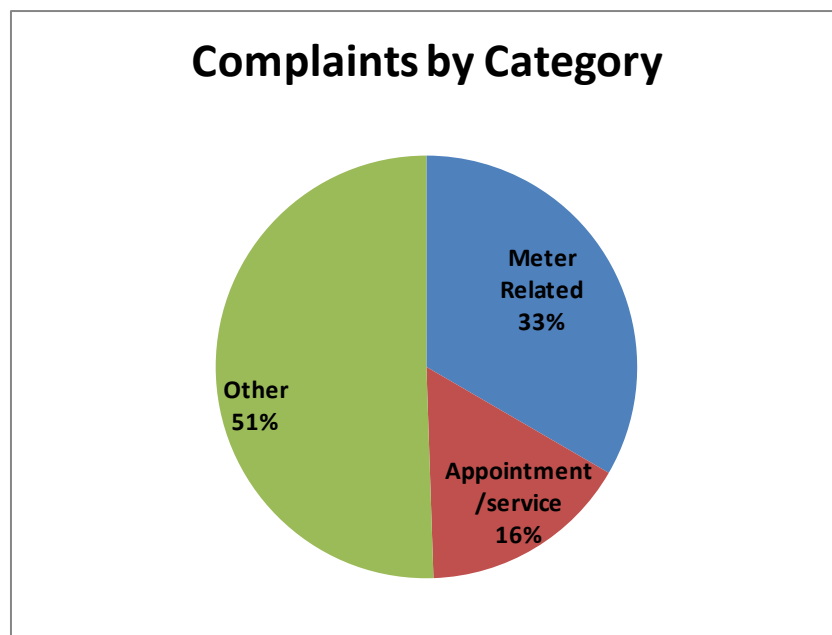
Gas Supply - Disruption to customer’s gas supply in the form of bad pressure or a delay in restoration.

Gaswork –customer dissatisfied with quality and finish of pipework after BGN works

Misc (system) – Lack of information due to the system not being updated in a timely fashion.

Safety/Technical – dissatisfied with a technical matter or an issue related to safety following BGN works or response

Table 2.1.3



2.1.2.4 Payment Guarantee

This section relates to additional payments made if the original payment was not within 10 working days. Charter compensations for 2011 totalled 67 approved/paid (of 64 claimed, 2 rejected, 5 carried from 2010) for an aggregate payout of €6,020. Of the 67 compensation

payments made 50 related to broken appointments, 16 to supply restoration delays and 1 to appointment granting. As all payments were made inside the 10 day criteria, there were no compensation payments made in relation to this standard.

Table 2.1.4

Compensation claims		
	2011	2010
Paid	67	61
Rejected	2	1
> 10 working days	0	5

Payment category		
	2011	2010
Supply Restoration	16	28
Broken Appointment	50	28
Appointment Granting	1	
Payment guarantee	0	5
Total	67	61

2.1.3 Service Delivery Standards

2.1.3.1 Appointment Granting

Appointment requests in 2011 were again substantially higher than 2010 (meter appointment requests totalled 81,101 up 120% and service appointment requests totalled 5,205 up 43%). Compliance with service standards was 99.9% for 2011. Throughout the year, 6 service appointments were granted outside the 4 wk/week standard, there were no meter appointments granted outside criteria in 2011. The increase in appointments requested was mainly due to the planned meter replacement programme and prepayment meter programme. The planned meter replacement programme, whereby older gas domestic meters were replaced with newer, more advanced models was made appointable in June 2011. Approx. 15k meters were replaced by appointment from June until the end of 2011. Approx. As part of a CER/Bord Gais initiative to assist debt recovery, approx. 23k shipper requests were made to replaced credit domestic meters with prepayment meters in 2011.

2.1.3.2 Appointments Kept

2011 performance achieved 97.5% compared to 97% in 2010. In 2011 2050, of more than 80,000 metering appointments, and only 28 of over 3,676 service lay appointments, were not delivered as booked. Even with the increase in appointments requested during 2011 by 118% compared to 2010, BGN managed to achieve a higher percentage compliance by half a percentage point.

The number of broken appointments increased from 28 in 2010 to 50 in 2011 as a result of the introduction of new technology in the form of Hand Held Devices being used by all field staff. There were a few initial problems with this technology and errors occurred with the device in the early stages. In some instances due to connectivity problems in certain areas fitters could not always update work orders real time, causing the appointment to record as broken. In certain instances a fitter may become available earlier than anticipated and may attend the appointment early with agreement from the customer, which would fall outside the appointment times on the system.

2.1.3.3 Temporary Reinstatement⁷

Performance in 2011 was highly compliant with 97.5% of over 11,028 temporary reinstatements conducted within the 24hr standard. Temporary Reinstatement may be completed outside criteria due to weather conditions such as heavy rain which may cause the cutting to be flooded or the contractor may have access problems (gates, cars in the way).

2.1.3.4 Permanent Reinstatement

92.8% of almost 15,595 permanent reinstatement activities during 2011 were performed within the 20 wk/day PPL.* Delays in permanent reinstatement can occur for a number of reasons. There may be a delay in obtaining a licence for the work or some permanent reinstatement jobs could be grouped in order to maximise the use of certain materials (e.g. asphalt).

*Reinstatement records were counted per job on the old system, since the introduction of the new system in Nov 2010 reinstatement records are counted in units eg. Road, grass, cobble (which may be completed at different times) hence the increase in YTD nos from 5k to 15k.

2.1.4 Gas Supply Standards

2.1.4.1 Emergency Response

Bord Gais Networks has a statutory responsibility to respond to smells of gas reported by members of the public, across the network. These public reported escapes (PREs) occur approximately 20,000 times per annum and have a one hour response criteria. Only 28 of 19,569 responses in 2011 were outside the 1 hr maximum standard for 99.9% compliant performance. The average response time across all responses was 27 minutes. 4,693 of these escapes were internal, 3,091 external and 11,785 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 12,935 no gas incidents (i.e. unplanned interruptions), only 241 were restored outside the 24 hour criteria, making the YTD performance 98.1% overall for 2011. 65% of No Gas incidents related to prepaid meters. The percentage of no gases on PPMs has always been historically higher than credit meters because of the additional activity that takes place in and around the meter. Now as the population of these meter types grows the increase in no gases is to be expected. The high percentage of no gases arising on PPM meters are as a result of a number of different reasons including tamper faults, card errors, downstream problems on single appliance situations i.e. boiler resets, boiler issues, battery issues, letting credit run out causing the boiler to lock out and meter faults.

⁷Once 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) 3. Permanent reinstatement (within 20 working days). Once the excavation is back filled, it is temporarily reinstated with tarmac 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

Table 2.2.1

Dx⁸ DM I/C		2010	2011	% Change
Annual Total	MWh	2,944,691	2,997,560	1.76%
Annual Daily Average	MWh	8,068	8,212	1.76%
Peak Day Flow	MWh	12,327	12,149	-1.47%
Dx NDM I/C				
Annual Total	MWh	4,138,249	3,716,728	-11.34%
Annual Daily Average	MWh	11,338	10,183	-11.34%
Peak Day Flow	MWh			
Dx NDM RES				
Annual Total	MWh	9,152,674	7,341,417	-24.67%
Annual Daily Average	MWh	25,076	20,113	-24.67%
Peak Day Flow	MWh			
Dx NDM Total				
Annual Total	MWh	13,290,922	11,058,146	-20.19%
Annual Daily Average	MWh	36,413	30,296	-20.19%
Peak Day Flow	MWh	95,216	74,481	-27.84%
Dx Total				
Annual Total	MWh	16,235,613	14,055,705	-15.51%
Annual Daily Average	MWh	44,481	38,509	-15.51%*
Peak Day Flow	MWh	107,180	85,525	-25.32%

* The contraction in gas demand from the weather sensitive distribution connected customers can be primarily attributed to the milder weather conditions experienced in 2011.

2.2.2 Shrinkage

Shrinkage as a % of total distribution throughput in 2011 = 1.0% (compared to 1.0% in 2010)

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

Table 2.2.2

Connections	2010	2011	% Change
Dx DM I/C - Connects	233	245	4.90%
Dx NDM I/C - Connects	23,293	23,694	1.69%
Dx NDM RES - Connects	618,088	622,563	0.72%
Dx Total - Connects	641,614	646,502	0.76%

⁸ Distribution Network

2.3 Total length of pipe in distribution system

Distribution Network Lengths - Systems Lengths at end 2011* (Material)

Table 2.3.1

	PE 2011	PE 2010	Other 2011*	Other 2010 *	Totals 2011	Totals 2010
Eastern Region (incl. Carlow & Kilkenny)						
Total Length (km)	7700	7657	91	60	7791	7717
Cork						
Total Length (km)	1586	1525	8	7.1	1594	1532
Limerick & S.E.						
Total Length (km)	1252	1238	8	8	1260	1246
Galway & West						
Total Length (km)	384	372	1	1	385	373

Key
PE =

Polyethylene

*Other materials are Steel, Ductile Iron, Wrought Iron, Cast Iron and Gun Barrel.

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.

Post "Cast Iron Replacement Project" as laid data verification and G.I.S. records update on-going. A desktop study was completed in 2011 to determine the scope for the residual siteworks which are scheduled to commence in 2012.

2.5 New connections during year (by category)

Table 2.5.1

Meters	2010	2011
One off residential	3467	5983
New Housing	2941	1097*
Industrial / Commercial	738	926

* New housing connection records do not currently differentiate between houses and apartments.

Table 2.5.2

Capital Programme	Total 2010 Actual	Total 2011 Actual	Total 2011 Allowance	% Achieved
Total Services (nos)	4572	5613	24194	23%
Total New Mains kms	77	19	271	7%
Total Mains Renewed	0	6	0	0%

23% 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.

Table 2.5.5 shows that BGN laid 93% less main than was provided in the 2011 allowance. 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

The following is a brief update on each Phase.

2.6.1 New Towns Phase I

Eligible towns from New Towns Phase I with a proven anchor load have been completed with the exception of Tuam. The connection to Tuam awaits confirmation of connection to the proposed anchor load.

2.6.2 New Towns Phase II

Eligible towns from New Towns Phase II with a proven anchor load have been completed.

2.6.3 New Towns Phase III

- Construction completed in 2011 on Kinsale, Kells, Tipperary Town.
- Macroom: Anchor load connected in 2011 – extension to town to be constructed in 2012
- Cootehill: Construction to commence in 2012.

2.6.4 2011 Reinforcement Performance Review

All of the planned Reinforcement projects were completed on programme and within budget for 2011. The majority of these projects were located in the South Dublin area due to the significant high density development that took place in the late 00's which resulted in capacity congestion on the local network. There were 37 projects in total.

1. Fermoy LP reinforcement
2. Stillorgan Park to Trees Rd Reinf.
3. Dalkey 4bar Reinf
4. Loughlinstown DRI
5. Kilmacud DRI
6. Castle Park Road LP
7. Dalkey LP
8. Church Place DRI
9. Foxrock Park Reinf
10. Marlborough Road Reinf
11. Foxrock Mount
12. Clonshaugh to Stockhole Reinf.
13. Herbert Park LP
14. Palmers Avenue LP
15. Elm Mount Park DRI
16. Belcamp DRI
17. Brookstone Road LP
18. Clonliffe Road DRI
19. Scholarstown Reinf
20. Lough Conn Road LP
21. Landen Road LP
22. Swords Road DRI
23. The Thatch Road
24. The Thatch Road Link
25. Castlecourt Shopping Centre
26. Brighton Square LP
27. Clarinda Park DRI
28. Landsdowne Road DRI
29. St. John of God's Link*
30. Trim Rationalisation link*
31. Dunboyne DRI upgrade*
32. Ashtown Phase 2*
33. Wellington Quay*
34. Hollybrook Outlet Upgrade*
35. Carrick On Suir Rationalisation
36. Johnstown Waterford
37. Loughshinny Outlet

* Reinforcement projects currently under construction.

- A total of 17km of reinforcement mains were laid in 2011.
- The Horizontal Directional Drill in Waterford consisted of 600m drill under the River Suir (the largest drilling operation ever undertaken on the distribution network).

- Clonsaugh to Stockhole reinforcement project was the largest project undertaken during 2011 and consisted of 4.2km of 250mm of Polyethylene Pipe.
- Limerick reinforcement consisting of 2.4km of 315mm PE completed linking Ballinacurra Bridge to the Dock Road.
- The 2011 Limerick 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 2011. Safety performance is a key priority for both Gaslink and BGN.

2.7.2 New Initiatives

The Third Party Damage Avoidance Strategy Group was set up to target initiatives in minimising third party damage to the gas network (see 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 and 2011.

Network mapping data exchange agreements with utilities, contractors and local authorities were extended to provide Geographical Information Systems (GIS) to a total of seven new parties in 2011.

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

During 2011, BGN issued a letter and 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

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.

Table 2.7.1

DISTRIBUTION UNDERTAKINGS			2009	2010	2011	Notes:
d.1	Replacement Mains					
d.1.1		Remaining Cast Iron mains to be replaced in the "Cast Iron Replacement Project"	1 km			"Residual metallic mains replaced as discovered."

d.1.2		Cast Iron mains that were replaced as part of the "Cast Iron Replacement Project"	230 km	1 km		"Residual metallic mains replaced as discovered."
d.2	Gas Emergency Exercises	Exercises Planned	3	2	2	
		Exercises Undertaken	3	1	2	

Ref	Subject	High Level KPI	Distribution:			Notes:
			2009	2010	2011	
1A	Public Reported Escapes	No. of External Leaks Detected	3350	3668	3091	
		No. of Internal Leaks Detected	4464	3906	4693	
1B	Third Party Damage	No. of Main Damages	113	62	89	
		No. of Service Damages	572	461	482	
1C	Gas in Buildings	Number of 'Gas in Buildings' events (i.e. all gas ingress from external infrastructure)	4	0	2	Both Gas in building events due to third party damage. Broomhill Tallaght and Phibsborough Road.
1D	Evacuations	No. of BGN initiated evacuations	3	3	2	Both Gas in building events due to third party damage. Broomhill Tallaght and Phibsborough road.
2A	Gas Outages	Number of unplanned outages in the following categories:				22 houses, Ballypark, Drogheda
		> 15 Customer affected	9	5	1	
		> 100 Customer affected	0	0	0	
		> 250 Customer affected	0	0	0	
3A	Gas Supply Emergencies	Local Gas Supply Emergencies 1,000 – 9,999 customers affected	0	0	0	Regulatory requirement of 97% met.
		NGEM Emergencies - >10,000 customers affected	0	0	0	
3B	Public Reported Escapes	% attended within one hour	99.9	99.01	99.86	
4A	DSO Incidents	Reportable under Gas Legislation	3	3	0	

	DSO Incidents	Reportable under CER Guidelines			3	<p>1. 5th February 2011 Blackpool Shopping Centre, Cork. Articulated lorry reversed into meter skid fencing which then hit and broke off inlet pressure gauge on the service riser.</p> <p>2. 2nd December 2011 Third Party damage to a gas main in Broomhill Tallaght commercial premise evacuated.</p> <p>3. 30th December 2011 Ranelagh Luas line temporarily closed, relief valve replaced due to debris in valve.</p>
	Customer installations.	Number of Gas related incidents attended by BGN and Non Gas Related) Fire Explosion Carbon Monoxide			1	1. 6 th June 2011 Customer Installation, Pearse House, Dublin 2.
	Non Gas related incidents	Number of Non Gas related incidents attended by BGN			2	<p>1. 13th September 2011 Electrical cable incident Leinster Road, Dublin 6.</p> <p>2. 7th November 2011 Pearse house incident confirmed non gas related.</p>
5A	Emergency Reports	No. of emergency calls received via the 24-hour emergency telephone number (1800 20 50 50)	20,333	19,663	19569	
5B	Carbon Monoxide Helpline	No. of CO-related calls received via the 'Carbon Monoxide Helpline (1800 89 89)89	2427	1847	2298	
5C	Third Party Damage	Total enquiries to 1800 427 747 (inward communication)			1511	
		Total enquiries to distributionDBYD@bge.ie /post/fax/calls (inward communication)			4876	
		Total inward enquiries	Total 5135	Total 6544	Total 6,387	

Summary of 2011 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).

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:

a. - Public Reported Escapes

The number of internal escapes in 2011 was 4693 up 787 from 2010 (3906) and up 229 from 2009 (4464).

The number of external escapes in 2011 was 3091 down 577 from 2010 (3668) and down 259 on 2009 (3350).

b. - Third Party Damage – No. of Damages in 2011 was 571 events (down 114 from 2009 and up 48 from 2010);

c. – Gas in Buildings – No. of Events in 2011 was 2 (down 2 from 2009 and up two from 2010). Both events were caused by third party damage.

Maintaining Safe System Operating Pressure

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

a. - Gas Outages – No. of unplanned outages down to 1 event, down by 4 number events on 2010 figures. In Ballypark Drogheda, the Council resurfaced a road and replaced a gas valve cover with a water valve cover in error. The water conservation crew were working at the location and turned off the gas valve as it was incorrectly marked. This resulted in 22 houses being without a gas supply. Awareness campaigns are on-going to maintain this standard.

Minimising the Risk of Injecting Gas of Non-Conforming Quality

There were three non compliant events reported:

A. Cahir purging of main to stimulate flow.

B. Kinsale system flow to be reconfigured to stimulate gas flow through Distribution Regulating Installation on new town connection.

C. The general consensus regarding the Kilkenny sample is that it was not a true reflection of odorant levels within natural gas in the area. A second sample taken at the same point which passed; and samples taken on the other side of the town passed also.

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:

- a. - Gas Supply Emergencies – No. of gas supply emergencies (Zero for 2009, 2010 and 2011);
- b. - Public Reported Escapes - % attended within one hour (2009, 2010 and 2011 statistics retained above 99%)

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:

a. - Reportable Incidents,

DSO Reportable Incidents under Legislations:

Zero incidents reported under legislation.

DSO Reportable Incidents under Guidelines:

- Ranelagh Luas line temporarily closed, relief valve replaced due to debris in valve.
- Third Party damage to a gas main in Broomhill Tallaght.
- Third Party Damage Blackpool Shopping Centre, Cork. Articulated lorry reversed into skid fencing which then hit and broke inlet pressure gauge.

Customer Installations:

- Incident at Pearse house, one person injured.

Non Gas related incidents:

- Electrical cable incident Leinster Road, Dublin 6. Non Gas related.
- 7th November 2011 Pearse house incident confirmed non gas related.

b. – There were no natural gas related Carbon Monoxide incidents in 2009, 2010, and 2011.

Promoting Public Awareness of Gas Safety

The high level KPI's improved over the period of particular note were:

- a. Emergency Calls Received – Advertising campaign consistent coverage in 2010 and 2011.
- b. Carbon Monoxide Reports –
Overall annual total reports decreasing. In 2011 there was an increase in Q1 and Q4 due to other Carbon Monoxide incidents non Natural Gas related. This gave a notable increase in website hits. BGN are maintaining advertising campaign to ensure continuing awareness.

c No. of incoming enquiries received for “Dial-Before-You-Dig” is down from 6544 (2010) to 6387 (2011), this is due to the increase in third parties receiving direct access BGN G.I.S mapping under data exchange agreements.

Review of, 2009, 2010 and 2011 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.

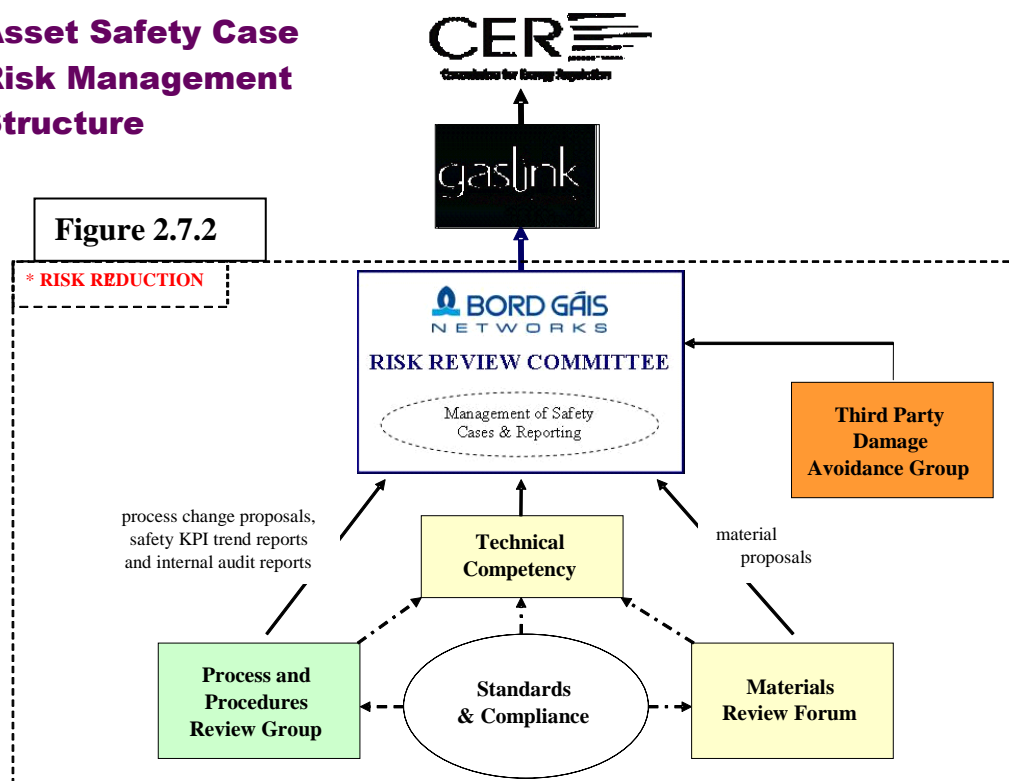
2.7.4 Adoption of Natural Gas Safety Regulatory Framework

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

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).

Asset Safety Case Risk Management Structure



Risk Review Committee

The Asset/Safety Case Risk Review Committee (A/SC.R.R.C.) consists of BGN management from a number of functions and is responsible for the review of findings and proposals from sub-committees.

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.

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

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 website⁹ 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. Slides 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.

General levels of performance compliance (performance relative to published Planned Performance Levels or Service Standards) for 2011 are as outlined in the statistics on pages 22 to 26 of this document.

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.

⁹ <http://www.bordgaisnetworks.ie/en-IE/About-Us/Our-business/Our-Values/Customer-charter--codes-of-conduct/>

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 2011, there were 5,922 vulnerable customers registered on the BGN database.

Table 2.7.3

	No of Customers 31st December 2011	
Type	Description	Total Customers
1	Visually Impaired	140
2	Mobility Impaired	414
3	Hearing Impaired	254
4	Elderly	5,114
	Total Types	5,922

The following customers are eligible to be designated as vulnerable

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

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 in section 2.1.2.3.

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 2.7.4

Disconnection of gas supply	2009 Actual	2010 Actual	2011 Actual
Total number of Lock Requests Dispatched	10,109	9214	9,538
Total number of Locks failed *	4669	4295	5323
Total number of Successful Locks	5440	4912	4215

* A lock may fail for a number of reasons e.g. No access to meter - nobody at home, access denied etc. in 2010, 7 Lock Requests were dispatched but cancelled late by the supplier and therefore were unsuccessful.

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 2011.

2.7.7 Other improvements/initiatives during 2011

Customer Service

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 2011 yielded overall satisfaction of 92% out of 1027 callbacks.

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. Mystery Shopper satisfaction achieved an overall performance of 94% in 2011 out of 999 surveys.

W5 also carry out surveys to determine satisfaction levels in relation to complainants (66%), field operations (83%), Public Reported Escapes response (97%), Meter Replacement (87%) and Connection Reps (86%).

Service Information Improvements

The Customer Care team within BGN continue to put in place initiatives to improve the overall Customer experience.

Customer Information

Throughout the year BGN continued to produce and distribute customer information material aimed at managing customer expectations and clarifying service delivery processes. 2011 saw BGN increase use of alternative channels for communicating to customers. The BGN website is now used to inform customers up front of gas outages, large programmes of work being undertaken, and to request leaflets on line. BGN increased the use of outbound text messages to customers in 2011 by including text messages for the Meter Replacement Programme and for Carbon Monoxide Alarm Training for Registered Gas Installers.

Dial a Read and Web a Read

Dial a Read (DAR) launched in September 2009. This is a self service solution for facilitating the input, by customers, of their meter readings to an automated system. There are many benefits, some of which include increased accuracy of the estimation process and a reduction in telephone calls directly to the Contact Centre. There were a number of improvements made to the dial a read card left with customers by their meter reader during 2011. During 2011 there was an 11% increase in the number of customers using the DAR service over 2010 and an 8% increase in customers successfully inputting their meter reading using the automated solution.

In October 2011 we successfully launched Web-A-Read which is an online version of the DAR functionality. To embrace new smart phone technology at the end of 2011 we included a Quick Response (QR) code on the no access card left by the meter reader. It is a faster way for people to access the "Submit A Meter Reading" section of our website. To date 83% of customers opting to use Web-A-Read have successfully entered their meter reading using this self service option.

Businesslink

The number of calls from commercial customers increased by 23% in 2011 to 26,225 calls. The dedicated line, Businesslink, answered 36% of the calls. The service was set up in 2010 to provide a direct line for business customers without Interactive Voice Response (IVR).

Customer Service Awards

In the 'UK CCA Excellence Awards' (Customer Contact Association, which covers Ireland, UK & International companies, Bord Gáis Networks were shortlisted in the Most Effective Use of Self Service category in respect of enhancements to our Dial-a-Read service.

In the European Call Centre & Customer Service Awards 2011, Bord Gáis Networks have been short listed in the most sought-after category of Best Customer Service Operation based on a submission that highlighted our values driven/voice of customer focussed service development approach.

In the Irish Contact Centre Management Awards (CCMA) Awards 2011 Bord Gáis Networks were highly commended for our Best Customer Service Delivery submission.

BGN Customer Care Manager was selected by CCA to join the judging panel for this year's excellence awards. The categories judged were Great Places to Work, Team of the Year, B2B and Agent of the Year. This is a very worthwhile initiative and provides a great insight into

Customer Service developments in the UK, judges are drawn from the banking, utilities, IT and retail sectors.

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 Site works charging regime¹⁰ 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.

¹⁰ <http://www.cer.ie/en/gas-distribution-network-current-consultations.aspx?article=bb4768ef-ab2f-403b-aecd-ae1a3d763f59>

Table 2.7.4

Bord Gais Networks Site-works Services Standards – Performance 2011		
Supplier Requested Work Returns		
Meter Related Activity Domestic & Commercial	Standard	Performance
Confirmation Out-turn/Read from Activity * -Special Read Requests. ** -All Other Requests. ***	90% ← 5 w/days. 100% ← 10 w/days. 90% ← 10 w/days. 100% ← 20 w/days.	79% ← 5 w/days. 84% ← 10 w/days. 97% ← 10 w/days. 98% ← 20 w/days.
Appointment Grant for Requests -Special Read Requests -All Other Requests	100%← 5 working days. 100%← 5 working days.	100% ← 5 working days. 100% ← 5 working days.
Supplier Requested Work Access Standards		
Meter Related Activity Domestic & Commercial	Standard	Performance
Isolation/ Disconnection Attended As Appointment Access % Achieved	100% 60%	100% 44%

All Other Activities		
Attended As Appointment Access % Achieved.	100% 100%	100% 92%

*Out-turn is the message sent back to the shipper (complete or no access). There were commissioning issues relating to the transition of data through new computer systems that delayed the reporting of completed activities.

****Special Reads**

Special reads are reads requested by customers through their shippers. Special Reads are carried out in instances of dispute with the customer regarding their bills. BGN carried out 24 of these requested jobs in 2011 down from 74 in the previous year. Special reads are charged to the customer. In the current economic climate customers are understandably slower to request a special read.

*** Meter fits, locks, unlocks exchanges etc.

Debt management

The lower than planned rate of access on shipper requested credit locks in 2011 are due to meters being located inside customer's homes combined with a further deterioration in household economic circumstances. When a BGN representative calls to lock the meter they may be 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.

Section 3: Other Performance Criteria

3.1 Shipper Issues

3.1.1 Breakdown of Opened Shipper escalations by type

There were 2089 issues escalated to Shipper Services Key Account Management in 2011.

The main categories of issue recorded were:

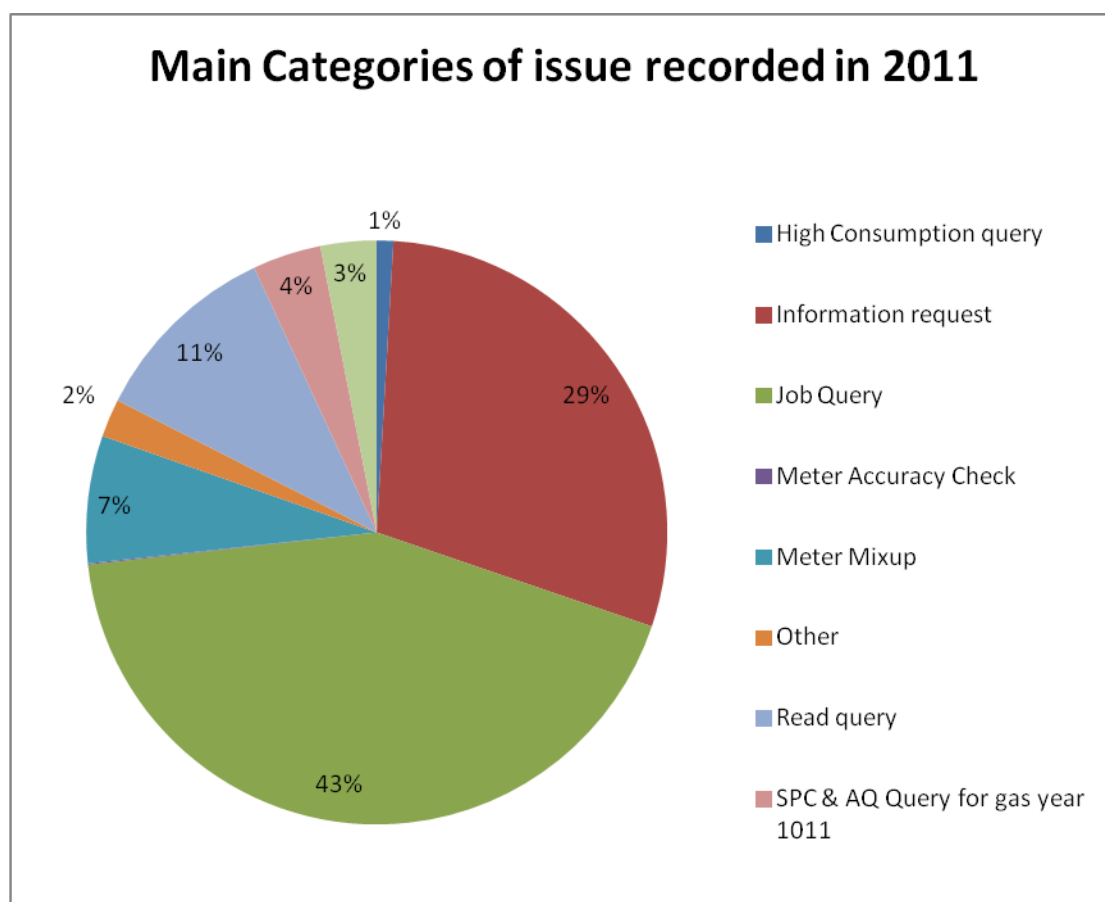


Figure 3.1.1

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 (962 information requests in 2010) is due to the interaction with the new market entrants that entered the NDM sector in 2011.

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 problems 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 6 business days.

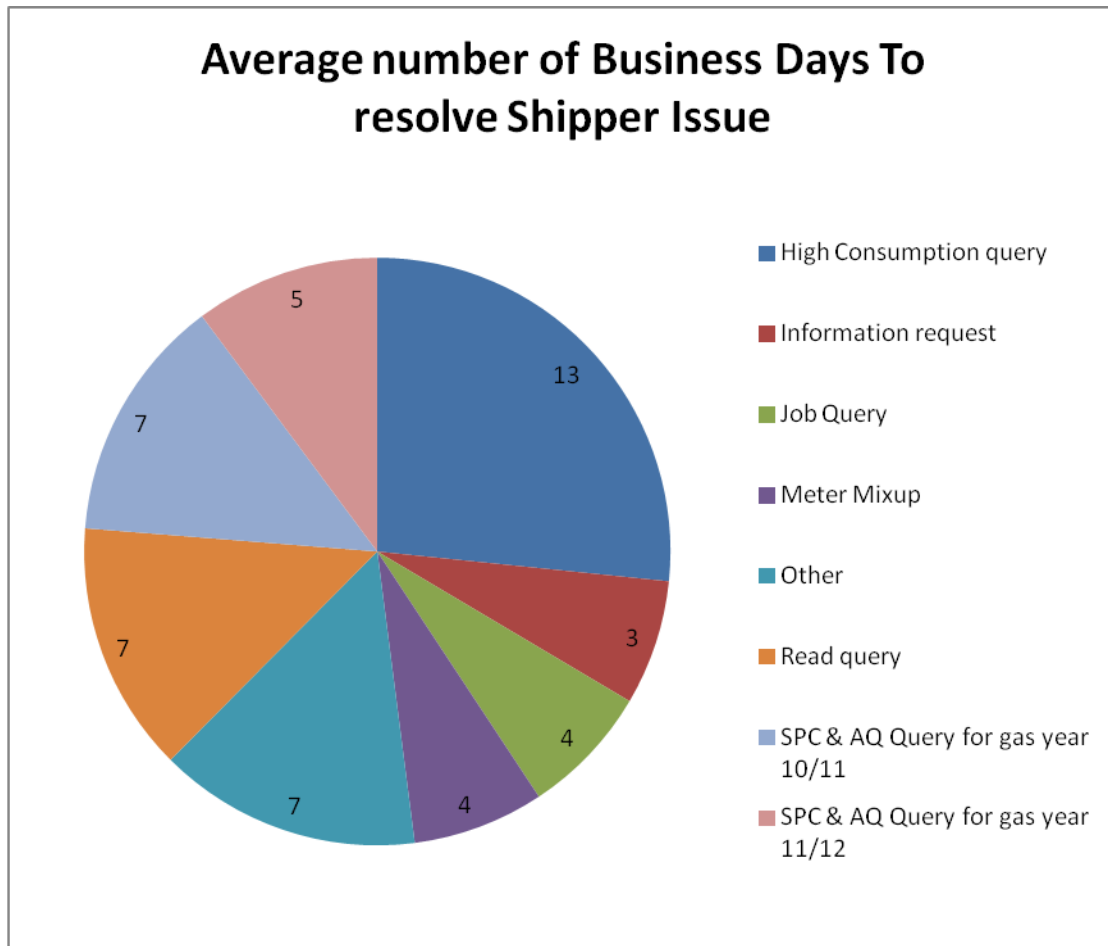


Figure 3.1.2

3.1.3 Shipper Issues Management

All Shipper issues are systematically logged by the Shipper Services Key Account Management function on the 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 2011*

Table 3.1.3

Customer Commitments	Performance Target	Actual Performance
Shipper Operations		
DM Change of Shipper	100%	100%
Entry Capacity Booking Requests	Process <= 20 days - 100%	100%
Exit Capacity Booking Requests	Process <= 20 days - 100%	100%
Trading and Settlements		
Invoice circulation	By 12 th day of month	100%
Provision of shrinkage gas quantity/cost estimates	Prior to October billing	100%
Meter Reading Services		
Access Rate	80%	86%
MRS Read Rate	Average 3.2 Reads per site per year	3.53
Forecasting, Allocation and Reconciliation (FAR) Domestic reconciliation	80% within accuracy of 1,250 kWh	90.30%
FAR IC reconciliation ¹¹	80% within accuracy of 4,500 kWh	74.47%

* Access rates, read rates and trading and settlements activities continue to perform well.

¹¹ The IC Band (AQ between 73,000 kWh and 5,500,000 kWh) is larger than RD (0 to 73,000 kWh) so more difficult to measure the metric. A reconciliation difference of 10,000kWh may be very acceptable for a site consuming millions of kWh, but not acceptable for a site consuming only a few tens of thousands kWh so the performance target is not as reflective of the IC sector as for RD.

Key Performance Indicator Comments												
Description	Standard	Performance	Reason									
FAR IC reconciliation within accuracy of 4,500 kWh	80%	74.47%	<p>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.</p> <table border="1"> <thead> <tr> <th># GPRN</th> <th>Before</th> <th>After</th> </tr> </thead> <tbody> <tr> <td>Read monthly (typically 12 actual reads per year)</td> <td>16,848</td> <td>9,655</td> </tr> <tr> <td>Read bi monthly (typically 3 reads per year before August 07)</td> <td>4,276</td> <td>13,276</td> </tr> </tbody> </table> <p>This adjustment freed up resources to increase the read frequency of bi-monthly read sites from 3 to 4 reads per year. The FAR metric for the bi-monthly read sites improved strongly. However, the adjustment also resulted in a 43% reduction in the number of sites read monthly, by moving the low AQ sites, which have a higher probability of having low reconciliation differences, into a bi-monthly cycle. High AQ sites are far less likely to satisfy the metric, as the median of reconciliation differences is approximately 4000kWh. This effect is reflected in the metric behaviour.</p> <p>The metric is far better suited to describing the performance of the FAR process for low AQ sites. The analysis showed that the metric is not well suited to large AQ sites and that the choice of metric is not conducive to evaluating the FAR process performance. A metric which measures reconciliation accuracy as a proportion of AQ may be more suitable for this purpose.</p> <p>Because the range for IC sites is so large this metric is not very reflective.</p>	# GPRN	Before	After	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
# GPRN	Before	After										
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