

Reference Service Proposal for the AGN Victorian and Albury Distribution Networks July 2023 – June 2028

July 2021



1. Introduction

We are developing our plans for our Victorian and Albury natural gas distribution networks for the July 2023 – June 2028 period (the next Access Arrangement (AA) period). As part of this process we have developed this Reference Service Proposal to ensure our plans and services to meet our customers' needs.

1.1. Pipeline services

We offer several pipeline services to meet customer needs, which are specified below:

- reference services, which form the basis of the prices and terms and conditions we develop for the next AA period. Tariffs for reference services are set by the Australian Energy Regulator (AER). Reference services fall into two categories:
 - haulage reference services – for the transportation of gas for our domestic, commercial and demand customers;
 - ancillary reference services – are commonly used services ancillary to providing a haulage service;
- non-reference services – less frequently used services. Prices and terms and conditions for these services reflect cost of providing the service but are not determined by the AER.

The classification of a service as either a reference or non-reference service is considered at the beginning of the AA review process, generally two years before the commencement of the next AA period.

We apply the reference service factors outlined in the National Gas Rules (NGR) to classify a service as either reference or non-reference. The final classification of services is approved by the AER. This is discussed further in section 1.4 below.

Table 2 provides a summary of the services offered during the current AA period and Table 3 sets out the proposed services for the next AA period (with strikethrough and new text to show where changes have been made).

We are proposing to largely maintain the same suite of reference services as was available in the 2018 - 2022/23 period (the current AA period). These services represent over 99% of our revenue in the current AA period to date and have been largely unchanged for more than a decade, reflecting the stable customer requirements of our network.

For the next AA period, this document outlines:

- our pipeline services;
- stakeholder engagement undertaken about our services; and
- which of our services we propose will form reference services.

1.2. About AGIG

Australian Gas Infrastructure Group (AGIG) is one of Australia's largest gas infrastructure businesses. We have over two million customers across every Australian mainland state and the Northern Territory, 34,900km of distribution networks, over 4,300km of gas transmission pipelines and 60 petajoules of gas storage capacity.

1.3. Victorian and Albury distribution network

Australian Gas Networks (AGN), part of AGIG, distributes gas to residential, commercial and industrial business customers in the Melbourne CBD, northern, eastern and outer southern areas of metropolitan Melbourne, the Mornington Peninsula, and northern, eastern and south eastern areas of Victoria.

A small section of our distribution network (around 20,000 customers) extends into NSW

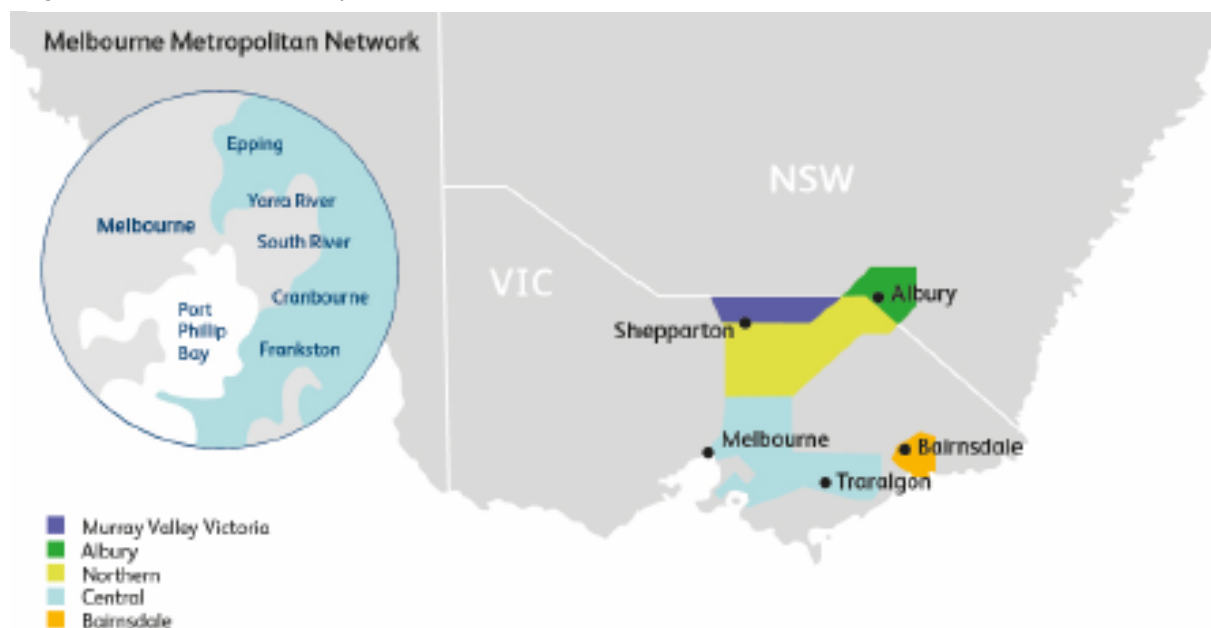
in Albury, and operates within the Victorian Declared Wholesale Gas Market (DWGM).

AGN delivers natural gas to more than 732,000 homes and businesses through 11,518 km of distribution network. Retailers pay charges for our services, which are

passed on to customers through retail gas bills.

Figure 1 shows our Victorian and Albury networks and a description of the networks is available on our website www.australiangasnetworks.com.au.

Figure 1: Our Victorian and Albury network



1.4. Regulatory framework

Under Rule 47A of the NGR we are required to provide the AER with a Reference Service Proposal 12 months prior to the submission of our Final Plan (or AA proposal) for the Victorian and Albury distribution networks.

Our Reference Service Proposal must list all the services we can reasonably offer on the network and specify at least one service as a reference service. Reference services form the basis of the reference tariffs approved by the AER.

The AER considers and approves our proposed reference services having regard to the reference service factors specified in the NGR,¹ and can also undertake its own

consultations with service users. The reference service factors are, in summary:

- actual and forecast demand for the service;
- the extent to which the service is substitutable for another service;
- the feasibility of allocating costs to the service;
- the usefulness of specifying a service as a reference service in supporting access negotiations and dispute resolution for other services; and
- the likely regulatory costs of making the service a reference service.

¹ NGR 47A(15)

1.5. Customer and Stakeholder Engagement

In developing our Plans for the next AA period, the Victorian gas distribution businesses (GDBs), AGN, AusNet Services and Multinet Gas Networks (MGN) are undertaking a joint program for the design and delivery of engagement activities.

AGN, AusNet Services and MGN have a history of working together and have all received recognition for commitment to quality customer and stakeholder engagement. This joint approach responds to feedback from consumer advocates and other stakeholders that network businesses should improve co-ordination of programs.

As part of the engagement program, the network businesses are undertaking a four-stage approach to engage and involve customers and stakeholders in our planning process. The Draft Engagement Plan can be found here:

<https://gasmatters.agig.com.au/victorian-draft-engagement-plan>

Our engagement program includes ongoing engagement with two reference groups: our Victorian Gas Networks Stakeholder Roundtable (VGNSR) and our Retailer Reference Group (RRG).

VGNSR represents a wide cross section of the community to ensure our AA proposal is developed in the long-term interests of customers and stakeholders. Membership of our VGNSR reflects the diversity of our customer base, with organisations representing residential customers, customers in vulnerable circumstances, older Australians, multicultural communities, business and industrial customers, builders and developers, and local government.

The RRG comprises representatives from gas retailers who operate in national markets which we serve, including Victoria and Albury.

Stage one of our engagement program has included a focus on the services we offer as well as which services should be considered as reference services. This process has sought to understand whether the proposed reference services are appropriate to meet customer needs and whether customers require additional services.

We met with our VGNSR on 3 March, 29 March and 27 May 2021 and with our RRG on 11 March, 31 March, 28 May and 16 June 2021. The agenda in each meeting included a discussion on services and the rule requirements for this Reference Service Proposal.

During this engagement we introduced the service requirements of the NGR and our full list of services. We discussed whether the current list of services appropriately addressed customer needs and whether there were any additional services that customers require.

We also explored alignment opportunities for services across the three networks in response to feedback from stakeholders and customer representative groups, which indicated they would like to see alignment of services across the GDBs, where possible. We presented our preliminary findings summarised below:

- the reference services offered by the Victorian GDBs are largely aligned; and
- there are differences in the non-reference services offered including their service descriptions.

We then circulated a draft Reference Service Proposal for AGN to our stakeholders and customer groups on 30 April for feedback, proposing that the current list of services be largely maintained.

We received two written submissions on the draft Reference Service Proposal. We held a separate RRG meeting on the 16 June 2021 to review feedback on the draft Reference Service Proposal and provided our proposed response before finalising the Reference

Service Proposal for submission to the AER. Stakeholder feedback on the draft Reference Service Proposal and AGN's response is summarised in Table 1 below.

At the meeting we also advised retailers of the proposed introduction of new Job Enquiry Codes² in 2021 for two services, (**Downgrade Meter Size** and **Pressure Change**) as part of AEMO's package of gas industry B2B work across all jurisdictions.

In response, we were proposing to introduce the two existing services (currently categorised under **Other non-reference services**), as separately identified non-reference services in the next AA period. Retailers did not raise any concerns with this proposal.

Table 1: Summary of customer and stakeholder feedback on the draft Reference Service Proposal

Topic	Feedback on the draft RSP	Our Response
Alignment of services, terminology and descriptions	<p>Stakeholders support efforts to align reference services across the GDBs, however considers alignment should only be pursued if it leads to a better outcomes for customers.</p> <p>One retailer submitted that GDBs should align the terminology and naming of services to ensure consistent understanding and use by retailers.</p>	<p>We are supportive of alignment of services, terminology and descriptions across the Victorian GDBs where it is appropriate to do so and will result in better outcomes for our customers.</p> <p>We have undertaken joint review with MGN and AusNet Services on whether we can bring further alignment of our services, and of the terminology and descriptions used. We have made changes to reflect alignment when the business practices across the Victorian GDBs are the same, but have maintained differences where they are not.</p>
Haulage reference service	Stakeholders support our proposal to retain current haulage reference services.	We are proposing to retain current haulage services.
Ancillary reference service	<p>Stakeholders support the continuation of current ancillary reference services.</p> <p>One retailer acknowledges the Disconnect in Street service has seen minimal to no usage (to date) but considers that both the economic changes brought about by COVID and the latest changes arising from the Essential Services Commission (ESC) Victoria changes to the Energy Industry Act (in relation to disconnections) may see an uptake of this service. It would prefer the service to be available (at least as a non-</p>	We note that MGN is proposing to offer the service as a non-reference service in the next AA period. We do not propose to separately identify this service (as it currently has zero volume) but this activity will be available as a quotable work under Other non-reference Services .

² Notice of AEMO decision (INO26/15)

Topic	Feedback on the draft RSP	Our Response
	reference service) until the next AA period.	
Non-reference services	<p>Stakeholders generally support the continuation of current non-reference services but raised the following issues:</p> <ul style="list-style-type: none"> one retailer is concerned that the Cross Meter Investigation service continues to be a non-reference service; in relation to the Same Day Premium service, one retailer observes that is unclear what premium would be added to which services (reference and non-reference); and one retailer would support an After-Hours Reconnection service (currently offered by MGN). 	<ul style="list-style-type: none"> We consider that the Cross Meter Investigation service should remain as a non-reference service given the low demand for the service to date. We note that we do not charge customers where a fault is found with the meter. We can confirm that the Same Day Premium service is generally a premium for the same day Reconnection service, equivalent to MGN's After Hours Reconnection service. We have amended the service description to reflect this.
Price transparency around non-reference services	<p>One retailer is concerned that non-reference services will not be subject to a form of price regulation. It submits that any customer that is required to pay for a non-reference service should have the power to question the cost of that service. The consumer should be entitled to ask the Victorian gas distributor for a breakdown of the costs for the relevant non-reference service. They should have 30 days to review those costs to determine if they are satisfied that they are reasonable. If they are not, they should be able to take their case to an independent arbitrator such as the ESC or the AER for review.</p>	<p>We have reviewed the non-reference services currently on offer and note that non-reference services are generally substitutable for reference services, so customers have a choice.</p> <p>We have also reviewed the current processes in which we offer non-reference services and confirm that we currently discuss and seek agreement on the charges with the customer or the retailer on behalf of the customer, before we perform the service.</p> <p>However, we acknowledge that increasing transparency around the costs of the non-reference services would benefit our customers and we intend to explore whether we can improve on existing processes.</p> <p>In terms of customer recourse to independent arbitration, customers can seek redress with the Energy and Water Ombudsman Victoria if they dispute the amount charged for a non-reference service. We also note that no charges have been disputed to date.</p>
Other matters	<p>One retailer submitted that:</p> <ul style="list-style-type: none"> for standing charges post disconnection, amendments should be made to existing arrangements where standing 	<p>We note that matters raised by the retailer are outside the scope of the Reference Service Proposal and will be addressed separately as part of the broader AA review.</p>

Topic	Feedback on the draft RSP	Our Response
	<p>charges would be halted (like Jemena Gas Networks, Electricity) for the period when a MIRN is disconnected; and</p> <ul style="list-style-type: none"> for zero consumption sites, the retailer would like to work more closely with gas DBs to identify and establish an agreed process for managing zero consumption (periods > 12-18 months) sites. 	

1.6. Services in 2018 – 2022/23

The reference services offered by AGN in the current AA period are outlined in Table 2 below.

Table 2: Reference Services available on the Victorian and Albury distribution networks over the current AA period

Service	Description
Haulage Reference Services	
Volume Haulage Service	<p>The delivery of gas through an existing Volume Delivery Point (DP). A DP is a volume DP for a given period if it is not a Demand DP.</p>
Demand Haulage Service	<p>The delivery of gas through an existing Demand DP. A DP is a Demand DP if the Quantity of Gas delivered at that DP has either:</p> <ul style="list-style-type: none"> exceeded 10 TJ in the preceding 12-month period (or, if less than 12 months of data is available, 10 TJ reduced in proportion to the period for which data is available as a proportion of 365 days); or exceeded 10 GJ in any hour during the preceding 12 months.
Ancillary Reference Services	
Meter and Gas Installation Test	On-site testing to check the measurement accuracy of a Metering Installation and the soundness of the gas installation downstream of the Metering Installation.
Disconnection	Disconnection by the carrying out of work using locks or plugs at a Metering Installation in order to prevent the withdrawal of Gas at the DP.
Reconnection	Action to restore the ability to withdraw Gas at a DP, following an earlier Disconnection (that is, the removal of any locks or plugs used to isolate supply, performance of a safety check and, where necessary, the lighting of appliances).
Meter Removal	Removal of a meter at a Metering Installation in order to prevent the withdrawal of Gas at the DP.

Meter Reinstallation	Reinstallation of a meter at a Metering Installation, performance of a safety check and the lighting of appliances where necessary.
Special Meter Read	Meter reading for a DP that is in addition to the scheduled meter reading that forms part of the Haulage Reference Service. (Special Meter Reads will be charged in accordance with location as either metropolitan or non-metropolitan).
Non-reference Services	
Same day premium charge	Used for jobs requested to be done on the same day. This premium is in addition to the original job charge.
Disconnect service in street for debt – requiring excavation	This may be requested by a retailer or by Distributor as a matter of safety, when disconnection of supply is intended to be longer term due to non-payment of outstanding account by consumer.
Incomplete Meter Fix	Original meter fix request was unable to be completed on appointment date due to site not ready and includes 'no access to site' or appliances not installed.
Alter Meter Position	To be used when a customer is requesting the relocation of an existing gas meter to a new position.
Attend meter fix after faults rectified	Where a consumer requests a meter to be connected to a property where the gas main and service pipe are already connected.
No Access (gas meter)	Field crew could not gain access to the property on the agreed day to perform the service.
Other	This code is used where no other code is applicable. Not to be used as work around for system or process problems.
Cross Meter Investigations	Used when investigating Cross Meter enquiries - charged if not a Crossed Meter.
Reconnect Service in street after payment	Used to request reconnection of gas supply, previously disconnected in the street, following satisfactory payment by consumer (or other agreed arrangement).
Relocate service pipe	Used to relocate the service or "Inlet" pipework.
Upgrade service request	Used when the increased gas load requires a larger capacity of service line to be installed.
Appointment for special read – Metro & Non Metro	Request for an appointment to read a meter in addition to scheduled meter reading.

1.7. Proposed services for 2023/24 – 2027/28

Our full list of proposed services is included in Table 3, including our reference services for the next AA period. The proposed reference services remain the same as those in the current period, with one service (**Appointment for Special Meter Read**) proposed to be reclassified from non-reference service to an ancillary reference service.

Table 3 reflects on the reference service factors, by considering what we think are key factors for each service.

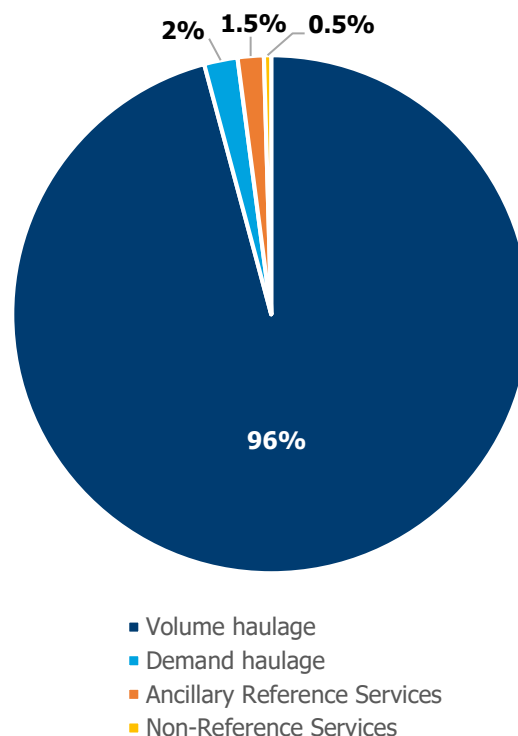
For all ancillary reference services and non-reference services, we have also included information on the total number of times the service has been used in the current AA period, and the average annual revenue from the service during the current AA period where available, as well as any other information relevant to the reference service factors.

Changes to the specific terms and conditions for each service will be considered in the next phase of our engagement program after the Reference Service Proposal is approved by the AER.

1.7.1. Reference services

In the current AA period, reference services make up over 99% of our revenue on the Victorian and Albury distribution networks (see Figure 2).

Figure 2: AGN Victoria and Albury revenue share 2016 to 2020



Our haulage reference services remain the most appropriate to specify as reference services. These services:

- have the highest demand and form the basis of our forecasts;
- are generally not substitutable with other services;
- have largely predictable costs which can be attributed to individual users, and others can be reasonably allocated across users of a particular service;
- form the basis for negotiated access; and
- generate most of our revenues; or
- were specifically requested by retailers or other stakeholders to be reference services.

Based on our assessment of the reference service factors, we propose to largely maintain our current haulage and ancillary

services listed in Table 3 as reference services for the next AA period.

We are proposing to reclassify **Appointment for Special Read** service as an ancillary reference service under the **Special Meter Read** service for the next AA period.

1.7.1.1. Potential customer impact

Changing the classification for the **Appointment for Special Read** service to an ancillary reference service will not alter the service our customers receive and therefore we do not foresee the proposal having an impact on our customers.

Our proposed haulage and ancillary services are listed in Table 3 as reference services for the next AA period.

1.7.2. Non-reference services

We consider that other services do not require classification as reference services, having regard to the reference service factors, particularly those relating to substitutability, consistency of demand and the allocation of costs.

Firstly, some non-reference services are substitutable with regular services. For example, premium services like the **Same Day Premium** service can in almost every case be substituted with the equivalent ancillary reference service (the **Reconnection** service).

In addition, several non-reference services have low and/or unpredictable demand. For example, several are not frequently required (**Upgrade Service Request**, **Disconnect service in street for debt – requiring excavation** and **Reconnect service in street after payment**). Further, three services (**Attend meter fix after faults rectified**, **Cross Meter Investigations** and **Relocate Service Request**) have not been used at all.

Similarly, non-reference services often have highly variable costs depending on the

specific customer requirements. For example, the costs of **Meter Alter**

Position/Removal will vary depending on the specific circumstances e.g. the distance the meter is required to be shifted.

No Access and **Incomplete Meter Fix** – are not services in and of themselves, but rather separate fixed charges that we charge in relation to existing services like the **Meter Reinstallation** service where the relevant service cannot be provided due to circumstances outside our control.

In terms of the **installation of second service valve in a pit and disconnect gas supply** service, we are not proposing to separately identify the service as a non-reference service given there has been no request for the service during the current AA period. However, AGN may agree to offer the service if we receive a request in the future, with costs to be determined on a case by case basis.

Also, in response to AEMO proposing to introduce new Job Enquiry Codes later this year for the two services (**Downgrade Meter Size** and **Pressure Change**), we are proposing to treat the two existing non-reference services (currently categorised as **Other non-reference services**) as separately identified non-reference services in the next AA period.

Furthermore, in the last five years (2016 to 2020), non-reference services make up only 0.5% of our revenues.

Finally, it is worth noting AGN operates across a range of markets, not just in Victoria, and we aim to maintain a consistent set of reference services across all of these areas. Consistency in approach across markets is important for minimising our costs.

Based on our assessment of the reference service factors, we propose to largely maintain the current suite of non-reference services listed in Table 3 for the next AA period.

As outlined in section 1.7.1.1, changing the classification for the **Appointment for Special Read** service to an ancillary reference service will not alter the service our customers receive and therefore we do not foresee the proposal having an impact on our customers.

2. Conclusion

This Reference Service Proposal has been prepared to ensure our plans are developed to meet our customers' needs and the requirements of the NGR.

We offer several pipeline services to meet our customers' needs, including reference services for haulage and ancillary purposes.

Based on stakeholder and customer representative group feedback, we are proposing to largely maintain the same suite of reference services for the next AA period.

Table 3: Proposed services for the Victorian and Albury distribution networks 2023/24 – 2027/28

Service	Description	Issues relevant to the Reference Service Factors
Haulage Reference Services		
Volume Haulage Service	<p>The delivery of gas to through an existing Volume Delivery Point (DP). A DP is a volume DP for a given period if it is not a Demand DP.</p>	<ul style="list-style-type: none"> • High demand • Not substitutable • Predictable costs which can be reasonably allocated across users • Forms the basis of regulatory proposals
Demand Haulage Service	<p>The delivery of gas through an existing Demand DP. A DP is a Demand DP if the Quantity of Gas delivered at that DP has either:</p> <ul style="list-style-type: none"> • exceeded 10 TJ in the preceding 12 month period (or, if less than 12 months of data is available, 10 TJ reduced in proportion to the period for which data is available as a proportion of 365 days); or • exceeded 10 GJ in any hour during the preceding 12 months. 	<ul style="list-style-type: none"> • High demand • Not substitutable • Predictable costs which can be reasonably allocated across users • Forms the basis of regulatory proposals
Ancillary Reference Services		
Meter and Gas Installation Test	On-site testing to check the measurement accuracy of a Metering Installation and the soundness of the gas installation downstream of the Metering Installation.	<ul style="list-style-type: none"> • Annual average usage: 155 • Annual average revenue: \$33,062 • Low demand • Fixed charge allocated to individual user
Disconnection	Disconnection by the carrying out of work using locks or plugs at a Metering Installation in order to prevent the withdrawal of Gas at the DP.	<ul style="list-style-type: none"> • Annual average usage: 10,062 • Annual average revenue: \$704, 025 • Moderate demand • Fixed charge allocated to individual user

Reconnection	Action to restore the ability to withdraw Gas at a DP, following an earlier Disconnection (that is, the removal of any locks or plugs used to isolate supply, performance of a safety check and, where necessary, the lighting of appliances).	<ul style="list-style-type: none"> • Annual average usage: 10,796 • Annual average revenue: \$878,942 • Moderate demand • Fixed charge allocated to individual user
Meter Removal	Removal of a meter at a Metering Installation in order to prevent the withdrawal of Gas at the DP.	<ul style="list-style-type: none"> • Annual average usage: 1,766 • Annual average revenue: \$177,046 • Low demand • Fixed charge allocated to individual user
Meter Reinstallation	Reinstallation of a meter at a Metering Installation, performance of a safety check and the lighting of appliances where necessary.	<ul style="list-style-type: none"> • Annual average usage: 70 • Annual average revenue: \$6,976 • Low demand • Fixed charge allocated to individual user
Special Meter Read	Meter reading for a DP that is in addition to the scheduled meter reading that forms part of the Haulage Reference Service. This service also includes a service request for an appointment to read a meter.	<ul style="list-style-type: none"> • Annual average usage: 215,290; 1297 (appointment) • Annual average revenue: \$2.1 million; \$35,717 (appointment) • High demand • Fixed charge allocated to individual user
Non-reference Services		
Same day premium charge	Used for jobs requested to be done on the same day. This premium is in addition to the original job charge like the reconnection service.	<ul style="list-style-type: none"> • Annual average usage: 1,058 • Annual average revenue: \$228,884 • Moderate demand • Substitutable with regular service • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate

Disconnect service in street for debt – requiring excavation	This may be requested by RB, or by Distributor as a matter of safety, when disconnection of supply is intended to be longer term due to non-payment of outstanding account by consumer.	<ul style="list-style-type: none"> • Annual average usage: 51 • Annual average revenue: \$33,730 • Low demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
Incomplete Meter Fix	Original Meter Fix request was unable to be completed on appointment date due to site not ready and includes 'no access to site' or appliances not installed.	<ul style="list-style-type: none"> • Annual average usage: 1,456 • Annual average revenue: \$222,444 • Moderate demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
Alter Meter Position	To be used when a customer is requesting the relocation of an existing gas meter to a new position.	<ul style="list-style-type: none"> • Annual average usage: 366 • Annual average revenue: \$270,967 • Low demand • Variable costs requiring quotation (Charges for this service vary to reflect the cost for each customer. From 2016 to 2020 charges range from \$90 to \$2,000) • The regulatory costs are likely to be disproportionate
Attend meter fix after faults rectified	Where a consumer requests a meter to be connected to a property where the gas main and service pipe are already connected.	<ul style="list-style-type: none"> • Annual average usage: 0 • Annual average revenue: \$0 • Low/unpredictable demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
No Access (gas meter)	Field crew could not gain access to the property on the agreed day to perform the service.	<ul style="list-style-type: none"> • Annual average usage: 4039 • Annual average revenue: \$278,408

		<ul style="list-style-type: none"> • Moderate demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
Other non-reference services	<p>Any other non-reference service requested by the customer or retailer and which the Service Provider agrees to provide.</p> <p>This code is used where no other code is applicable. Not to be used as work around for system or process problems.</p>	<ul style="list-style-type: none"> • Annual average usage: 0 • Annual average revenue: \$0 • Low/unpredictable demand • Variable costs requiring quotation • The regulatory costs are likely to be disproportionate
Cross Meter Investigations	Used when investigating Cross Meter enquiries - charged if not a Crossed Meter.	<ul style="list-style-type: none"> • Annual average usage: 0 • Annual average revenue: \$0 • Low/unpredictable demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
Reconnect Service in street after payment	Used to request reconnection of gas supply, previously disconnected in the street, following satisfactory payment by consumer (or other agreed arrangement).	<ul style="list-style-type: none"> • Annual average usage: 24 • Annual average revenue: \$16,285 • Low/unpredictable demand • Fixed charge allocated to individual user • The regulatory costs are likely to be disproportionate
Relocate service pipe	Used to relocate the service or "Inlet" pipework.	<ul style="list-style-type: none"> • Annual average usage: 0 • Annual average revenue: \$0 • Low/unpredictable demand • Variable costs requiring quotation • The regulatory costs are likely to be disproportionate

Upgrade service request	Used when the increased gas load requires a larger capacity of service line to be installed.	<ul style="list-style-type: none"> • Annual average usage: 0 • Annual average revenue: \$306 • Low/unpredictable demand (Used once in 2016) • Variable costs requiring quotation • The regulatory costs are likely to be disproportionate
Appointment for special read— Metro & Non Metro	Request for an appointment to read a meter in addition to scheduled meter reading.	<p>Annual average usage: 1297</p> <p>Annual average revenue: \$35,717</p> <p>Moderate demand</p> <p>Substitutable with during hours Special Meter Reading (Reference Service): the service represents 0.58% of special meter reads, with the vast majority undertaken as a reference service</p> <p>Fixed charge allocated to individual user</p>
Downgrade Meter Size	To be used where a retailer requests a customer's meter to be downgraded.	<ul style="list-style-type: none"> • Usage: 0 • Revenue: 0 • Low/unpredictable demand • Variable costs requiring quotation • The regulatory costs are likely to be disproportionate
Pressure Change	To be used when a customer requests a change in gas pressure and may involve a regulator.	<ul style="list-style-type: none"> • Usage: 0 • Revenue: 0 • Low/unpredictable demand • Variable costs requiring quotation • The regulatory costs are likely to be disproportionate