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Statutory Consultation on proposals to modify licence conditions as a result of Retail Code Consolidation

Thank you for the opportunity to respond to this consultation. The Gas Distribution Networks (GDNs) are providing a consolidated response which will consider only the elements of the consultation relating to our licences. We note that the following Standard Licence conditions are switched off for GDNs and replaced by Standard Special Conditions (SSCs).

Licence condition switched off:	Replaced with:
Standard Condition 8: Provision and return of meters	Standard Special Condition D17: Provision and return of meters
Standard Condition 31: Supply Point Information Services	Standard Special Condition A31: Supply Point Information Services

In respect of all instances where Meter Asset Manager is replaced with Meter Equipment Manager, we agree that this change is correct and appropriate to implement the Retail Code Consolidation (RCC) Significant Code Review (SCR) which is due to be implemented on 1 September 2021.

Changes to Standard Condition 14: Compliance with Core Industry Documents to remove the Supply Point information Agreement (SPAA), and changes to Standard Special Condition D17: Provision and Return of Meters to replace reference to SPAA with the Retail Energy Code (REC) are also correct and appropriate.

However, the GDNs continue to have significant concerns about the proposed changes to SSC A31. There continues to be a misunderstanding of the services provided by this Licence condition. This condition provides a number of services, many of which are to non-Supplier parties. We believe that the inclusion of a derogation will not remove the requirement for considerable work to ensure that the non-Supplier elements continue to be provided.

SSC A31 provides services to both Shippers and consumers, not just Suppliers, and these are not suitably addressed by including the derogation element. While the inclusion of the derogation arrangement will provide potential flexibility in future, the detailed work to establish future arrangements should result in enduring Licence changes that will remove any dual governance, improve transparency of Transporter obligations and provide clarity of service delivery to the wider industry and service recipients. We believe that these changes are not required for RCC but will be required later when Central Switching Service (CSS) goes live. Without making the required enduring changes and by instead using the derogation, an inherent inefficiency is being built into the future delivery of services, which is likely to impact future customers.

The current Data Enquiry Service, which is proposed to become the Gas Enquiry Service, is currently delivered to Suppliers through the Supply Point Administration Agreement, Schedule 23, and not as a direct result of SSC A31.

In line with the annex provided by GDNs during the informal consultation (appended), services to Shippers will continue to be provided by the Central Data Service Provider (CDSP) through Uniform

Network Code (UNC) and Data Service Contract (DSC) provisions. We note that the requirement for services to be provided by the CDSP is to provide assurance to Shippers of common services, and our current view is that it is more appropriate to improve the clarity of these services within the UNC to provide enduring arrangements for service delivery through the DSC. GDNs are currently considering how best to proceed with this through existing UNC and DSC governance, although we would again note that such clarifications should not replace the detailed review and associated licence changes discussed above.

The “Who’s my Supplier” service, which is also delivered as a result of SSC A31, is a retail consumer service. Once the CSS becomes the central owner of the supplier registration data, we believe it would be appropriate for this service to be taken over by the CSS rather than GDNs continuing to provide this as a third party, the latter of which would involve unnecessary data hand-offs and an indirect and therefore less efficient service. We acknowledge that this is not necessarily a “day 1” requirement and the service can remain uninterrupted until such time as a transfer of the arrangements can take place. At that point the entirety of the existing service provision of this service should transfer, including the associated licence changes.

In light of the above, we believe that the work to ensure enduring arrangements for the SSC A31 services should be completed as part of the proposed December consultation.

Please contact me should you have any queries about this response.

Yours sincerely

By email

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SSC A31 Services

SSSC A31	Description	UNC/DSC delivery	REC implications	Additional notes
Para 1	Requirement to establish, procure, operate and maintain the Supply Point Information Service consistent with A15	N/A	Services to be delivered by CDSP, so CSS/ REC service not compliant	
Para 2 (a)	Maintain a register of specific data (contained in para 3)	UK Link used to provide register	Data will be sourced through REC and the CSS data flows	Data will continue to be held in UK Link
Para 2 (b)	Amend data to reflect change of supplier	UK Link updates through UNC data flows	Data will be sourced through REC and the CSS data flows	Data will continue to be amended in UK Link
Para 2 (c)	Provide a service to domestic customers for certain data items (defined in para 3)	Who's my Supplier telephone and web service delivered through DSC ASGT-NC SA16-06 (ASGT-NC SA12-06 from 1/4/21)	REC delivery of a direct domestic consumer service does not discharge obligation, so will need to continue to be provided by Xoserve	As GTs are required to procure the service, procurement of the identical service by REC Co would not discharge GT obligation, potentially leading to duplication
Para 2 (d)	Provide a service to Shippers, persons defined in UNC and non-domestic consumers	Xoserve telephone service provided to shippers through DSC ASGT-NC SA16-07 (ASGT-NC SA12-07 from 1/4/21)	REC delivery of a service to suppliers not compliant with requirements to provide information to shippers or other parties	GTs may be required to continue to provide a shipper facing service as shippers not party to REC. Shipper service can be delivered by UNC obligation
Para 2 (e)	Maintenance of the domestic service free at the point of delivery	Who's my Supplier telephone and web service delivered through DSC ASGT-NC SA16-06 (ASGT-NC SA12-06 from 1/4/21)	REC delivery of a direct domestic consumer service does not discharge obligation, so will need to continue to be provided by Xoserve	As GTs are required to maintain the service, service by REC Co would not discharge GT obligation, potentially leading to duplication
Para 2 (f)	Advertise the service adequately	Xoserve advertise service in phone book and through website	REC Co would need to advertise their service (which may differ)	Only CDSP service discharges GT obligation
Para 3 (a) (i)	Identity of Shipper responsible under UNC	UK Link holds shipper short code and name as provided by the	Identification of shipper will be sourced through a	Process for non-CSS supply points needs to be maintained through UNC

		shipper through the nomination/confirmation UNC flows	new CSS data flow, other than non-CSS supply points	
Para 3 (a) (ii)	Metering equipment	UK Link holds meter technical details (MTD) as provided by the shipper through RGMA flows	RGMA flows unchanged	For CSS/REC service this data would need to be provided by Xoserve
Para 3 (a) (iii)	Unique and accurate address	Provided by GTs on MRPN creation	REL and MPL may be different in REC, but MPL address continues to be provided by GT	In REC, GTs will only be able to change the MPL address, not the REL, and may not be able to view the REL
Para 3 (b) (i)	Information for managing supply of gas	I've never been able to identify specific data against this!		
Para 3 (b) (ii)	Information for assessing the accuracy of charges	Billing data – AQ, SOQ, consumption from meter reads, CV. Currently held in DES or provided in IX data flows to shippers	Not included	GTs will be required to continue to provide data to shippers to verify charges – provided under UNC
Para 3 (b) (iii)	Information to enable switching	We sometimes get consumer/supplier queries about things like MSC or meter point status which is preventing a switch, but there is no detailed specification	CSS Gas Enquiry Service (GES) should provide sufficient data for suppliers	GES would not discharge GT obligation as not procured through CDSP, potentially leading to duplication
Para 3 (b) (iv)	Information identifying the supplier	Supplier Short Code and name as provided by Shipper through nomination/confirmation flows	Information provided by supplier to CSS will need to be passed to CDSP	No change to GT data flows, just source of information changed except for non-CSS supply points
Para 4	Not restrict, distort or prevent competition in metering or supply services	Use of standard UNC processes ensures this	REC service could ensure this other than it needs to be a CDSP service	Standard clause found in many conditions
Para 5 (i)	Provide pressure information associated with new connections	Provided by GTs through GT1 and connections processes	N/A	Will continue in-house
Para 5 (ii)	Provide information required for chargeable reinforcement	Provided by GTs through connections processes	N/A	Will continue in-house
Para 6 (a)	Grounds for refusal if prejudicially affecting commercial interests	N/A	N/A	N/A

Para 6 (b)	Grounds for refusal if person refuses to enter into contract	N/A	N/A	UNC, UIP FCA, connections agreements
Para 6 (c)	For 2 (e), grounds for refusal if pre-notified costs not paid (by non-domestics)	Not currently chargeable	N/A	
Para 7	For 5, not required to produce information that could not be compelled for court	N/A	N/A	N/A