

Smell gas?

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Rachel Clark
Ofgem
Switching Programme

Email: switchingprogramme@ofgem.gov.uk

28th July 2021

Dear Rachel,

Re: The Retail Energy Code – proposals for version 3.0

Thank you for the opportunity to provide representation on the above noted proposal. Northern Gas Networks has been actively involved in discussions and has been continually monitoring proposed changes to the Retail Energy Code. We have set out our responses to the specific questions in the consultation in Appendix 1.

The main point we would like to highlight from our consultation responses is:

Whilst we agree that Supplier data should be available via the Gas Enquiry Service (GES), we believe that the existing established Data Enquiry Service (DES) should remain the primary source and storage of Shipper and Transporter owned data which is required for operational purposes. Additional details are provided in Appendix 1.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215743



we are
the network


Northern Gas Networks Limited is registered in England and Wales, no. 5167070.
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Appendix 1
Consultation questions and responses.

REC v3.0 Schedules

Question 2.1: Do you agree that access to data within the GES should be governed under the provisions of the REC?

We agree that access to Supplier data related to switching should be accessible under GES and that it is appropriate for this to be governed under provisions in the REC. It should be noted that Transporter and Shipper related data should continue to be stored and accessed via the Data Services Contract (DSC) via DES to meet both requirements of the Uniform Network Code (UNC) and existing Shipper and Transporter operational processes, especially important as Shippers are not a Party to REC.

The Data Permission Matrix (DPM) exists in the UNC, where the UNC Modification Panel will approve any new user types, with the DSC Contract Management Committee approving the specific items of data and how they will be delivered. We have some concern as to the dual governance of all data items being managed under the REC, as well as under UNC. Permissions to certain data items may be denied under UNC, however the requester would then have ability to re-request under the REC Data Access Matrix for a potentially different outcome.

We note that whilst Shippers are not obligated to become parties to the REC, and are not obligated to use GES, that they have the option to sign a REC Service User Access Agreement to facilitate access to GES. In doing so the Shipper will be governed by the clauses within this agreement. With reference to the clauses relating to Intellectual Property Rights and Data Controller; these will govern the use of Shipper data within GES, however it is unclear how Shippers who have not signed the REC Service User Access Agreement will be bound, and their data used.

We would like to raise concern in relation to clause 13.19 (b) of the REC Main Body, as this states that all Services Data held within the Central Gas Register shall be owned by the relevant Gas Transporter. This appears to not align with clauses 13.20 & 13.21, around indemnity and ownership of data. We would suggest that clause 13.19 (b) is revised to account for Transporters having ownership and liability under the UNC in relation to data to data governed by UNC, and to make it clear that REC Co is liable for data once entered into the REC.

Question 2.2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?

We agree that a timescale for deactivation of registration is appropriate, and as such 10 working days would seem a reasonable period. It should be noted that as a Gas Transporter, we are unaware of any additional restrictions that may dictate a different time period, and therefore may be unaware of additional factors that could influence or amend this response.

Additional information

Comments on service definitions.

Please see comments above in relation to Gas Enquiry Service. We have no comments in relation to the other service definitions.

Find my Supplier service

Although not directly related to GES we ask that Ofgem consider whether the "Find my Supplier" service should be delivered as a service under REC. Find my Supplier offers a direct service to Suppliers retail customers, which would support faster switching. Currently this service is provided by Transporters under

our Licence (standard condition A31), therefore any migration to Suppliers under REC will also need to be aligned with appropriate changes to Transporter licence conditions. Provision of this service by Transporters was appropriate whilst the Meter Point Reference Number (MPRN) was owned by the UNC, however under REC the primary source becomes CSS therefore it would seem sensible for this service to also move ownership.

Addendum to Consultation

The addendum dated 4th June 2021 states that the UNC text provided is for REC V3, however the published UNC document is in relation to REC V2, the Retail Code Consolidation SCR, rather than the REC V3 the Faster Switching SCR. Therefore:

- We agree that the text is suitable for REC V2
- We do not believe that any UNC text relating to REC V3 has been published by Ofgem for consideration as part of this, or any separate, consultation