

**Date**  
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**Nicola Garland**  
Switching Programme  
Ofgem  
10 South Colonnade, Canary Wharf  
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Dear Nicola,

**Statutory consultation on proposals to modify licence conditions related to the Switching Programme**

Thank you for the opportunity to respond to Ofgem's statutory consultation on proposals to modify licence conditions related to the Switching Programme. This response is made on behalf of Cadent and can be published by Ofgem.

Our responses to the individual questions within the consultation are set out below. We have chosen not to provide responses to certain questions which we deem to be non-Gas Transporter related. Please contact me should you wish to discuss any aspect of this consultation response.

**Question 3: Do you agree that the proposed changes to the Gas Transporter Standard Special Conditions (Part A) will ensure the licence reflects the necessary conditions for implementation of the Switching Programme?**

Standard Special Condition (SSC) A31 of the Gas Transporter Licence requires conformity with SSC A15, which sets out that the services listed in A31 must be provided by licensees through the Central Data Service Provider (CDSP).

We agree the proposed changes to the Gas Transporter Standard Special Conditions reflects the necessary conditions for implementation of the Switching Programme. The inclusion of condition 2A to SSC A31 acknowledges that some of these services may be delivered through a body other than the CDSP. For example, via a code that the licensee is a party to, such as through the Retail Energy Code (REC).

While the proposed change addresses the issue of licensees not being compliant with SSC A15, which was a compliance concern raised in our earlier consultation response submitted in January 2021, a risk remains that licence obligations are being delivered through a Code that can be amended contrary to what is in the licence. Our view is that if the provision of a service is in the REC or other industry code, such as the Uniform Network Code (UNC), then a party should not be under a licence obligation to provide that service in a particular way, or to a particular standard. We therefore think that further changes are required to A31 to remove licence obligations to services that are now defined in REC and we suggest that Ofgem include this in its forward work plan.



Yours sincerely

**Gurvinder Dosanjh**

Industry Codes/Xoserve Contract Manager