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on 0800 111 999

Future System Operation  
Office of Gas and Electricity Markets  
10 South Colonnade  
Canary Wharf  
London E14 4PU

[FSO@ofgem.gov.uk](mailto:FSO@ofgem.gov.uk)

14<sup>th</sup> June 2024

Dear Department of Energy Security and Net Zero, & Ofgem

**Re: FSO Code Change Programme – Statutory consultation on modifications to industry codes to implement the Independent System Operator and Planner (ISOP)**

Thank you for the opportunity to provide representation on the above noted Statutory Consultation. As a Gas Transporter Northern Gas Networks (NGN) is only party to one of the listed codes, the Uniform Network Code (UNC), and therefore we only responding only in relation to proposed changes to this code. This response is not considered confidential and may be published in full.

We have reviewed the proposed amendments to the UNC and are supportive of the changes, as these appear consistent with the objectives of the Energy Code Reform and Future System Operator Code Change Programme.

We note that The Secretary of State can provide direction to the ISOP for matters of National Security, in which case the ISOP can seek temporary relief from liabilities where a direction contradicts code, and that any impacted party informed of this. We acknowledge and understand the need for this addition.

We understand that whilst ISOP is added to the UNC panel as a non-voting member and are added to Central Data Services Provider (CDSP) as a new class of customer, again with the ability to attend as a non-voting member, that there is aspiration for these to become voting members in the future. We therefore ask for consideration to be given in relation to any impact this will have regarding the balance of representation of voting parties.

**we are  
the network**

Northern Gas Networks Limited is registered in England and Wales, no. 5167070.  
Registered office: 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU



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The consultation document refers to the August 2023 call for volunteers, and subsequent Cross-Code Workgroup that was established from a select number of responders. Whilst we support the need to limit the number of participants in the workgroup, we consider that the group would better be able to achieve its objectives if attendees are permitted discuss potential options with their respective constituency members. This would enable them to seek feedback from these additional parties and bring these views into the discussions. Without this there is a risk of unconscious bias, and that the workgroup outcomes may be based on individual organisations perspectives, rather than from the whole of industry.

I hope these comments will be of assistance and please contact me on details provided below should you require any further information on this response.

Yours sincerely,



Tracey Saunders (via email)  
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