

**Smell gas?**

Call the National Gas Emergency Service  
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)

28<sup>th</sup> June 2024

Dear Ofgem

**Re: Consultation on Associated Documents to the proposed NESO licences – regulatory framework documents**

Thank you for the opportunity to provide representation on the above noted Consultation. As a Gas Transporter, Northern Gas Networks (NGN) do not consider that we are best placed to comment on the electricity impacts, and therefore this response is only from a gas perspective. This response is not considered confidential and may be published in full.

The amended Associated Documents within this consultation do not seem to consider gas to the same degree as electricity. We appreciate that these were originally electricity only documents that are now being updated and this may lead to a natural bias within the wording, however, we would like to see a more 'whole system' approach throughout the revised wording. Therefore whilst we acknowledge that the day one focus will be primarily in relation to electricity, we consider it would be sensible for the documents to still refer to gas throughout. We consider it vital that future consultations include gas planning, in equal measures to electricity planning, to be able to effectively achieve whole system approach and facilitate a cohesive energy industry.

Additionally, clarity is needed on defined terms within these documents, especially in relation to terms that are common across both electricity and gas; for example *energy* and *transmission*. As written, it is not clear as to whether these relate to electricity and gas, or just electricity.

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)  
[Northern Gas Networks Ltd](#)  
[Head of Market Regulation and Compliance](#)  
Mobile: 07580 215743

**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



Part of your monthly gas bill goes towards keeping your gas supply flowing and providing a fast and efficient emergency response service if you smell gas. To find out more visit: [northerngasnetworks.co.uk/goodtoknow](https://northerngasnetworks.co.uk/goodtoknow)

For information on how we use your details please visit: [northerngasnetworks.co.uk/legal-information](https://northerngasnetworks.co.uk/legal-information)

**w** [northerngasnetworks.co.uk](https://northerngasnetworks.co.uk)  
**t** +44 (0) 113 397 0034  
**a** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU