

1<sup>st</sup> December 2025

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**Non-Confidential Response - Consultation on the future of regulated traditional gas metering obligations beyond 31<sup>st</sup> December 2025**

Thank you for inviting us to respond to this consultation. We have reviewed the proposed Licence amendments and support the removal of sunset clauses that effectively end Gas Transporters' traditional metering Licence obligations after 31<sup>st</sup> December 2025.

While we endorse the principle of transitioning to a voluntary market arrangement for 2026, it should be noted that currently, Cadent does not receive nor fulfil Meter Provider of Last Resort (MPoLR) requests from Suppliers. As such, we will not be seeking to enter into the proposed voluntary arrangements.

Further comments and general feedback are provided in the annex below.

Kind regards

**Claire McMurphy**  
Regulatory Reporting Business Partner



**Question 1a. Do you agree with the proposed voluntary commitments set out in paragraph 2.2?**

We support the principle of drawing an end to the extension of historic MPoLR arrangements between Transporters and Suppliers, whilst allowing the flexibility for willing parties to enter into voluntary relationships beyond 31<sup>st</sup> December 2025. Additionally, the suggested service levels that seek to replicate the current Licence obligations appear sensible, due to their proposed protection of vulnerable consumers and promotion of transparent and efficient pricing.

It should be noted that Cadent does not receive nor fulfil MPoLR requests and as such, will not be seeking to enter into the proposed voluntary arrangements.

**Question 1b. Do you agree that this agreement will provide consistency over the 12 months it is in place until 31 December 2025?**

Competition in metering services is now more prevalent compared to the market conditions at the point that MPoLR obligations were introduced. Therefore, whilst the voluntary arrangements will allow for consistency over the next twelve-months, we would expect them to be used by Transporters in limited cases and not by Cadent.

**Question 2. Do you agree with and propose to uphold the principles of the voluntary agreement set out above in paragraph 2.2 while continuing to offer traditional metering services from 1 January 2026 until 31 December 2026?**

Agree – see answers to Questions 1a and 1b above.

**Question 3. Do you agree with our proposal to remove the additional licence conditions set out below from NGT's Gas Transporter Licence Standard Special Conditions Section B?**

This question explicitly relates to relevant conditions within National Gas Transmission's Licence; however, our interpretation is that Ofgem are also seeking stakeholder feedback on the proposed changes to conditions within Gas Distribution Networks' (GDNs) Licences.

The consultation's appendices include reference to Standard Special Conditions D17 and D18 as well as Special Condition 9.10. We agree with the proposals to remove these conditions in full from the GDN Licence. However, we also think consideration needs to be given to other Standard Special Conditions that make reference to GDN licensees undertaking traditional metering activities – these include Standard Special Conditions D13, D14, D16, and D19.