

**Smell gas?**

Call the National Gas Emergency Service  
on 0800 111 999

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21 November 2025

Dear Shaun,

**Consultation Response: Gas Transporter Traditional Metering Obligations Post-2025**

Thank you for the opportunity to respond to the above noted consultation. As a Gas Transporter that does not provide metering services, Northern Gas Networks (NGN) welcome Ofgem's proposals for the future of traditional metering obligations. We support the transition to a voluntary market arrangement and the removal of regulated obligations, recognising the evolution of the market and the increasing prevalence of smart metering.

However, we wish to emphasise the following points for clarity and effective implementation:

Where a supplier contacts a Gas Transporter without metering capability, there should be no expectation, regulatory or contractual, for the transporter to provide or facilitate metering services.

The final licence drafting must make it explicit that Gas Transporters who do not currently provide metering services are under no obligation to offer such services if approached by a supplier. This is essential to avoid any ambiguity or unintended regulatory expectations.

Clear licence wording will help ensure all market participants understand their roles, prevent confusion, and support fair operation. It will also protect non-metering transporters from being drawn into activities outside their scope.

We appreciate Ofgem's recognition of this issue in the consultation document and urge that the final licence modifications reflect this position unambiguously. Doing so will support a smooth transition, uphold market integrity, and ensure that obligations are only placed on those entities equipped and willing to fulfil them.

Yours sincerely,



Tracey Saunders  
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**we are  
the network**

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