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Ash Wise
Office of Gas and Electricity Markets
10 South Colonnade
London, E14 4PU

Cadent
Your Gas Network

Consultation – Notice of intent to modify identified Gas Transporter Licences to include Standard Special Condition 1 (SPC1) and the new Standard Special Condition 2 (SPC2).

We welcome the opportunity to respond to Ofgem's notice of intent and support the proposed introduction of SPC1 and SPC2 into the identified Gas Transporter licences.

The Independent Gas Transporter (IGT) sector now serves more than three million customers. Given the scale of the sector, we believe it is important that Ofgem has an appropriate level of oversight of the services customers receive and the performance of the networks serving them.

We therefore support the introduction of SPC2 and the establishment of an IGT Regulatory Instructions and Guidance (RIGs) framework. This should provide Ofgem with more consistent, reliable and appropriately assured information to support effective oversight of the sector.

Looking ahead, we believe the regulatory framework should support two key objectives:

- **Greater consistency in the services and outcomes experienced by gas customers,** irrespective of whether they are served by a Gas Distribution Network (GDN) or an IGT; and
- **Greater consistency in the information available to Ofgem on network performance**, where appropriate and proportionate, supporting effective regulatory oversight across both GDNs and IGTs.

As the IGT reporting framework develops, we would encourage Ofgem to maintain a proportionate approach, ensuring requirements reflect the nature and scale of the sector while providing the quality and consistency of information needed for effective oversight.

For these reasons, we support Ofgem's proposed introduction of SPC1 and SPC2 into the identified Gas Transporter licences.

Yours sincerely

Claire McMurchy
Regulatory Reporting Business Partner