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26th April 2012

Dear Colin,

National Grid Gas response to Transfer of 'Meter Asset Manager' approval role: Statutory consultation on modifications to the gas supply licence and gas transporters licence

Thank you for the opportunity to respond to the above Statutory Consultation.

National Grid Gas (Distribution) (NGD) has reviewed Ofgem's letter of 29 March 2012 and the relevant Licence drafting and subject to the points set out below believes that the suggested amendments to the Transporter Licence achieve the intended purpose, being the transfer of responsibility for approving Meter Asset Managers from Ofgem to become a function under the Supply Point Administration Agreement (SPAA).

We have the following comments pertinent to each Licence:

Gas Transporter Licence:

- We note that in line with the comment contained in NGD's response of ddmmyy, the drafting now includes amendments to Standard Special Condition A10 as well as Standard Condition 8.
- Also in line with our earlier response, the definition of "meter related services" under SSC A10 now references the Network Code as at 12 July 2004 (as per the existing wording in the Licence) although as noted below this is inconsistent with the drafting in the Supplier Licence.
- Section 1A of both SC8 and SSCA10 now refer to persons and undertakings approved by SPAA as a MAM. Undertaking can be interpreted as including a partnership so this amendment addresses the comment that was raised on this point.
- Although Ofgem has incorporated amendments to recognise that the SPAA is an agreement (not a "person") and therefore is unable to approve a person/entity as a MAM we would suggest a minor change to the definition of "approved in accordance with the Supply Point Administration Agreement" in section 1A(i) of both SC8 and SSC A10 as follows:
 - (i) **"approved in accordance with the Supply Point Administration Agreement"** means approved ~~by it~~ in accordance with it for the purposes of this condition generally and **"staff"** includes officers, servants and agents; and"

- Neither SC8 nor SSC A10 contains a definition of Supply Point Administration Agreement. Therefore in SSC A10 (and the equivalent provision in SC8) we suggest deletion of the word "and" at the end of section 1A(i), and after section 1A(ii) insert the following text:

"and (iii) **"Supply Point Administration Agreement"** means the agreement to which the licensee shall be a party and with which it shall comply in accordance with standard condition 14 (The Supply Point Administration Agreement) of this licence".

Gas Supply Licence:

- We did not submit any suggested changes to the drafting in respect of this in our consultation response and the wording remains in the most part unchanged. However, whilst Ofgem has amended the reference to Network Code as at 1 August 2007 in respect of the definition of meter-related services in the Transporter Licence it has not reflected this in the definition of MAM in the Supplier Licence so to this extent the definitions are not consistent between the two Licences with the Supplier Licence referring to the Network Code as at 1 August 2007 and the Transporter Licence referring to Network Code as at 12 July 2004. However, from our earlier response it appears that the definition of Supply Meter Installation in UNC has not changed since 2004 so this is a consistency rather than a material point.
- We note that Ofgem has reflected our comment that it is not appropriate to refer to MAMs being approved "by" SPAA in the drafting of the Supplier Licence and has amended to refer to MAMs being approved in accordance with SPAA as per the Transporter Licence.

We hope the above information is helpful. If you require any further information please contact me.

Yours sincerely

Chris Warner
Network Code Manager