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Ref: Consultation on Ofgem's proposals for moving to reliable next day switching

Dear Andrew,

Thank you for the opportunity to respond to this consultation, which is made on behalf of National Grid Gas Distribution (NGGD).

We are supportive of Ofgem's objectives of faster Supplier switching which we believe would alleviate some of the difficulties presently experienced by customers. If this can be achieved with the same or better reliability than currently planned then we believe this is an appropriate step to take.

While noting the potential customer benefits of faster switching, as Ofgem will be aware there is a significant industry change programme underway. We believe that it is essential that there is a clear vision concerning the interaction of the proposed changes with existing gas change programmes, being Xoserve FGO review, Smart Metering, Project Nexus and UK-link refresh and how each of these developments support or contribute to the 2018 changes to avoid investments currently being made being stranded or requiring substantial ex post change to meet the new arrangements.

It is not clear from Ofgem's consultation how the role of DCC as an agent of Supplier switching would interact with our agent Xoserve who currently perform central registration services for gas Shippers. Our view is that this would need to be explored and clarified, particularly in the context of the current Xoserve FGO review, Project Nexus and UK-link changes.

We therefore support the need for a Strategic Code Review (SCR) and Target Operating Model (TOM) to be developed which should seek to address the points above as part of the review.

On this occasion we have chosen not to respond to Ofgem's individual consultation questions but would draw attention to the detailed consultation response provided by the Energy Networks Association which we support.

If you would like to discuss any points made within this response, please contact Chris Warner, Network Code Manager on 07778 150668 or at [chris.warner@nationalgrid.com](mailto:chris.warner@nationalgrid.com)

Yours sincerely,

Paul Rogers  
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