

Neil Guha
Costs and Outputs
Ofgem
9 Millbank
London
SW1P 3GE

7th January 2015

Dear Neil,

Consultation on Modifications to Standard Special Condition A55

Thank you for the opportunity to comment on the above consultation.

We consider these modifications are unnecessary and the consequential creation of a “DAG Reporting Year” adds to the fog of regulatory bureaucracy. The logic of why Ofgem wants the report on the completed data assurance work for returns submitted in relation each financial year some 11 months after completion of that year and 7 months after all the data submissions have been made in relation to that year, completely escapes us.

By February each year Ofgem teams will have completed their review and analysis work of the returns, carried out annual company visits, published the annual performance report and completed the annual iteration process. Any questions that arise on assurance with the data submitted may therefore generate supplementary questions which could have been answered by reference to the Network Data Assurance Report (NetDAR). This potentially wastes time for both Ofgem and the network companies.

It also means that any discussions on the past element of the NetDar will be in relation to matters occurring some 12 months prior. Again we believe it is more efficient and effective for both Ofgem and the network companies to have such discussions much closer to real time.

As set out in earlier drafts of the Data Assurance Guidance the submission of two reports one related to completed assurance work and one related to proposed assurance work made much more sense and would make the process more efficient. The submission of the report on the assurance work completed should be shortly after the submission of the annual cost and output report under Standard Special Condition A40. The submission of the report on proposed assurance work should remain in February for the following financial year.

If you wish to discuss any aspect of our response please do not hesitate to give me a ring.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul', written in a cursive style.

Stephen Parker
Regulation Director

Tel 07883 099609
e-mail sparker@northerngas.co.uk