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21st January 2015

Statutory Consultation on Data Assurance Guidance and Proposed Licence Changes

Dear Neill,

Wales & West Utilities Limited (WWU) is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major shippers in the UK. We cover 1/6th of the UK land mass and transport gas to over 2.4 million supply points.

We welcome the opportunity to respond to this consultation on the proposed new data assurance requirements for the network companies and the proposed modification to the gas transporter licence. For the avoidance of doubt, this response can be published in full.

As a general comment, we are concerned that the objectives of the DAG, which we fully support, may not be met with the risk assessment criteria as it stands. There are a number of returns listed within the appendix of relevant returns for GDNs that do not lend themselves to the risk assessment. As a result of this, the assessment of some of the returns or tables within the returns will become subjective and as such there will be inconsistencies across the networks. This is counter to the DAG objective of a consistent approach to data governance.

Specific comments are below; these have been provided in previous correspondence to Ofgem in December 2014.

1. Statutory Consultation Document:

Annex A places WWU and NGN under the Company Group of Cheung Kong Group. Whilst we can appreciate that Ofgem see us as such, Para 4.2 of the DAG itself under Annual Reporting, goes on to state "Where a licensee is part of a larger ownership group comprising a number of regulated network companies, then one report should be submitted per sector.." A straight forward reading of this would require one report covering WWU and NGN. We would suggest that at the least a footnote is required at 4.2 stating that WWU and NGN submit separate reports.

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2. DAG Document:

- a. The contents page has incorrect page numbering, and there are a significant number of other typographical errors within the document; many of these have been highlighted to Ofgem previously and the expectation was that the document would be fully proof read before publication. Some further detailed points are noted below.
- b. 2.9 there should be a reference to footnote 9 in this para
- c. Table 2.2: I4: score of 3 – the reference should be to 12 months; the “12” is in superscript
- d. 3.1 – reference ‘Subject to paragraph 0 below’ ; what is para 0?
- e. 4.2 – see note 1 above
- f. 4.4 – square brackets are in place... ‘For the 2015/2016 reporting year [?]’
- g. Appendix 3; as Annex A includes WWU and NGN as part of CK Group

3. NetDAR –footnote page numbering is incorrect (page 1 of 1; page 2 of 2 etc etc)

Yours sincerely,



Steve Edwards
Head of Regulation
Wales & West Utilities

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