



**By email only**

Rupika Madhura  
Ofgem  
9 Milbank  
London  
SW1P 9GE

26<sup>th</sup> May 2016

Dear Rupika,

**Consultation on proposed modification to Standard Special Condition (SSC) A15 (Agency) of the Gas Transporters (GT) licence and proposed new SSC A15A (Central Data Service Provider)**

RWE npower welcomes the opportunity to respond to Ofgem's Consultation on the proposed modification to Standard Special Condition (SSC) A15 (Agency) of the Gas Transporters (GT) licence and proposed new SSC A15A (Central Data Service Provider). We are supportive of the work and progress made in implementing these changes so far, following Ofgem's review of Xoserve's finance, governance and ownership arrangements in 2011. With this in mind I have set out below our comments and recommendations from our analysis.

We agree with the proposed amendments made to Gas Transporters Licence including the introduction of the new Standard Special Condition A15A (Central Data Service Provider). RWE npower believes that these changes are fundamental to the implementation of the options developed by Ofgem as a result of the review. As indicated in our previous response to the original consultation, this will assist Xoserve as a service provider with providing an efficient and high quality service, responsive to network users' needs, and wider industry change.

Following a recent Ofgem consultation dated 3<sup>rd</sup> May 2016 concerning National Grid's sale of Gas Distribution Network business, we note that Ofgem will be required to ensure that any relevant obligations with regard to Xoserve's Funding Governance and Ownership rests with the new company if the sale is approved and completed. Therefore, certain obligations and licence conditions may need to be amended before their application to any new company that may purchase the network.

For these reasons, RWE npower supports the amendments made to Standard Special Condition A15 (Agency) of the Gas Transporters Licence and the introduction of a new SSC A15A (Central Data Service Provider). We agree that these reflect the proposed changes made to Xoserve's obligations and contracts; corporate governance; CDSP governance; business planning and budget setting; and charging and cost allocation.

If you would like to discuss our response, please contact me.

Your sincerely

A handwritten signature in black ink, appearing to read 'Azeem', with a horizontal line underneath it. The signature is set against a light blue, slightly blurred rectangular background.

Azeem Khan  
Current Industry Developments Analyst  
Regulation

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