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Rebecca Pickett
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28 November 2016

Dear Rebecca,

Statutory consultation under section 23 of the Gas Act 1986 on proposed new Standard Special Condition (SSC) A15A (Central Data Service Provider), proposed modification of SSC A15 (Agency) and other proposed consequential modifications to the Gas Transporter (GT) licence

Thank you for the opportunity to respond to your statutory consultation in relation to the new Standard Special Condition A15A of our gas transporters licence and the proposed modifications to SSC A15.

We consider the statutory consultation, as set out, generally achieves the policy objectives desired by Ofgem and appears to be fit for purpose in that regard.

It is disappointing to note that Ofgem has chosen to reflect only some of the points raised in previous responses to earlier consultations within its statutory consultation document. We would expect more detailed explanation as to why Ofgem has not chosen a particular policy position within its statutory consultation document. We are particularly disappointed that Ofgem has not sufficiently addressed the points we made in our previous response to the earlier consultation in May 2016¹. We see little value in duplicating these points again here, but in our view we have not received a satisfactory response to the previous issues we have raised.

We also note that Xoserve has also provided a response to the statutory consultation on behalf of gas transporters, and we support the points raised in Xoserve's response.

Should you require any further information with regards to our response then please do not hesitate to contact me at paul.mitchell@sgn.co.uk.

Yours sincerely,

Paul Mitchell

¹ https://www.ofgem.gov.uk/system/files/docs/2016/10/sgn_2016-05-26_a15_informal_consultation_response.pdf