

Rebecca Pickett
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28 November 2016

Dear Rebecca,

Re: Statutory Consultation on modification to SSC A15 (Agency) transition to SSC A15A (Central Data Service Provider)

Thank you for the opportunity to respond to your consultation. Northern Gas Networks (NGN) has been actively involved in the changes to both industry arrangements and the proposed Licence changes to transition the management of Xoserve from Transporter Agency to a co-operative model with a Central Data Service Provider.

NGN is supportive of the new Licence condition and agrees that the details will deliver the arrangements proposed under the Funding, Governance and Ownership review. There are two areas that we believe could be better delivered with minor amendment, however, these will not prevent the current progression of the industry changes.

Part B paragraph 7 (b) requires Authority consent for all non-CDSP services. We support this approach as we believe the CDSP should focus predominantly on its core activity. While this will prevent the CDSP from delivering non industry related services without authority NGN believes that this may become overly administrative for small adjunct industry related services and a de-minimis allowance similar to those in the GT licence may be more appropriate.

The current arrangements contained in UNC0565 and the associated DSC do not require a UNC Modification for all charging methodology changes as required in Part B paragraph 9. The current drafting of paragraph 9 requires all changes to be made by UNC modification. NGN supports the proposed licence condition which requires a UNC modification for this type of change. This is also consistent with our own charging methodologies. We believe that this inconsistency can be addressed in the UNC and DSC.

I hope you find these comments useful and please contact me should you require further information.

Yours sincerely,



Joanna Ferguson
Regulation & Industry Codes Manager

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