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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 provide views on the proposed modifications to the Transporters' Licences for the introduction of the new Funding, Governance and Ownership (FGO) arrangements for Xoserve. This letter is written on behalf of National Grid Gas Transmission (NGGT) and may be published by Ofgem.

We have actively supported the development of the FGO programme since its inception, contributing to the successful delivery of the Phase 1 implementation in April this year. This saw a step change to the corporate and industry governance arrangements, allowing Shipper and iGT communities to begin to engage directly with Xoserve.

As we approach the final straight on the journey to the delivery of Phase 2 of the programme, we are satisfied that the proposed Licence changes will facilitate meeting the aims of the programme in terms of providing greater inclusion and transparency and creating the regulatory imperative for relevant parties to engage with the new paradigm.

Within the context of this, we have identified an area which might benefit from review. Whilst it is not material in nature, we feel it might help to provide greater clarity, avoiding the potential need for future regulatory / contractual re-work:

- 1. The new contract between the Central Data Service Provider (CDSP) and its customers.**
Xoserve's legacy Agency Services Agreement contract, defining the commercial relationship between Xoserve and the GTs is being replaced by a new contract which reflects the cross-

industry nature of the commercial arrangements for Xoserve operating as the CDSP. In the Modification Proposal, draft contract, supporting documents, etc. the new contract has been referred to as the "Data Services Contract (DSC)". We note that, in your proposed licence condition text, you have referred to the new contract as the Central Data Services Provider (CDSP) Service Agreement. For the avoidance of confusion, we would suggest that the DSC designation be adopted into SSC A15A.

We hope this feedback has been helpful and facilitates greater clarity as parties from across the industry switch over to the new CDSP arrangements in April 2017. Should you wish to discuss any aspect of this response in further detail, please don't hesitate to contact me.

Yours sincerely,

Seán McGoldrick
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