

Rebecca Pickett  
Senior Policy Analyst, Networks  
Ofgem  
9 Millbank  
SW1P 3GE

Paul Rogers  
Regulatory Frameworks Manager  
Regulation and External Affairs

paul.s.rogers@nationalgrid.com  
Mobile +44 (0)7775 821 840

Dear Rebecca

**Statutory consultation 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 the statutory consultation on the proposed Standard Special Condition A15A (SSpCA15A) and consequential other proposed modifications to the Gas Transporter licence. This response is on behalf of National Grid Gas Distribution Limited (NGGDL) and may be published on the Ofgem website.

In respect of the consequential licence changes, NGGDL agrees with Ofgem's proposals and has not identified any further additional modifications beyond those in the statutory consultation.

In relation to SSpCA15A, NGGDL considers the proposed drafting aligns with the direction that gas transporters, gas shippers and Xoserve have been working to achieve in delivering the Funding, Governance and Ownership (FGO) co-operative model for 1 April 2017. There is one minor drafting amendment that we believe will better align the proposed condition with Ofgem's intentions.

**Part B: Minimum conditions relating to the CDSP – Paragraph 9**

This provision as drafted would mean that all charging methodology changes would need to be instigated through the Uniform Network Code (UNC) modification process. Given that the Data Services Contract (DSC) has been drafted to facilitate such changes through DSC governance under co-operative model arrangements, we suggest paragraph 9 should perhaps accommodate this process.

It is envisaged most changes to the charging methodology will be facilitated through the DSC with agreement between all relevant parties thus avoiding the need for UNC modifications (and Ofgem involvement) for incremental developments. If DSC governance was not appropriate or, a party felt that a UNC modification was required, there would be nothing to prevent this alternative course of action. Modifying paragraph 9 as suggested should enhance flexibility and efficiency in co-operative arrangements without affecting any existing UNC safeguards.

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We trust this response is helpful and should you wish to discuss any matters raised please contact me at your convenience.

Yours sincerely,

Paul Rogers  
*By email*

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