



St Lawrence House  
Station Approach  
Horley  
Surrey  
RH6 9HJ

Rebecca Pickett  
Senior Policy Analyst  
RIO Gas Networks  
Ofgem  
9 Millbank  
London  
SW1P 3GE

By email to: [Rebecca.Pickett@ofgem.gov.uk](mailto:Rebecca.Pickett@ofgem.gov.uk)

22nd March 2017

Dear Rebecca,

**Consultation: Proposed direction pursuant to Special Condition 4C of the distribution licences and Special Condition 11C of the gas transporter licence held by NGG NTS to treat services in relation to the Central Data Service Provider (CDSP) for which gas transporters (GTs) get paid by another party, such as must reads, as Excluded Services**

Thank you for the opportunity to respond to your consultation in relation to the above.

**Under the new FGO arrangements are there any other services apart from must reads in relation to the CDSP for which GTs get paid by another party and as such should be treated as an Excluded Service?**

SGN does not believe that there is any other CDSP service other than must reads that is paid to GTs by another party that should be considered an Excluded Service.

**Do you consider that the draft direction at Annex 1 delivers on the policy intent described in this letter and do you have any comments on the draft direction?**

SGN considers that the draft direction at Annex 1 does deliver on the policy intent described in the letter.

We trust that the above observations are helpful.

Should you require any further information with regards to our response then please do not hesitate to contact me at [david.handley@sgn.co.uk](mailto:david.handley@sgn.co.uk).

Yours sincerely,

David Handley  
**Head of Regulation**