

21 December 2016

Steve Brown
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Dear Steve,

Consultation on relaxing the accuracy requirements of Calorific Value Determining Devices

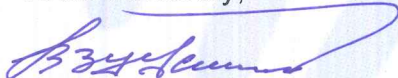
Thank you for this opportunity to respond to this consultation on NGN's proposal in regard to the relaxation of the current accuracy requirements of the Calorific Value Determining Devices (CVDD).

We are pleased that Ofgem has acknowledged, that in the interest of adequate customer protection, gas measurement accuracy requirements should not be an undue impediment to technological, commercial and other innovative developments in the gas industry. A balanced regulatory cost burden of CV measuring equipment is particularly important for small biomethane production facilities.

NGN is fully supportive of the Ofgem's minded-to decision in favour of a relaxation of the current CVDD parameters from 0.14MJ/m³ to 0.2MJ/m³ which may then allow the Gas PT2 to achieve the parameters required for it to be used as a CVDD.

Please do not hesitate to contact Ben Hanley, Lead E&I Integrity Engineer (BFHanley@northerngas.co.uk), or myself if you wish to discuss any aspect of our response.

Yours sincerely,



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