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Dear Sean,

Statutory consultation on a proposal to modify the gas transporter licence following decisions on proposals relating to the implementation of Regulation (EU) 2017/460 (“TAR NC”) in GB

National Grid Gas plc (NGG) welcomes the opportunity to respond to this consultation relating to the implementation of TAR NC in GB.

We refer you to our previous response to your “*Consultation on proposals to implement aspects of Regulation (EU) 2017/460, the European Network Code on harmonised transmission tariff structures for gas (TAR NC)*” of 4 October 2017.

https://www.ofgem.gov.uk/system/files/docs/2017/11/ngg_response.pdf

To reiterate some key points made previously, NGG supports the proposal relating to allocation of tasks. However we believe further consideration should be given to the fact that we are not solely responsible for timescales of certain industry processes.

As you have previously acknowledged, NGG does not have control over the Joint Office of Gas Transporters (JO), who administer the UNC. Their responsibilities include the timetable for how and when the UNC processes are run and ultimately completed for UNC0621, or indeed any UNC change that may be required as part of this Licence change. The timing of these processes may leave NGG at risk of being unable to comply with any proposed Direction based on a start date due to factors out of its control.

We request that consideration is given to focus the direction on the completion date, as opposed to a start date, in order to deliver the required compliance. In this case it would mean issuing a direction that would require compliance, along with completion of all necessary processes and governance so that GB was compliant with the EU Tariff Code, by no later than 31 May 2019.

If you have any questions about this response, please contact Colin Hamilton on 01926 653423.

Yours sincerely

Chris Logue
Gas Markets and Strategic Contracts Manager