

Sean Hayward
Ofgem
9 Millbank
London SW1P 3GE

15 December 2017

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

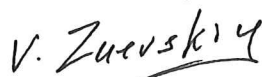
Thank you for the opportunity to comment on the proposal to modify the gas transporter licence in relation to the implementation of the European Network Code on harmonised transmission tariff structures for gas (TAR NC) in Great Britain (GB). Our response is non-confidential.

Northern Gas Networks provided comments to the previous consultation on this subject matter in October 2017. We are pleased that Ofgem has decided to amend the draft text of the Licence change following our feedback. We also note that Ofgem understands our concerns about exposing gas transporters on the distribution network to a Licence condition paragraph which aims to resolve an issue relating to the NTS.

We recognise that Part A of the SSCs of the GT Licence is where charging methodology obligations are situated, but with the proposed Licence change entailing a stand-alone obligation, which relates to National Grid Gas only and is likely to be invoked only once, we remain of the view that the SSCs Part B section of the GT Licence is more appropriate for it.

Please do not hesitate to contact myself (vzuevskiy@northerngas.co.uk) if you wish to discuss any aspect of our response.


Yours sincerely,



Vladislav Zuevskiy
Regulation Policy Manager

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

 1100 Century Way
Thorpe Park Business Park
Colton, Leeds LS15 8TU

 0113 397 5300
 northerngasnetworks.co.uk

**we are
the network**