

Date
22 July 2019

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Rachel Clark
Switching Programme
Ofgem
10 S Colonnade
Canary Wharf
London
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Dear Rachel,

Consultation – Switching Programme and Retail Code Consolidation: Proposed changes to licenses and industry codes

Thank you for the opportunity to respond to Ofgem's consultation: 'Switching Programme and Retail Code Consolidation: Proposed changes to licenses and industry codes'. This response is made on behalf of Cadent and can be published by Ofgem.

Cadent is supportive of Ofgem's approach to the Significant Code Reviews related to bringing about faster, more reliable switching and Retail Code Consolidation. We equally support the vision of a best-in-class industry code which puts consumer outcomes at the heart of everything it does whilst providing market participants with an accessible and comprehensible set of rules that are as easy as possible to understand and comply with.

In particular we welcome the proposals under the Retail Energy Code (REC) Manager functions. We identify 'prioritising and driving change which supports the overall REC strategy and code objectives' as a key component, welcoming its inclusion within scope of what is expected of the procured service provider. We support the proposal for the REC Manager to be accountable to the REC Company (RECCo) Board for the execution of the RECCo Board's strategy and work programme, and subject to the oversight of the PAB (Performance Assurance Board).

With reference to Appendix 5 Consequential Changes to Codes, I am pleased to advise that Cadent has led in delivering the Legal Text for the 'consequential' changes to the Uniform Network Code (UNC) required as part of introduction of the REC. This was achieved by extensive engagement with our external lawyers; Dentons, and with the support of gas transporters, the Central Data Services Provider (CDSP); Xoserve, and the Joint Office of Gas Transporters.

Our responses to the individual questions within the consultation are set out below. We have chosen not to provide responses to questions 4.3 and 4.4 as these are in relation to the Meter Point Administration Service (MPAS), which is an obligation under the Electricity Distribution Licence.

Cadent will be providing a response to the other areas of the consultation in September 2019.

Please contact me should you wish to discuss any aspect of this consultation response.

Yours sincerely,

Guv Dosanjh

Cadent

Industry Codes/ Xoserve Contract Manager

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Continuation sheet

Questions:

Question 1.3: Do you consider that the methodology as set out above is appropriate?

We deem the outlined methodology to be appropriate.

Question 1.4: Do you have any comments on the scope of services?

We broadly agreed with the scope of services, particularly the prioritisation of change which supports the overall strategy. We await the more detailed description of these services and welcome confirmation on when they will be made available.

Question 1.5: Do you agree with our outline proposals on the set-up of the REC Manager?

We agree with the outline proposals on the set-up of the REC Manager in this role, however the reference to a number of functions contracted from one or more service providers must be efficient and economical. We support the proposal for the REC Manager to be accountable to the RECCo Board and subject to the oversight of the PAB, however this should not compromise the ability of industry parties to engage in the process to ensure inclusiveness.

Question 4.3: Which option outlined above do you think is best suited to govern MPAS (as defined above) once the MRA has closed, and why?

We have chosen not to comment on this question as it is essentially an electricity matter.

Question 4.4: Do you have concerns about the suitability of any of the options for the future governance of MPAS, outlined above?

We have chosen not to comment on this question as it is essentially an electricity matter.