

Date

15 February 2019

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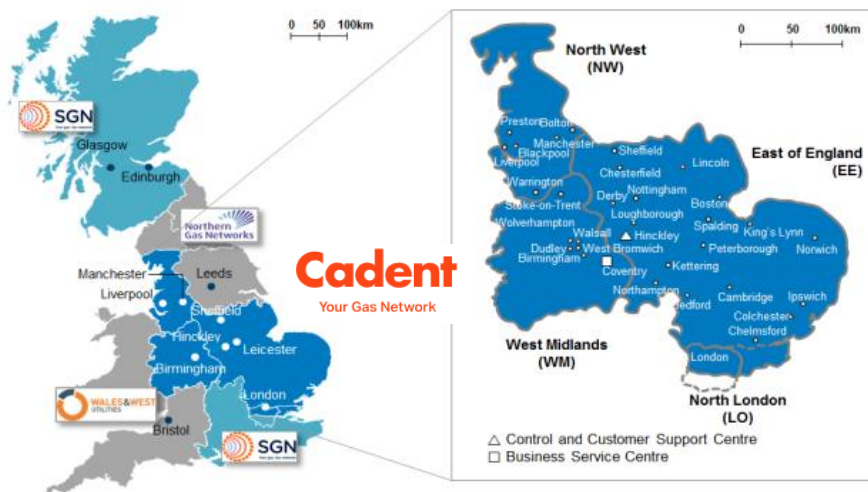


Dear Heather,

Statutory consultation on licence modifications in the event the UK leaves the EU without a deal.

Thank you for the opportunity to respond to Ofgem’s consultation. This response is made on behalf of Cadent Gas Limited (“Cadent”) and can be published by Ofgem.

Cadent owns and operates four gas distribution networks in the UK, providing a safe, reliable and efficient network that transports gas to homes, schools and businesses from the North West to North London and from the Welsh Borders to the East of England. Cadent serves 11million homes and business through 130,000km of pipelines and is the largest gas distribution company in the country.



Cadent has reviewed Ofgem’s proposed licence modification changes and have no objections to them. However, whilst reviewing the proposals and associated documents we have made a couple of observations, highlighted below, that we hope you find useful when finalising the changes.



1. **Reference to National Grid Gas Distribution Limited (NGGDL):**
 - a. In para 2 of Annex 8. EU Exit – Notice of proposed licence modifications to the licence conditions of the Gas Transporter Licence, it references 'National Grid Gas Distribution Limited' (NGGDL) as a licensee in respect of the DN licence. NGGDL was sold in April 2017 and became Cadent Gas Limited ("Cadent") in May 2017. References to NGGDL should be updated to Cadent.

2. **Modifications to SLC 40 (Appointment of Compliance Officer) / SLC40A (Notification of Vertical Integration):**
 - a. In para 1 of Annex 8. EU Exit – Notice of proposed licence modifications to the licence conditions of the Gas Transporter Licence, it references the licence conditions that will be affected and this includes 'SLC 40 (Appointment of Compliance Office)' to which this is only referenced in para 1. Further references in Annex 8 (pages 7-8, 30-31) are in relation to a different licence condition, 'SLC40A (Notification of Vertical Integration)' which we believe is what should be referenced within para 1 instead.

Should you have any questions or wish to discuss this response, please do not hesitate to contact me.

Yours sincerely

Kirsty Scott
Regulatory Frameworks Team, Cadent

By email