

Our Ref – 15/02-C4



15 February 2019

By e-mail to EUExit@ofgem.gov.uk

Dear Cathryn Scott

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

Thank you for the opportunity to participate in this consultation and to comment on the licence modifications required in the event the UK leaves the EU without a deal.

SGN has followed the consultation analysis published throughout 2018 and has reviewed the latest update (14th January 2019) confirming which the licences which will require modification. We are in full agreement and note this will only take place in the eventuality that the UK leaves the EU without a deal. We welcome that the number of changes have been minimised and applied consistently in provisions throughout the licences.

SGN participates in several working groups organised by the Joint Office of Gas Transporters and preparations for Brexit including the requirements in the event the UK were to leave the EU without a deal have been discussed at length by all participants. The minutes of these discussions are available on <http://www.gasgovernance.co.uk/> and the Transmission Work Group in particular has been a useful forum for debate and records the views of SGN and our industry peers.

Over the last decade the UK has become increasingly reliant on gas from Europe and from SGN's perspective the priority to the business is that gas can continue to flow through the interconnects.

We note that the Gas Interconnector Licence will be one of the eight licences that would require modification and acknowledge receipt of annex 6 relating to this licence and have no further comments to the proposed modifications thereof. Similarly, SGN agrees with the modifications proposed to the Gas Supply Licence and the Gas Transporter Licence (annexes 7 and 8)

We hope SGN's feedback is useful to Ofgem as part of the consultation and appreciate continued updates on this key issue.

Yours sincerely

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