

Smell gas?

Call the National Gas Emergency Service
on 0800 111 999

Future System Operation
Office of Gas and Electricity Markets
10 South Colonnade
Canary Wharf
London E14 4PU

FSO@ofgem.gov.uk

28th June 2024

Dear Ofgem

Re: Consultation on Associated Documents to the proposed NESO licences – regulatory framework documents

Thank you for the opportunity to provide representation on the above noted Consultation. As a Gas Transporter, Northern Gas Networks (NGN) do not consider that we are best placed to comment on the electricity impacts, and therefore this response is only from a gas perspective. This response is not considered confidential and may be published in full.

The amended Associated Documents within this consultation do not seem to consider gas to the same degree as electricity. We appreciate that these were originally electricity only documents that are now being updated and this may lead to a natural bias within the wording, however, we would like to see a more 'whole system' approach throughout the revised wording. Therefore whilst we acknowledge that the day one focus will be primarily in relation to electricity, we consider it would be sensible for the documents to still refer to gas throughout. We consider it vital that future consultations include gas planning, in equal measures to electricity planning, to be able to effectively achieve whole system approach and facilitate a cohesive energy industry.

Additionally, clarity is needed on defined terms within these documents, especially in relation to terms that are common across both electricity and gas; for example *energy* and *transmission*. As written, it is not clear as to whether these relate to electricity and gas, or just electricity.

I hope these comments will be of assistance and please contact me on details provided below should you require any further information on this response.

Yours sincerely,



Tracey Saunders (via email)
Northern Gas Networks Ltd
Head of Market Regulation and Compliance
Mobile: 07580 215743



we are
the network

Northern Gas Networks Limited is registered in England and Wales, no. 5167070.
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Part of your monthly gas bill goes towards keeping your gas supply flowing and providing a fast and efficient emergency response service if you smell gas. To find out more visit: northerngasnetworks.co.uk/goodtoknow

For information on how we use your details please visit: northerngasnetworks.co.uk/legal-information

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