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**Review of Gas Transporter traditional metering licence conditions
Modification of Special and Standard Licence Conditions**

Dear Michael,

National Gas Metering (NGM) is a wholly-owned subsidiary of National Gas Transmission (NGT), providing traditional metering services to the traditional Domestic and Industrial & Commercial gas meters owned by NGT. In addition, NGT also carries the National Meter Manager (NMM) obligation for traditional gas meters in the transition to smart metering. National Gas supports the drive to Net Zero, the decarbonisation of the gas network, and the deployment of hydrogen as a future fuel.

NGM provides this consultation response on behalf of NGT.

Proposed licence condition modifications

We agree that the MPoLR and BMPoLR Licence conditions continue to provide beneficial support to energy suppliers' "All Reasonable Steps" obligation during the transition to smart metering. We therefore support the extension proposal and amended end date to NGT's licence conditions SSC B7, SSC B8 and SC 9.16. We note the dependency of SSC B12 to the end date of SSC B7, such that it will also continue to the amended end date.

Next Steps and further consultation

We welcome Ofgem's inclination to disapply the remaining NGT traditional metering licence conditions in due course but accept a further decision on the future of the smart meter roll-out and associated obligations should be made before confirming this. However, given that the smart roll-out end date is now only just over 12 months away, we would urge early consultation and proposals in order to provide early clarity.

We also note responses made by several Distribution networks such that they support retention of SSC D17, SSC D18 and SSC D21. We understand their view but would argue these apply differently to broader Distribution activities than to Transmission activities which have little consumer contact. If the intent is to disapply regulation of traditional metering activities, such that metering services undertaken by any market participant are able to operate within the same constraints, these obligations could be retained only in Distribution licences for the purposes of these broader Distribution activities.



If you have any further questions regarding this consultation response, please contact Abigail Cardall on 07866 840703 or via email at Abigail.Cardall@nationalgas.com.

Yours sincerely,

By email

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