



# NGG plc Compliance Statement

Standard Special Condition A33

V9.0 31 March 2020

# Contents

Introduction	2
Managerial independence of the Transportation Business	2
Operational independence of the Transportation business from its MRSB	3
Branding	3
Use of equipment, facilities, property and personnel employed by the Transportation Business	3
Accommodation	3
Information systems	3
Use of equipment, facilities, property and personnel employed by gas transportation	3
Employee Transfers	3
Compliance Rules	3
Further Information	4
Definitions	4
Version Control	4

## Introduction

This is the Compliance Statement (“Statement”) prepared by National Grid Gas plc (“National Grid Gas”) pursuant to Standard Special Condition A33 (Restriction on use of Information and Independence of the Transportation Business) of its gas transporter (GT) licence. The purpose of this statement is to describe the practices, procedures and systems, which National Grid Gas plc as the holder of the GT licence, has adopted (or intends to adopt) to secure compliance with its obligations under paragraph 2 and paragraph 3 of Standard Special Condition A33 of its GT licence, which, respectively provide how National Grid Gas:

- shall maintain managerial and operational systems which prevent the MRSB (National Grid Metering Ltd) from having access to confidential information other than as permitted by paragraphs 2(a) and 2(b) of Standard Special Condition A33; and
- shall at all times manage and operate the Transportation Business in a way calculated to ensure that it does not restrict, prevent or distort competition in the supply of meter related services or meter reading

(together, “the Conditions”).

As required by paragraph 4 of Standard Special Condition A33, this statement sets out how National Grid Gas shall, save as otherwise excepted by the written consent of the Authority:

1. maintain the full managerial and operational independence of the Transportation Business from the MRSB;
2. maintain the branding of the Transportation Business so that it is fully independent of the branding used by its MRSB;
3. secure that no breach of the requirements of the Conditions occurs as a result of any arrangements for the use of or access to:
  - a. premises or parts of premises occupied by persons engaged in the management or operation of the Transportation Business;
  - b. systems for the recording, processing or storage of data to which persons engaged in, or engaged in respect of, the management or operation of the Transportation Business;
  - c. equipment, facilities or property employed for the management or operation of the Transportation Business; or
  - d. the services of persons who are (whether or not as their principal occupation) engaged in, or in respect of, the management or operation of the Transportation Business; and
4. manage the transfer of employees from the Transportation Business to its MRSB.

National Grid Gas will use its best endeavors to ensure compliance with the terms of this statement. This statement can be amended only with the approval of the Authority.

## Managerial independence of the Transportation Business

Since the implementation of the review of gas metering arrangements “RGMA”, National Grid Gas has adopted and will maintain a separate and independent management structure for the Transportation Business from the management of the MRSB business as described below.

The management of National Grid Metering is separate and independent from the management structure for National Grid Gas’ Transportation Business. Under this structure, the President Distributed Energy and Renewables has full management responsibility for the MRSB. The

President Distributed Energy and Renewables is not a member of the National Grid Gas Board or Gas Transmission Executive Committee and retains full autonomy over the operational activities and management decisions of the MRSB.

The separated MRSB is contracted to the Transportation Business for the delivery of the metering services and meter reading services that the Transportation Business is obliged by the GT Licence and its network code to deliver.

## **Operational independence of the Transportation business from its MRSB**

Effective from RGMA, National Grid Gas has adopted a separate operational structure for the Transportation Business from the operational structure of the MRSB. Save as otherwise excepted by the written consent of the Authority, this will continue.

## **Branding**

Pursuant to the written consent of the Authority, National Grid Gas is relieved of its obligation to implement separate branding for the Transportation Business to the branding used for the MRSB.

## **Use of equipment, facilities, property and personnel employed by the Transportation Business**

### **Accommodation**

Effective from RGMA, National Grid Gas has and will continue to ensure that the Transportation Business is located in separate accommodation to that of the MRSB.

### **Information systems**

Effective from RGMA, National Grid Gas has and will, save as otherwise excepted by the written consent of the Authority, restrict access to Confidential Information about the Transportation Business by ensuring that there is controlled access to information systems by personnel employed by or in respect of the MRSB.

### **Use of equipment, facilities, property and personnel employed by gas transportation**

National Grid Gas will ensure that no breach of the Conditions arises by the Transportation Business through the transparent and cost reflective allocation of charges for any equipment, facilities, property and personnel employed by the Transportation Business that are utilised for the provision of the MRSB.

## **Employee Transfers**

National Grid Gas will manage the transfer of employees from the Transportation Business to ensure that any employee who transfers to the MRSB does not possess Confidential Information that would be commercially valuable to the MRSB that was acquired less than three months before the date of any such transfer.

## **Compliance Rules**

National Grid Gas will adopt Compliance Rules, applicable to the relevant staff and agents of the Transportation Business and any shared business services, giving guidance on disclosure of information about the Transportation Business to the MRSB, save where otherwise permitted by:

- the Authority's consent;
- because it is in the public domain or made available on the same basis to the meter-related services business and/or the meter reading business of any other gas transporter; and/or
- relates to a customer who is at that time a customer of the relevant supplier.

## Further Information

Requests for further information about this statement should be addressed for the attention of the Compliance Officer at:

National Grid Gas plc, Legal Department  
National Grid House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

## Definitions

For the purposes of this statement, the following definitions apply:

<b>Confidential Information</b>	Means information relating to, or derived from, the Transportation Business which is not published or otherwise legitimately in the public domain
<b>Transportation Business</b>	Means the business of National Grid Gas in respect of the National Transmission System (NTS)
<b>MRSB</b>	Means Meter-related services business as defined in Standard Special Condition A33 of the GT licence
<b>GT Licence</b>	Means the gas transporters licence held by National Grid Gas plc in respect of the NTS

## Version Control

Version	Date of Change	Summary of Changes
2	23.11.05	To reflect re-branding of Transco plc to National Grid Gas plc and Transco Metering Services Limited to National Grid Metering Limited
3	13.12.07	To add arrangements for separation from any group trading business
4	03.04.08	To reflect organisational changes
5	08.07.10	Removal of the reference to "Trading Business" to reflect the sale of Fulcrum Pipelines. To reflect that meter reading services have moved to Utility Metering Services Ltd To reflect changes in job title of directors of National Grid Metering and Utility Metering Services
6	21.05.12	Removal of reference to the "Meter Reading Business" to reflect the sale of Utility Metering Services Ltd.
7	03.10.16	Updated to reflect the incorporation of the Backstop Meter Provider of Last Resort (BMPOLR) obligations into the NGG NTS gas transporter licence under Standard Special Conditions B6, B7, B8, B9, B10, B11, and B12
8	12.12.16	Compliance Statement Approved.
9	31.03.2020	Document rebranded to the latest National Grid brand template and updated to reflect the change in job title from Director of National Grid Metering Limited to President Distributed Energy and Renewables. No other changes to text.

**nationalgrid**

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallow's Hill, Warwick.  
CV34 6DA United Kingdom  
Registered in England and Wales  
No. 4031152

**[nationalgrid.com](http://nationalgrid.com)**