

To whom it may concern,

Thank you for the opportunity to respond to the New SEC Content – January 2015 consultation. On behalf of National Grid Gas Distribution I would like to provide the following comments to the questions that have been asked. Where the question has not been listed, National Grid are in support and have no comments to add.

**Question 1 - Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing? Please provide a rationale for your response.**

The legal text states that the DCC should inform industry participants of a revised start date for testing if the secretary of state requests it. We believe that the DCC should inform industry participants of a new start date for testing if it is requested by the secretary of state or not, as such this requirement should be a separate condition rather than added to the existing conditions so that DCC should inform the industry participant either directly or as a result of direct from the secretary of state.

**Question 2 - Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views. a) Whether you agree with the strength of the obligation on DCC to offer the service b) Whether you agree that DCC can determine the detailed rules to apply to use of the service and**

We agree that the DCC should provide the provision for informal testing to users ahead of formal testing because in the new proposed timeline the period of formal testing has been reduced. Therefore this additional informal testing will help to ensure that the systems have been fully tested ahead of go-live and provide a fully reliable service to customers.

**Question 6 - Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?**

Although ordering communications hubs is not a requirement for National Grid, we would be concerned for the programme should a decision for the delay not be made before parliament disbands ahead of the general election. If a decision is not made before parliament disbands, the period of 10 months may not be sufficient for energy suppliers ahead of the DCC go-live.

Regards,

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