



# **Compliance Statement in respect of Standard Special Condition A33 Restriction on Use of certain information and independence of the Transportation Business**

## **Cadent Gas Limited**

Prepared pursuant to paragraph 4 of Standard Special Condition A33 of the gas transporter licence granted to Cadent Gas Limited (registered in England with number 10080864) whose registered office is at Ashbrook Court, Central Boulevard, Prologis Business Park, Coventry, CV7 8PE under section 7 of the Gas Act 1986 which it holds in respect of its UK gas distribution business

**3<sup>rd</sup> February 2020**



## Version Control

Version	Date of change	Summary of changes
0.1	01.10.2016	Draft compliance statement submitted to Ofgem for review and comment
1.0	12.12.2016	Compliance Statement approved
2.0	30.06.2017	Updates made to reflect the new company name and registered address – submitted to Ofgem for approval.
2.0	20.10.2017	Compliance Statement approved
3.0	23.01.20	Updated to remove reference to the Compliance Officer following direction from Ofgem to cease the application of SSC A34 paragraphs 1-8.

## Definitions

For the purposes of this Compliance Statement, the definitions contained within Standard Special Condition A33 (Restriction on Use of Certain Information and Independence of the Transportation Business) apply.

## Introduction

This Compliance Statement has been prepared by Cadent Gas Limited (Cadent) pursuant to Standard Special Condition A33 of its gas transporters licence. The purpose of this Statement is to describe the practices, procedures and systems which Cadent has adopted (or intends to adopt) to secure compliance with Standard Special Condition A33.

In summary, Standard Special Condition A33 requires Cadent to:

- Put in place, and at all times maintain, managerial and operational systems which prevent any relevant supplier, relevant shipper, relevant generator, relevant producer, any trading business, its meter-related services business or its meter reading business from having access to confidential information with the following exceptions:-
  - that such information is made available on an equal basis to any gas or electricity supplier or gas shipper, electricity generator, gas producer or any meter asset manager
  - that such information relates to a customer who at the time to which the information relates was a customer of the relevant supplier or
  - that the Authority otherwise consents in writing
- At all times manage and operate its transportation business in a way calculated to ensure that it does not restrict, prevent or distort competition in the supply of electricity or gas, the shipping of gas, the generation of electricity, the production of gas, any trading business or the supply of meter related services or of meter reading services.

## Managerial and Operational Independence of Cadent

Under the terms of its gas transporter licence, Cadent is required to maintain the full managerial and operational independence of the transportation business from any relevant supplier, relevant shipper, relevant generator, relevant



producer, any trading business, its meter related services business and its meter reading business.

Cadent is a gas transporter and does not own or conduct shipping, electricity generation, supply of gas or electricity or any trading business. Cadent does not have a meter related services business or meter reading business and has no interaction with any relevant supplier, shipper, generator, producer or trading business in the context as defined in Standard Special Condition A33.

Cadent is a separate legal entity with its own Board of Directors, governance and operations. Directors' conflicts of interest must be declared and are monitored by the Company Secretary.

## **Branding**

Under the terms of its gas transporter licence, Cadent is required to maintain the branding of the transportation businesses so that it is fully independent from the branding used by any relevant supplier, relevant shipper, any trading business, its meter-related services business and its meter reading business.

Cadent is a gas transporter and does not own or conduct shipping, electricity generation, supply of gas or electricity or any trading business. Cadent does not have a meter related services business or meter reading business and has no interaction with any relevant supplier, shipper, generator, producer or trading business in the context as defined in Standard Special Condition A33.

## **Arrangements for the use of or access to premises, systems, equipment and services of persons**

Under the terms of its gas transporter licence, Cadent is required to secure that no breach of the requirements of standard special condition A33 occurs as a result of any arrangements for the use of or access to:

- Premises or parts of premises occupied by persons engaged in, or in respect of, the management or operation of the Transportation business;
- 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;
- Equipment, facilities or property employed for the management or operation of the Transportation business; or
- The services of persons who are (whether or not as Secure that no breach of the requirements of standard special condition A33 occurs as a result of any arrangements for the use of or access to:
  - premises or parts of premises occupied by persons engaged in, or in respect of, the management or operation of the transportation business;
  - 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;
  - equipment, facilities or property employed for the management or operation of the transportation business; or
  - 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;

by any relevant supplier, relevant shipper, relevant generator, relevant producer, any trading business, its meter related services business or its meter reading business or by any person engaged in or in respect of the



activities of such a relevant supplier, relevant shipper, relevant generator, relevant producer, any trading business, its meter related services business or its meter reading business.

Cadent is a gas transporter and does not own or conduct shipping, electricity generation, supply of gas or electricity or any trading business. Cadent does not have a meter related services business or meter reading business and has no interaction with any relevant supplier, shipper, generator, producer or trading business in the context as defined in Standard Special Condition A33.

### **Employee Transfers**

Under the terms of its gas transporter licence, Cadent is required to manage the transfer of employees from the transportation business to any relevant shipper, supplier, generator, producer, any trading business, its meter related services business and its meter reading business.

Cadent is a gas transporter and does not own or conduct shipping, electricity generation, supply of gas or electricity or any trading business. Cadent does not have a meter related services business or meter reading business and has no interaction with any relevant supplier, shipper, generator, producer or trading business in the context as defined in Standard Special Condition A33.

### **Code of Conduct**

All Cadent personnel will operate in compliance with a Code of Employee Conduct that sets out clear guidance and instructions in respect of the restriction of use of confidential information and non-discrimination requirements.

The Code is monitored by line managers and breaches will be dealt with under the Cadent disciplinary procedure.

### **Responsibility and Monitoring**

The Cadent Board has overall responsibility for compliance for the provisions of this Statement.

The General Counsel and Regulatory Teams will monitor for any changes to arrangements which may result in creation of any relevant supplier, shipper, generator, producer or trading business in the context as defined in Standard Special Condition A33.

### **Further Information**

Requests for further information about this statement should be addressed for the attention of the Head of Regulation at:

Cadent Gas Limited  
Ashbrook Court  
Prologis Park  
Central Boulevard  
Coventry  
CV7 8PE