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Response to UR Seasonal Factors Consultation for Gas Transmission 2024

John

GMO NI welcomes the opportunity to respond to this Consultation on behalf of the Transmission System Operators of Northern Ireland.

The decision to maintain the current seasonal multiplier factors for Gas Year 24/25 seems reasonable, considering there will be no change within the capacity regime in NI from the current year, or any significant development that may drive a review of the factors. For example, as outlined in the "Consultation on Short Term Exit Capacity for Gas Transmission" published by UR on 31st March 2023, there was a suggestion that if short term exit products are introduced in the future, smoothing of the seasonal factors would reduce any cost allocation shift from the power sector to the distribution sector by the introduction of short term products. GMO NI is looking forward to receiving the decision paper from the consultation and to consider next steps.

On a general point, GMO NI would like to suggest that the seasonal factors consultation is carried out moving forward in advance of the tariff setting process each year to ensure that there is a considered forward outlook approach to enable any proposed updates to the factors being able to be incorporated in the following gas year. As we move through a period of change in terms of the energy transition it is important that meaningful consultations take place to ensure the market and tariffs remain suitable for the NI energy regime.

I would be happy to discuss any aspects of our response.

Yours Sincerely,

A handwritten signature in black ink that reads 'Mark Raphael' in a cursive script.

Mark Raphael
General Manager, GMO NI