

08 October 2024

Veronika Gallagher  
Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

Dear Veronika,

firmus energy welcomes the opportunity to engage in the Utility Regulator's consultation, issued on 10 September 2024, regarding the proposed administrative changes to gas distribution licences.

We confirm our acceptance of all proposed updates to name and address in the licences. We believe these modifications will enhance the accuracy of the licence drafting regarding name and address details.

firmus energy support the proposed update to the definition of the term "Department" in all three distribution licences, changing the reference from "Department of Enterprise, Trade and Investment" to "Department for the Economy." We fully endorse this amendment, as it aligns with current terminology and ensures consistency.

firmus energy acknowledges that the current arrangements for giving notices under the licences are outdated. We therefore support the initiative to streamline the notification process by simplifying the wording to state that notices "shall be given in writing to the relevant party." This change will promote clarity and efficiency in communications, facilitating timely delivery of notices under the licence.

Additionally, we agree with the removal of specific facsimile telephone numbers for the Licensee, the Authority, and the Department, as well as the inclusion of new definitions for Electronic Communication and Public Electronic Communications Network. These updates align with current technological practices and promote smoother exchanges.

We trust that you find these comments useful and if there are any aspects to this response that you would like to discuss further, please do not hesitate to contact me.

Kindest regards,

Siobhán Kane  
Regulatory Affairs Manager