

In regard to the Third Energy Package Consultation on Further Technical Modifications to Gas and Electricity Licences as published on the 19 March 2013, EirGrid recognises the urgent nature of the consultation and welcomes the opportunity to respond to same. This response is not intended as a detailed submission on nor to capture comments on each individual aspect of the consultation.

EirGrid would however like to highlight in general the need for the proposed modifications to respect the generalised industry structures. In this vein, and more particularly in regard to the proposed modifications to the Electricity Distribution Licences, EirGrid welcomes URs clarification (paragraph 3.11), “that NIE does not currently carry out some the activities as noted above [paragraph 3.10]” and that in bringing forward these proposed modifications that UR is endeavouring to “ensure that the requirements of the Directive will be meet should the position change and NIE does carry out or become responsible for carrying out the actives as set out in paragraph 3.10”. None-the-less, in formalising the proposed modifications in licence, one needs to ensure that doing so does not automatically convey the responsibility for actives on the respective licensees contrary to established industry arrangements or the obligations of other licensed parties.

EirGrid is happy to elaborate on our comments above should the Authority feel it would be of benefit.

Best Regards,

Margaret McCarthy  
Group Regulation  
EirGrid