

BGN Comments on NIAUR Draft Forward Work plan

1st April 2011 – 31st March 2012

20th Jan 2011

Introduction

BGN ¹ welcome the opportunity to comment on NIAUR's forward work plan on behalf of BGE(UK) Ltd. BGE(UK) are broadly supportive of the objectives outlined in the Forward Work Plan and are submitting the following comments on some of the areas outlined.

European Legislation

We note one of the key strategic areas (ref. section 1.10) to be progressed over the coming year includes a greater focus on European Legislation with a view to implementing relevant legislation in an expeditious manner.

BGE(UK) have consistently sought to be compliant with the various requirements of EU legislation including Gas regulation EC1775 in a timely manner. We believe that it is of the utmost importance that relevant EU Legislation is implemented, and we welcome the renewed focus on this area. We look forward to working with NIAUR and industry on implementing the existing EU legislation requirements.

As the date approaches for implementation of the 3rd Package, BGE(UK) are keen to ensure compliance with the implementation of the requirements of this new package of legislation. This includes compliance with the new gas regulation EC715 as the requirements of this legislation become due for implementation. You may be aware, we have recently submitted a response to the DETI Consultation on 3rd Package implementation, and look forward to working with you and DETI on this.

Gas Section of the Work plan

With regard to the Gas Section of the Forward Work Plan:

Price Control (ref section 2.23)

We look forward to working with NIAUR on the BGE (UK) price control and will be in correspondence on this shortly.

¹ BGN the Networks division of Bord Gáis Eireann, is submitting this response on behalf of BGE(UK), a conveyance licence holder in NI, and as the service provider to all the TSO's on the island. BGE(UK) a subsidiary of Bord Gais Eireann, were awarded a Conveyance Licence in Northern Ireland in February 2002 for the North-West pipeline (NWP) and South-North Pipeline (SNP). BGE(UK) operates under the trading name BGE(Northern Ireland) or BGE(NI) in Northern Ireland.

Implementing the EU Security of Supply Regulations (ref section 2.26)

We note reference to implementing the EU Security of Supply regulations, while work is underway at a high level, we believe that as this work progresses to the next level of detail, significant input will be required from the designated Competent Authorities, The RA's and the TSO's in the Ireland/UK region to successfully implement the Regulations in a practical and workable manner. We look forward to working with NIAUR, together with the other regional RA's and TSO's on this project.

As you may be aware the Security of Supply Regulations put a direct obligation on TSO's to develop bi-directional capacity at cross border interconnection points.

Harmonising Energy Markets and CAG (ref. section 2.30)

We note the objective to work on some of the elements of CAG in the coming year and we continue to be fully supportive of the RA's agreed objectives on this project.

We look forward to the finalisation of the Forward Work Plan and to working with the Authority and other industry stakeholders on the relevant areas outlined in the plan. Please do not hesitate to revert with any queries or to discuss any of the matters raised above further.