



SGN Natural Gas,
3rd Floor,
83-85 Great Victoria Street,
Belfast,
BT2 7AF

Roisin McLaughlin,
Utility Regulator,
Queens House,
14 Queen Street,
Belfast,
BT1 6ED.

9th April 2018

Dear Roisin,

Enforcement Procedure and Financial Penalties Policy Consultation

SGN Natural Gas welcomes the opportunity to respond to the consultation on enforcement procedure and financial penalties. The documents provide greater clarity around the process. In particular, the annexed flow chart and the enforcement and procedure document, clearly set out the various stages that are necessary in these circumstances.

SGN Natural Gas agree the concept of an alternative resolution is a pragmatic approach to dealing with enforcement and allows for greater engagement between the Utility Regulator and licensee during the process.

The concept of settlement is also a reasonable approach to managing the enforcement procedure. The published documents outline the ability to provide a financial settlement at the appropriate stages in the process, however they do not provide detail on the calculation of settlement amounts. It may be useful to provide a greater level of clarity around this element of the process or perhaps provide an outline of this directly to the licensee involved.

In terms of publication SGN Natural Gas agree this is a suitable approach, however the timeframes outlined to provide a copy of the publication to the licensee seem particularly tight. Where possible it would be beneficial if the Utility Regulator could provide a draft publication to the licensee as soon as possible with the understanding that changes could be made before the final publication.

I trust you find these comments useful.

Yours sincerely

A handwritten signature in black ink that reads "Chris Shine".

Chris Shine
Head of Finance and Regulation
SGN Natural Gas

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