

6 Merrion Square North,  
Dublin  
D02 FF95

**Date 31<sup>st</sup> August 2022**

Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

Sent by email to: [ElecGenLicensing@uregni.gov.uk](mailto:ElecGenLicensing@uregni.gov.uk)

**RE: Proposed modifications to Condition 5 ('Security arrangements') of all electricity generation (including 'DSU generation' licenses)**

Dear Utility Regulator

Thank you for the opportunity to respond to the consultation on the proposed modifications to Condition 5 ('Security arrangements') of all electricity generation that includes a requirement for a specified quantity of secondary fuel to be available to support situations when there may be a risk to security of supply.

While the proposed modification will only apply to thermal generators which (will) have the ability to run on more than one fuel, we note that there are already obligations in respect of minimum fuel stocking levels contained within the Article 39 Consent to construct.

The NI Fuel Security Code has an object of "adequately protecting security of supply of electricity in Northern Ireland" and that was amended in 2013 to also reflect Fuel Switching Agreements to be put in place between SONI and Generators which created contractual obligations on the level of fuel stocks to be held and addressed fuel switches, testing, and stock replenishment.

**A decarbonised future powered by electricity.**

**Electricity Association of Ireland**

Registered Office: 6 Merrion Square North, Dublin 2, D02 FF95  
Registered No.443598 VAT No. IE9682114C  
T +353 1 524 1046 | E [info@eaireland.com](mailto:info@eaireland.com) | [@electricityAI](https://twitter.com/electricityAI)  
[www.eaireland.com](http://www.eaireland.com)

Directors: Ian Luney, John Newman, Ciaran O'Brien,  
Peter O'Shea, Dr John Reilly, Joanne Ross, Marian Troy, Lam Walsh



We believe that there is no requirement for additional explicit licence obligations, particularly as these add a new onerous licence obligation. Such additional obligations can potentially be amended at the Regulator's behest with the only generator recourse to refer the change to the Competitions and Markets Authority.

Given the SEM is one wholesale market, there should not be discrepancies on Generator obligations in the market.

Our preference would be for a more cooperative approach that does not impose any explicit license obligation and is more akin to the NI Fuel Security Code compliance obligation.

If you have any questions or require any additional information, please do not hesitate to contact me

Yours Sincerely

---

Dara Lynott  
CEO  
Electricity Association of Ireland