



Energy for  
generations

# ESB GT's response to the proposed modification to Condition 5 'Security Arrangements' of electricity generation licences

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Email submission to [ElecGenLicensing@uregni.gov.uk](mailto:ElecGenLicensing@uregni.gov.uk)

## 1. Introduction

This submission presents the response by ESB Generation & Trading (ESB GT) to the UR's proposed modification to Condition 5 'Security Arrangements' of electricity generation licences ("Proposed Modification"). The objective of the Proposed Modification is to ensure that plants that can operate on more than one fuel have the required secondary fuel stocks for security of supply reasons.

## 2. Response to the Consultation

It would appear that for generators compliant with the Fuel Switching Agreement, this modification to Condition 5 of the electricity generation licence places the same requirements on generators. Therefore, ESB GT supports the position adopted by the Electricity Association of Ireland on this Proposed Modification, which is that the Northern Ireland Fuel Security Code already has provisions that overlaps with this Proposed Modification and that there is no requirement for these additional explicit licence obligations.

If the Utility Regulator ("the UR") is to progress this modification, ESB GT requests that any submissions made in respect to fulfilling a generator's obligation under the Fuel Switching Agreement will be duly accepted by the UR as compliance with any modification to Condition 5.