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Submitted via e-mail: [Gas\\_networks\\_responses@uregni.gov.uk](mailto:Gas_networks_responses@uregni.gov.uk) with cc to [john.wasson@uregni.gov.uk](mailto:john.wasson@uregni.gov.uk)

9<sup>th</sup> June, 2023

**Re: Consultation on Seasonal Multiplier Factors for Gas Transmission**

Dear John,

Gas Networks Ireland (GNI) welcomes the opportunity to provide feedback on the Utility Regulator's (UR) **Consultation on Seasonal Multiplier Factors for Gas Transmission**.

Having reviewed the consultation, GNI does see the benefit of reviewing the level of seasonal factors and is not opposed in principle to the revised levels being proposed from gas year 24/25, and also the proposal to maintain levels as they currently stand for the 23/24 gas year. As noted in the consultation, UR keeps in regular contact with CRU, particularly in recognition of the policy of all-island alignment, and that the decision in 2015 to align factors was based on the commercial link between the NI and ROI Networks made by the Single Electricity Market (SEM). We believe that this practice of cooperation would also therefore be advantageous in any review of short-term multipliers going forward also.

However, GNI is of the view that whatever revised factors are being approved and implemented, particularly for gas year 24/25, they should only be progressed following consultation with CRU and implemented at the same time as CRU approves/agrees revised factors for ROI in order to continue the alignment of factors as highlighted in the consultation.

Please do not hesitate to contact me if you have any queries.

Yours sincerely,

**Áine Spillane**

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