

GNI (UK)'s submission on the Utility Regulator's Consultation on Proposed Modifications to Gas High Pressure Licenses for Enduring Stranraer Arrangements, Haynestown Enduring Charging Arrangements and Other Minor Amendments

9 December 2024



GNI (UK) Limited (“**GNI (UK)**”) welcomes the opportunity to respond to this consultation and look forward to further engagement with UR in advance of any final decision being published.

Please see GNI (UK)’s response below.

1. Gormanston Interconnection Agreement

GNI (UK) is concerned about the prospect of dual regulation that would result from the Utility Regulator’s (“UR”) proposed introduction of a new Condition 2.4F to GNI (UK)’s licence in Northern Ireland.

GNI (UK) holds licences in Northern Ireland (“**NI**”) and the Republic of Ireland (“**ROI**”). GNI (UK) is subject to the regulatory oversight of UR for its network situated in NI. It is also subject to the regulatory oversight of the Commission for Regulation of Utilities (“**CRU**”) for its network situated in ROI. If UR were to introduce the new Condition 2.4F, GNI (UK) would have obligations under two separate licences to two separate regulatory authorities in respect of the same agreement. This is not a tenable position for GNI (UK).

If UR wishes to progress with making the proposed changes to GNI (UK)’s licence in NI with respect to the Gormanston Interconnection Agreement, it should only do so in coordination with, and with the approval of the CRU.

2. UR’s role in respect of the Interim Arrangements Agreement and Use of System Agreement

The consultation notes (at paragraph 4.8) that GNI (UK)’s NI license, does not set out a role for UR in respect of aspects of the Interim Arrangements Agreement and the Use of System Agreement (both in respect of access to the South Section by GNI (UK)). The consultation suggests UR should have such a role and that it should be reflected in the licence.

The consultation does not propose a licence condition/modification to address this. GNI (UK) would expect a separate consultation to be issued in connection with any proposed changes in this respect. GNI (UK) therefore reserves its position to provide further comment on the suggestion outlined at paragraph 4.8, (pending the issuance of a new consultation document), to include any specific licence modifications proposed by UR.

GNI (UK) would welcome confirmation from UR that it intends to incorporate any such proposed amendments into a separate consultation. GNI (UK) anticipates that engagement with the CRU would be required on this matter also.