

Northern Ireland
Authority for Utility
Regulation

**COMBINED
CONSULTATION ON
LICENCE
MODIFICATION FOR
PROVISION OF
INFORMATION**

Combined Consultation Paper
including Licence Modification Notices
13 May 2025

About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; and Markets and Consumer Protection. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



Abstract

In protecting the short and long-term interests of electricity and gas consumers in Northern Ireland this combined consultation by the Utility Regulator (UR) allows for improved transparency related to removing the restriction around publishing data that was contained in the provision of information (POI) conditions across all referenced licences.

Audience

This licence modification combined consultation paper will be of interest to all electricity and gas licensees. Government departments, organisations representing consumer interests and other stakeholders will also be interested given the potential for greater transparency.

Consumer impact

This licence modification combined consultation will allow us greater freedom to responsibly publish data and information that we deem to be in the public interest.

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1. Executive Summary

- 1.1 The Utility Regulator (UR) is committed to protecting the short - and long-term interests of electricity, gas and water consumers in Northern Ireland. This combined consultation reflects our desire to be a pro-active regulator, as referenced in our Corporate Strategy 2024-2029 (see [here](#)). Being able to responsibly publish additional and relevant advice and information that promotes the interests of consumers improves transparency and also reflects the expectations of consumers.
- 1.2 Consistent with the aims mentioned in the paragraph above we brought forward two consultations which sought to remove a constraint on publication of advice and information. The **first consultation** '[Notice and consultation on licence modification for 'Provision of Information'](#)', related to electricity and gas supply licences only and closed on 18 November 2024. The **second consultation** '[Additional Notice and Consultation on licence modification for Provision of Information \(excluding Supply Licences\)](#)' closed on 7 January 2025 and related to gas conveyance, electricity transmission, distribution, and interconnector licences together with the SEM Operator licence.
- 1.3 The 'Provision of Information to the Authority' licence condition provided that we may not request information from the licence holder for the purposes of publishing the information. This publication exception referred to Article 7 of the Energy Order¹. Article 7 of the Energy Order provides that where it appears to us that the publication of any advice or information would promote the interests of consumers, we may publish that advice and information in such manner as we see fit within the provisions of Article 7(2)².
- 1.4 The licence modification consultations were brought forward to remove the constraints on our ability to obtain information which could potentially promote the interests of consumers if we were to publish that information or advice. The licence modifications also sought to remove inconsistencies in this licence condition in an effort to standardise (as much as possible) this condition across the licences.
- 1.5 In respect of the **first consultation**, seven responses were received. Two respondents offered full support while the others were more cautious in their response and covered issues such as the rationale for the changes, the potential impact on regulatory burden, the remaining protections

¹ Energy (Northern Ireland) Order 2003

² Article 7(2) states "In publishing advice or information under this Article the Authority shall have regard to the need for excluding, so far as that is practicable, any matter which relates to the affairs of a particular individual or body of persons (corporate or unincorporate), where publication of that matter would or might, in the opinion of the Authority, seriously and prejudicially affect the interests of that individual or body."

under Article 7 of the Energy Order and how commercially sensitive information would be treated.

- 1.6 Seven responses were also received to the **second consultation**. All respondents acknowledged the importance of providing transparency to promote consumer interests. Regulatory burden was a key concern raised across many responses followed by concerns associated with the remaining protections under Article 7 of the Energy Order. Respondents were keen for further consultation in advance of information being published.
- 1.7 We have taken respondents' views into account and have decided to have a further combined consultation which seeks to provide (where possible) more information to help alleviate respondents' concerns and expectations. Please see the 'next steps' section for how to respond.
- 1.8 This combined consultation will be consulted upon for 28 days. Subject to any responses received, we will publish our final notice and decision paper as soon as possible with the expectation that licence modifications will take effect 56 days from the date of the final decision paper. We will then update each licence and notify each licensee of their revised licence. We will also update the licences on our website.

2. Background

- 2.1 In fulfilling our statutory duties, we are empowered to request information from licensees under the 'Provision of Information to the Authority' (POI) licence condition. Although this condition is included in all licences, we identified an inconsistency: some licences contain a restriction on the publication of information obtained through this POI licence condition.
- 2.2 We therefore proposed to modify those electricity and gas licences which contain the publication restriction of information obtained under the POI licence condition. These proposals were consulted upon during October 2024 to January 2025 (across two separate consultations).
- 2.3 This combined consultation represents a further consultation on the POI licence modifications. Having listened to respondents' concerns raised, and taken their views into account, we have decided to hold a further consultation combining all relevant affected licences. This combined consultation seeks to provide (where possible) more information to help alleviate respondents' concerns and expectations.
- 2.4 The reasons for and effect of the licence modifications are still consistent with the **first** and **second** consultations however additional information is set out in Section 4 where we consider the feedback from respondents'.
- 2.5 As detailed in Section 5 there are some additional minor modifications proposed since the **first** and **second** consultations. All the proposed modifications associated with the 'provision of information to the authority' licence condition are shown in red text within the appendices to this paper.
- 2.6 This combined consultation and the legal notices appended represent a statutory consultation under Article 14(2) of the Electricity (Northern Ireland) Order 1992 and Article 14(2) of the Gas (Northern Ireland) Order 1996.
- 2.7 The affected licences and summary of the proposed licence modifications are summarised in Section 3 below.

Reasons for the proposed modifications

- 2.8 The current POI licence condition effectively provides that we cannot request information from the licence holder for the purposes of the exercise of our functions under Article 7 of the Energy (Northern Ireland) Order 2003.
- 2.9 Article 7 of the Energy Order provides that where it appears to us that the

publication of any advice and information would promote the interests of consumers, we may publish that advice and information in such manner as we think fit.

- 2.10 The purpose of these proposed licence modifications is to resolve the tension between the POI licence condition and Article 7 of the Energy (Northern Ireland) Order 2003. This licence change will support the maintenance and ongoing development of key publications, such as the Retail Energy Market Monitoring Report (REMM), as well as other reports that provide valuable insights for consumers and stakeholders in the Northern Ireland energy market.
- 2.11 Nonetheless, Article 7 of the Energy (Northern Ireland) Order 2003 already provides appropriate assurances and safeguards to ensure that sensitive information is handled responsibly. Licensees will also be given sufficient opportunity for consultation before any publication.
- 2.12 We consider that this POI licence condition places unnecessary constraints on our ability to obtain information which could potentially promote the interest of consumers if we were to publish that information or advice. There is no good reason or need for having such a constraint on our regulatory role and our ability to publish advice and information which is based on, or is, information that we had obtained from licence holders under or pursuant to the POI licence condition.
- 2.13 Fundamentally, the reason for removing this constraint is that it better facilitates us in carrying out our function to publish advice and information which we consider would promote the interests of consumers in circumstances where we have obtained the relevant information pursuant to requests made under the POI licence condition.
- 2.14 Removal of the constraint is also consistent with our aim of being a pro-active regulator as set out in our Corporate Strategy 2024-2029. Allowing us to responsibly publish additional and relevant advice and information that promotes the interests of consumers improves transparency and reflects the expectations of stakeholders.
- 2.15 It is important to note that the removal of the referred constraint does not mean that we will be able to publish, under Article 7 of the Energy Order, all and any information we obtain pursuant to the POI licence condition. In this regard it is appropriate to note that:
 - (a) Article 7(1) of the Energy Order requires that the publication of advice or information must be to promote the interests of consumers,
 - (b) Article 7(2) places certain constraints on us in terms of excluding publication of any matter which relates to a particular individual, a

company or organisation where publication of that matter would in our opinion seriously and prejudicially affect the interests of that person, company or organisation, and

(c) Article 7(3) requires us to consult with the relevant individual, company or organisation before publishing any advice or information which relates to a particular individual, company or organisation.

2.16 There are, therefore, certain statutory limitations and procedures to follow with regard to the publication of advice and information under Article 7 of the Energy Order.

2.17 There was also some unnecessary inconsistency in the provisions and drafting of the POI licence condition across the various energy licences. Accordingly, a further reason for the proposed modifications is to ensure, to the extent relevant and possible, consistency and clarity in the drafting of the condition across all energy licences.

Effect of the proposed modifications

2.18 The effect of the proposed modifications:

- a) licensees would be obliged to provide information requested (and reasonably required) by us for the purpose of exercising our functions, including the functions conferred upon us under Article 7 of the Energy Order of publishing advice and information which would promote the interests of consumers, and
- b) there would be consistency in terms of licensees' obligations and our approach for all energy licensees.

2.19 We propose to consult for a period of 28 days from the publication date of this combined consultation. Any responses or representations to this consultation will be considered prior to any decision. For details on how to respond to this consultation please see the 'Next Steps' section below.

3. Summary of Original Proposed Licence Modifications

- 3.1 The proposed changes to the electricity and gas licences, within both original consultations, are summarised below. Separate appendices, provided with the consultations, included the legal notices to modify a licence and detailed the licence condition(s) for each type of licence with the proposed modifications shown in red text.

Electricity supply licence modifications

Proposed changes

- 3.2 We proposed to amend Condition 10 'Provision of Information to the Authority' of the electricity supply licences. The affected licences and summary of changes are outlined below:

Affected Licences	Condition 10
EP Ballylumford Limited	<ul style="list-style-type: none"> Remove paragraph 2 referencing Article 7 of Energy Order
Bord Gais Energy Limited	
Budget Energy Limited	
Project Plug Limited t/a Click Energy	<ul style="list-style-type: none"> Update paragraphs 1 and 3 accordingly. This includes the removal of the provision only applying in relation to an enforcement matter from paragraph 3
ESB Independent Energy (NI) Ltd t/a Electric Ireland	
Electricity Supply Board (ESB)	
ElectroRoute Energy Supply NI Limited	
Energia Customer Solutions NI Limited	
Firmus Energy (Supply) Limited	<ul style="list-style-type: none"> Remove paragraph 5 and add definition of "Information" at the end of the Condition
Flogas Enterprise Solutions Limited	
Gaelectric Green Energy Limited	<ul style="list-style-type: none"> Remove definition of "enforcement matter" as reference removed from paragraph 3
LCC Power Limited t/a Go Power	
LCC Group Limited	
Orsted Onshore Green Energy NI Limited	
Power NI Energy Limited	
Share Energy Trading Limited	
SSE Airtricity Energy Supply (NI) Limited	
Statkraft Markets GmbH	
3T Power Limited	

Gas supply licence modifications

Proposed changes

- 3.3 We proposed to amend Condition 1.2 or 1.3³ 'Provision of Information to the Authority' of the gas supply licences. The affected licences and summary of changes are outlined below:

Affected Licences	Condition 1.2 or 1.3
SSE Airtricity Gas Supply (NI) Limited	<ul style="list-style-type: none"> Update paragraph 1.2.2 (or 1.3.2) to remove reference to Article 7 of Energy Order and Articles 14(1)(a) and Article 27 of the Gas Order Update paragraph 1.2.1 (or 1.3.1) accordingly Remove paragraph 1.2.4 (or 1.3.4) Update paragraph 1.2.5 (or 1.3.5) Add definition of "Information" at end of the Condition
Firmus Energy (Supply) Limited - Ten Towns	
Firmus Energy (Supply) Limited - Greater Belfast Area	
Flogas Enterprise Solutions (UK) Limited	
ESB Independent Energy (NI) Limited t/a Electric Ireland	
LCC Group Limited t/a Go Power	
Flogas Natural Gas Limited	
Energia Customer Solutions NI Limited	
Power NI Energy Limited	
SSE Airtricity Gas Supply (NI) Ltd	
SSE Energy Supply Limited	
Shell Energy Europe Limited	
Energia Customer Solutions Limited	
Bord Gais Energy Ltd	
EP Ballylumford Limited	
British Gas Trading Limited	
Coolkeeragh ESB Limited	
ElectroRoute Energy Trading Limited	
Electricity Supply Board (ESB)	
EP NI Energy Limited	
EP Commodities, a. s.	
Ceres Energy Limited	

³ Appendix B details those licences which have the 'Provision of Information to the Authority' condition as number 1.2 and those licences which have the condition as 1.3.

Gas conveyance licence modifications

Proposed changes

- 3.4 We proposed to amend Condition 1.3 or 1.4⁴ 'Provision of Information to the Authority' of the referenced gas conveyance licences. The affected licences and summary of changes are outlined below:

Affected Licences	Condition 1.3 or 1.4
Phoenix Energy Group Ltd	<ul style="list-style-type: none"> Update paragraph 1.3.2 (or 1.4.2) to remove reference to Article 7 of Energy Order and Articles 14(1)(a) and Article 27 of the Gas Order
Firmus Energy (Distribution) Ltd	
SGN Evolve Network Ltd	
Belfast Gas Transmission Ltd	<ul style="list-style-type: none"> Update paragraph 1.3.1 (or 1.4.1) accordingly Remove paragraph 1.3.4 (or 1.4.4) Update paragraph 1.3.5 (or 1.4.5) Add definition of "Information" at end of the Condition
GNI (UK) Ltd	
Premier Transmission Ltd	
West Transmission Ltd	

⁴ Appendix 1 details those licences which have the 'Provision of Information to the Authority' condition as number 1.3 and those licences which have the condition as 1.4.

Electricity transmission licence modifications-NIE Networks

Proposed changes

- 3.5 We proposed to amend Condition 8 'Provision of Information to the Authority' of the referenced electricity transmission licence. The affected licence and summary of changes are outlined below:

Affected Licence	Condition 8
NIE Networks Ltd Transmission Licence	<ul style="list-style-type: none"> Remove paragraph 6 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 5 Reword paragraph 7 Add new paragraph 7 (updated numbering) consistent with other licences Update definition of "Information"

Electricity distribution licence modifications-NIE Networks

Proposed changes

- 3.6 We proposed to amend Condition 8 'Provision of Information to the Authority' of the referenced electricity distribution licence. The affected licence and summary of changes are outlined below:

Affected Licence	Condition 8
NIE Networks Ltd Distribution Licence	<ul style="list-style-type: none"> Remove paragraph 6 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 5 Reword paragraph 7 Add new paragraph 7 (updated numbering) consistent with other licences Update definition of "Information"

Electricity transmission licence modifications – SONI TSO

Proposed changes

- 3.7 We proposed to amend Condition 7 'Provision of Information to the Authority' of the referenced electricity transmission licence. The affected licence and summary of changes are outlined below:

Affected Licence	Condition 7
SONI Ltd Transmission System Operator (TSO)	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 2 Remove paragraph 5 and replace with new paragraph 2 Add new paragraph 4 (updated numbering) consistent with other licences Update definition of "Information" Remove definition of "enforcement matter"

Electricity SEM operator licence modifications – SONI SEMO

Proposed changes

- 3.8 We proposed to amend Condition 6 ‘Provision of Information to the Authority’ of the referenced electricity SEM operator licence. The affected licence and summary of changes are outlined below:

Affected Licence	Condition 6
SONI Ltd: Single Electricity Market (SEM) Operator Licence	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 2 Remove paragraph 5 and replace with new paragraph 2 Add new paragraph 4 (updated numbering) consistent with other licences Update definition of “Information” Remove definition of “enforcement matter”

Electricity transmission licence modifications – Moyle Interconnector

Proposed changes

- 3.9 We proposed to amend Condition 6 ‘Provision of Information to the Authority’ of the referenced electricity transmission licence. The affected licence and summary of changes are outlined below:

Affected Licence	Condition 6
Moyle Interconnector Transmission Licence	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 3 Remove paragraph 5 and replace with new paragraph 3 Add new paragraph 5 (updated numbering) consistent with other licences Update definition of “Information”

4. Responses

4.1 The **first consultation** related to supply licence modifications and closed on 18 November 2024. Seven responses were received. Below is the list of respondents:

- Budget Energy/Flogas/Flogas Enterprise Solutions (joint response)
- Consumer Council NI (CCNI)
- Electric Ireland
- Energia
- ESB Generation and Trading (ESB GT)
- Firmus energy
- Power NI

4.2 All other relevant energy licences were included in the **second consultation** which closed on 7 January 2025. Seven responses were also received as detailed below:

- Consumer Council NI (CCNI)
- EirGrid
- Evolve
- Firmus energy networks
- Mutual Energy
- Phoenix energy
- SONI

4.3 The key themes within these responses are outlined in the paragraphs below. We also outline how we have considered respondents' representations as we aim to address the concerns raised by providing reassurance and clarity within our responses. We recommend reading the 'Our response' section of the key themes to gain a fuller understanding of our perspective.

Consultation Responses

Rationale

4.4 Power NI/Energia and Budget Energy/Flogas responses stated that they

were unclear as to the UR's rationale for these licence modifications and unsure as to what has changed that these modifications are necessary now.

Our response

- 4.5 Our Board members have been considering the type and level of information we publish and believe that greater information could be published for the purposes of promoting the interests of consumers. This drive to be a more pro-active and transparent regulator has been reinforced in our Corporate Strategy 2024-2029.
- 4.6 This led to a review of associated licence conditions and legislation which identified the Article 7 publication restriction contained within the POI licence condition within some but not all electricity and gas licences. This restriction means that we are unable to consider whether publication of some of the information already being provided to us under the POI licence condition would promote the interests of consumers. Having reviewed standard conditions within supply licences in GB and Ireland it is clear they do not include the publication restraint present in some NI licences.
- 4.7 Furthermore, the review identified inconsistencies with the POI licence condition with some gas and electricity licences containing the publication restriction whilst others did not. These are the drivers underpinning the proposed licence modifications and their timing.

Article 7 Energy Order: publication, protection and consultation concerns

- 4.8 Power NI/Energia, Budget Energy/Flogas, Evolve, Mutual Energy, CCNI, responses recognised that while the publication restriction was proposed to be lifted, this did not mean the UR would be able to publish any information that it receives.
- 4.9 However, Power NI/Energia, firmus energy supply, firmus energy networks and Mutual Energy were of the opinion that Article 7 of the Energy Order offered limited protection, with Power NI/Energia and Mutual Energy noting that the deciding view is that of the UR, including after any consultation with the company in advance of publishing any information.
- 4.10 Firmus energy supply, Budget Energy/Flogas, firmus energy networks, Mutual Energy and Evolve also raised concerns regarding the practicalities of publishing information under Article 7 of the Energy Order and requested further clarity. Suggestions included clarification on Article 7 consultation within the licence and a further consultation on

clear processes associated with a POI request. Some of these respondents requested that the UR only publish information after engaging with the licensee to provide support for the publication including justification of how information will serve energy consumers.

- 4.11 Firmus energy supply believe clarity is needed via a licence modification to ensure the licence requires the UR to clearly state the request for information is intended for publication. Any consultation should clearly set out the publication process and structured timelines in respect of notification and response before publication, allowing the supplier time to raise concerns, challenge and/or verify data. Firmus energy networks suggested the UR clarify publication intentions as part of the initial information request.
- 4.12 Electric Ireland recognised that Article 7 of the Energy Order still provides guidance and governance in relation to the publication of information but did note the need for the UR and suppliers to have a shared understanding of the purpose of the information being sought.
- 4.13 In their responses CCNI considered that the modification changes leave appropriate licence protections in place where publication would “seriously and prejudicially affect their interest” (for individuals, companies or organisations) and requires the UR to consult with suppliers before publishing information obtained through the POI licence condition.

Our response

- 4.14 There are certain parameters which apply in terms of the publication of advice and information pursuant to Article 7 of the Energy Order (NI) 2003⁵.
- 4.15 Article 7 supports the publication of advice and information by us to promote the interests of energy consumers. In doing so Article 7 recognises that we must acknowledge the need for excluding any information associated with a company where, in our opinion, it would or has the potential to seriously and prejudicially affect the interests of that company. Accordingly, any information which would fall into this category (which could include commercially sensitive information) would not be published by us.
- 4.16 Should we wish to publish information relating to a particular company, Article 7 requires us to consult with the company in advance of deciding whether to publish the information or not. The Article 7 consultation process is an important step in advance of deciding whether to publish information. We want to reassure licensees that their views will be

⁵ [The Energy \(Northern Ireland\) Order 2003](#)

considered prior to publishing individual company information or data.

- 4.17 Article 7 clearly outlines the safeguards in setting the balance between publishing relevant consumer information and being responsible in considering that not all information is suitable for publication. We therefore intend to apply a balanced and informed approach. We are acutely aware that not all information is relevant or suitable for publication. We will only publish information which promotes the interests of consumers and which, if it relates to the affairs of any company, would not seriously or prejudicially affect the interests of that company. For this reason, we do not consider it necessary to carry out further licence modifications around clarification that information obtained via a request is intended for publication.
- 4.18 Some respondents were uncertain as to the process we would follow, in practical terms, should a POI request be raised with the intent of publishing the resulting data. Taking these comments on board it is good practice and reasonable for us to take the following aspects into consideration in advance of issuing a POI request and to liaise with licensees so that a shared understanding exists in relation to the information request:
- Nature, complexity and level of detail of request
 - Timelines for response, including consideration of holiday periods
 - Other regulatory requirements on licensee(s) at that time e.g. price control process
 - Whether the information is intended for publication, at company level or be aggregated
 - Whether consultation is necessary with an individual licensee or a group of licensees.
- 4.19 We are actively considering centralising the majority of data requests (with the exception e.g. of price control data) to limit the risk of different teams applying different approaches with the same group of licensees e.g. suppliers. This would provide consistency in approach and provide a single point of contact for data requests.
- 4.20 Depending on the type of information requested within any future POI request, there may be a need for us to consult, as required under Article 7 of the Energy Order, before publishing information relating to a particular licensee. Such consultation may either be a formal consultation or take the form of a letter and meeting with an individual company. The type of consultation engagement will depend on the information being sought

and the information to be published.

- 4.21 In addition, the established fora of ERIG⁶ and GMOG⁷ provide suitable platforms we can utilise for licensee engagement. This could include giving advance notice of information requests and changes being considered and an opportunity to explain how certain information may be presented and published in the future.

Regulatory burden concerns

- 4.22 Power NI/Energia, Budget Energy/Flogas, firmus energy supply, ESB GT, Phoenix Energy, firmus energy networks, SONI and Mutual Energy all raised concerns in relation to the nature, volume and complexity of the information that may be requested (particularly in the absence of examples) and the time, resources and format required to respond.
- 4.23 Concerns were also raised regarding the associated timelines that would be placed on such requests. There were concerns that these proposed licence modifications will increase regulatory burden while other respondents noted it was difficult to consider the full implications if this modification were to proceed.
- 4.24 Requests were also made for flexible response timelines, with some requesting mutually agreed timeframes to be established to account for the level of detail of information being requested and the licensee's capacity to respond. Internal coordination between UR directorates was also requested so POI requests were coordinated, reasonable and proportionate to the information requested.
- 4.25 EirGrid were concerned that the modifications lead to uncertainty as to the bounds of the information provision but also lead to the potential for a significant over-reach of information gathering, particularly into the EirGrid plc business.
- 4.26 Both firmus energy supply and network responses referred to an approach the Department for Economy (DfE) proposed with the UR in a recent consultation⁸, as being transferrable to this consultation between ourselves and licensees. The DfE consultation allowed for times when the UR may be unable to meet requests from the Department due to insufficient resources to practically meet the demands of the Department.
- 4.27 SONI also referred to the recent DfE consultation 'Utility Regulator

⁶ Electricity Retail Industry Group

⁷ Gas Market Operating Group

⁸ Section 2.3 <https://www.economy-ni.gov.uk/consultations/utility-regulator-support-decarbonisation-preparation-bill>

(Support for Decarbonisation Preparation) Bill. SONI anticipate that we will look to seek data, forecasts or modelling from SONI in connection with DfE's decarbonisation strategy. If pre-existing information is not available or where significant work is required, SONI anticipate that we will allow SONI to recover the costs of providing this information.

Our response

- 4.28 We understand the concerns raised by a number of respondents in relation to uncertainty of future POI requests and the type of information which may be sought going forward. In anticipation of this response, the first paragraph, within the licence condition, had been redrafted to propose wording to include a reasonableness test, which does not currently exist in this licence condition. The proposed wording was as follows:

*"The Licensee shall, after receiving a request from the Authority for Information that the Authority may **reasonably** require...." [emphasis added]*

- 4.29 This means we must consider the nature, proportionality, complexity, and granularity of information along with the corresponding timelines of the request.
- 4.30 The inclusion of a reasonableness test within the licence condition should give licensees reassurance around any potential over-reach of information, as expressed by EirGrid.
- 4.31 We note the approach taken in the recent DfE consultation, raised by both firmus energy networks and supply businesses in their responses, but do not consider such an approach necessary at this time, particularly given the explicit provision that the information must be reasonably required by us.
- 4.32 SONI raised a specific issue of cost recovery associated with a Bill being advanced by DfE. The purpose of these POI consultations was to remove the publishing restriction within the existing POI licence condition and to ensure consistency across the energy licences. The legislation referred to by SONI is currently in draft and therefore we do not envisage any work for SONI at this point. It is recommended that SONI direct their concerns to the Department if they have not already done so. We published our final approach decision for the SONI Price Control 2026-31⁹ in May 2024 and it is clear that finances associated with decarbonisation were raised with a request on SONI to publish as much of their business plan as feasible in order to facilitate transparency of the process.

⁹ [2024-05-31 = SRP26 Approach Decision.pdf](#)

- 4.33 No specific examples of the type of information to be published were provided as the consultation extends to our organisation as a whole and not one or two specific areas. Whilst we don't have plans to publish additional information imminently, licensees will be aware that, the Markets (retail and wholesale), Consumer Protection and Enforcement teams, Network teams and Price Control teams are constantly reviewing their work areas and they may consider that publishing certain information would promote the interest of consumers and this modification is an important step in facilitating this.
- 4.34 Some broad examples of where we may seek to publish information in the future are:
- State of the market analysis;
 - Monitoring metrics;
 - Retail Energy Market Monitoring (REMM) indicators; and
 - Performance indicators.
- 4.35 We currently receive a large volume of data and, being mindful of the risk of more regulatory burden, we have carried out a review of these requests and are actively considering measures to streamline the requests and submissions. We will engage and consult with suppliers and other data providers in advance of implementing any changes and understand that sufficient time will be required by the data providers to implement any changes.

Commercially sensitive information

- 4.36 Budget Energy/Flogas, firmus energy supply, ESB GT, firmus energy networks and Mutual Energy all raised concerns that with the removal of publication restrictions, there is an increased risk of commercially sensitive data being compromised with unintended consequences.
- 4.37 Mutual Energy were concerned that the UR has the ultimate discretion as to whether the material is published, regardless of any licensee concerns. They urged us to not disregard the licensee's detailed understanding of their own interests and their commercial arrangements with third parties. They also suggested this could result in a reluctance to provide information as the licensee loses control in relation to publication.
- 4.38 ESB GT referred to the risk that commercially sensitive information may be released because of a Freedom of Information request from a competitor.
- 4.39 Power NI urged that we take cognisance of Power NI's position in the

market and the commercial impact that the publication of certain information may have.

- 4.40 Each of these respondents sought reassurances/clarity from us that appropriate safeguards would be in place for commercially sensitive information provided to us if the publication restriction is to be removed.

Our response

- 4.41 As already mentioned above we are acutely aware that not all information is relevant or suitable for publication. Having carried out any necessary consultation with licensees, we will only publish information which promotes the interests of consumers and which, if it relates to the affairs of any company, would not seriously or prejudicially affect the interests of that company.

- 4.42 The Freedom of Information legislation provides for a number of exemptions which include commercial interest and the risk that information may prejudice the commercial interests of a person including a company. We want to reassure licensees that where we receive a request for information from a third party, including under the FOI Act, we have mechanisms in place to enable us to consider fully whether or not an exemption applies to disclosure of the requested information.

Proposed licence modification drafting comments

- 4.43 Specific reference was made by Power NI/Energia, Budget Energy/Flogas and EirGrid to proposed wording in the consultations.
- 4.44 Power NI suggested that the definition of information be amended, in line with the obligation imposed on GB suppliers, to include the following:
- “Information means information (other than information subject to legal privilege) in any form or medium and of any description specified by the Authority.....”
- 4.45 Budget Energy/Flogas response stated that the definition of information should be explicitly confined to data directly related to the licensee’s operations and excludes information owned by third parties such as the network company, as licensees cannot stand over data held by third parties.
- 4.46 Furthermore, the Budget Energy/Flogas response contained concerns that additional wording changes unrelated to Article 7 may increase potential regulatory and operational risks for suppliers and recommended that we limit changes strictly to those necessary for alignment with Article 7.

- 4.47 EirGrid were concerned that proposed modifications broaden our rights under the POI condition significantly, so much so that information that may be requested by us would no longer be tied to our functions as the regulator. As such, EirGrid proposed the following edits shown in red and stated that if these changes were not made the 'EirGrid plc Undertaking' section within the POI licence condition would need amended to reduce the scope of the information that the Undertaking applies to and to exempt any information associated with EirGrid plc:

"The Licensee shall, after receiving a request from the Authority for Information that the Authority may (i) reasonably require, or (ii) that it considers may be necessary, in either case to enable it to perform any of its functions relating to electricity as conferred, assigned, or transferred to it by or under any legislation, give that Information to the Authority when and in the form requested."

Our response

- 4.48 We are content to incorporate the additional wording "other than information subject to legal privilege" proposed by Power NI which is in line with the definition of 'Information' within GB supply licences.
- 4.49 We acknowledge that only information which is held or otherwise obtainable by the licensee can be provided to us. Accordingly, it is possible that a network company holding information about an energy supplier may be required, pursuant to a POI request by us, to provide that information. The opposite also applies. However, as discussed earlier, there are certain constraints on us with regard to the publication of information which relates to the affairs of any particular individual or licensee. Furthermore, where we receive information from a licensee which relates to the affairs of another licensee, we will not publish that information without first having engaged with that other licensee.
- 4.50 Information and data provided by network companies and suppliers, as part of the REMM, is provided within an annual assurance framework which requires network companies and suppliers to provide a statement which guarantees that the 'processes and systems are in place to produce high quality and accurate data on a quarterly basis for the coming year'. We are considering extending this approach to relate to data requests beyond REMM and will of course engage with licensees on this possible approach in the coming months.
- 4.51 It is our view that the revised proposed drafting of the first paragraph of the POI licence condition does not broaden our rights such that the information that may be requested by us would no longer be tied to our functions. The drafting provides for us to make requests which we reasonably require or which we consider is necessary to enable us to

perform our functions. In either case it is linked to the performance of our functions. Furthermore, we see no reason to amend the EirGrid undertaking provisions as there is no intent to broaden our rights.

- 4.52 Some minor drafting changes have been made, following consultation, to the licence condition for the purposes of clarity and to aid understanding. These minor changes do not change the substance of the requirement. The modifications contained in this decision will ensure consistency, to the extent relevant and possible, across all the relevant energy licences. These minor changes are detailed at the start of Section 5 below.

Additional consultation request

- 4.53 Budget Energy/Flogas have also raised a number of concerns with the transparency of the consultation and requested a second consultation that clearly addresses the concerns raised.

Our response

- 4.54 We understand the concerns raised in their response, some of these were raised by other respondents. Given this request and other respondents requesting further clarity we have decided to consult further with this combined consultation. This allows us to provide more detail on our intentions regarding future POI requests and the possible publication of information which may be in the public interest. Please see the 'next steps' section on how to respond to this combined consultation in relation to the POI licence condition.

Standardisation of POI licence condition

- 4.55 Firmus energy supply, firmus energy networks and both CCNI responses supported our intention to standardise the POI licence condition across all energy licences. CCNI viewed that having consistent obligations is logical and practical for enabling more efficient collection of data from the licensees.
- 4.56 Phoenix Energy, as a gas conveyance licence holder, envisaged that information requested from it under Article 7 of the Energy Order would be limited because Article 7 publication relates to advice and information which promotes the interests of consumers.
- 4.57 Clarification was also sought by Phoenix Energy on modifications to its gas conveyance licence and the removal of two exclusions (Article 14(1)(a) and Article 27) under the Gas Order.

Our response

- 4.58 Having a standardised POI licence condition across all energy licences (as much as possible), is important to ensure a consistent approach is applied to all energy licences and we welcome the support from those respondents who recognised the importance of this.
- 4.59 In order to standardise the POI licence condition, 53 energy licences would require amending. These have been captured across both consultations and this combined consultation and span the following licence types¹⁰:
- Supply licences
 - Gas Conveyance licences
 - Transmission licences
 - Distribution licences
 - SEM Operator licence
- 4.60 As we can see from the CCNI responses¹¹, Ofgem publish data about various parts of the energy sector including about performance. Some charts are broken down by individual supplier, by suppliers of different sizes or by suppliers as a whole. Other charts are broken down by supplier, distribution, transmission and wholesale market. CCNI's response to the second consultation, which excluded supply licences, suggested that providing consumers access to additional information on electricity and gas licensees' performance could encourage improvements in customer service.
- 4.61 The exclusions Phoenix Energy highlighted in its response are currently included in gas conveyance licences and gas supply licences. Their removal is appropriate to ensure consistency in both the approach and obligations across all energy licences. The Article 14(1)(a) exclusion is being removed as it is not reasonable or feasible for there to be an exception such that we cannot request information for the purpose of performing our licence modification functions. Similarly, the Article 27 exclusion is not required given that Article 27 provides for us collecting information and from whom. The deletion of this exclusion would have no substantive effect or impact on the rights of gas licensees and would bring it into line with the POI conditions of other licences.

¹⁰ Licence category reflects the type of licences captured with the Electricity Order 1992 and Gas Order 1996

¹¹ All responses published alongside this decision

Transparency

- 4.62 All respondents recognised our desire for greater transparency. Both CCNI responses viewed the consultations positively and supported us in seeking to provide more transparency and to publish more relevant information that promotes the interests of consumers.
- 4.63 To encourage improvements in customer service CCNI's response, to the supply licence only consultation, suggested the provision of more information on comparative supplier performance and overall supplier performance.
- 4.64 The CCNI responses provided a comparison with Ofgem about different parts of the energy sector, including performance. CCNI notes that Ofgem publishes a much broader range of data (including downloadable spreadsheet data) on its website. CCNI listed examples of Ofgem performance data such as:
- Total fines and redress payments over time;
 - Complaints received by suppliers per customer accounts;
 - Complaints resolved by suppliers; and
 - Gas prepayment customers average weekly debt repayment rates.
 - Network costs
 - Expenditure vs allowance
 - Consumer interruptions and minutes lost
 - Customer satisfaction

Our response

- 4.65 We welcome the acknowledgement of respondents' that in this licence modification we value transparency and seek to improve it. The positive responses from CCNI and their support for the aims of this licence modification and the potential for us to publish more relevant information is welcomed.
- 4.66 CCNI raised interesting suggestions both in terms of provision of information on overall supplier performance and more comparative supplier performance analysis. In addition, the comparison with Ofgem and the examples of Ofgem performance data chosen by CCNI were helpful.
- 4.67 While there are no plans to publish more comparative performance data, care would be needed if we were to explore this further, particularly from

the perspective of the type and granularity of data e.g. at individual supplier level, by size range or by suppliers as a whole. Appropriate engagement with licensees and data providers would also be necessary.

5. Licence Modification for this Combined Consultation

Proposed combined changes across all relevant licences

- 5.1 The proposed combined modifications reflect those consulted upon with the inclusion of three minor additional changes which we detail now.
- 5.2 In relation to the definition of 'Information', proposed changes to the definition were consulted upon and one respondent requested that additional wording be added to the definition, consistent with the definition of 'Information' within GB supply licences. We have taken this recommendation on board and, subject to this further consultation, intend making the additional amendment shown in red below:
- 5.3 **"Information** means information (other than information subject to legal privilege) in any form or medium and of any description specified by the Authority and includes any documents, accounts, estimates, returns, records or reports and data of any kind (whether or not prepared specifically at the request of the Authority)."
- 5.4 The second minor change has been made following the **first consultation** for the purposes of clarity and to aid understanding. The change is simply to change "call for" to "request" in two places within the licence condition. As this change was captured within the **second consultation** this additional proposed minor change is additional to those supply licences captured in the **first consultation**. These minor changes do not change the substance of the requirement.
- 5.5 The third minor change follows our additional review and provides more clarity. Subject to this combined consultation, we intend to add the following wording shown in red below:
- 5.6 "The Licensee shall, after receiving a request from the Authority for reasoned comments on the accuracy and text of any Information (including that which has been provided by the Licensee in accordance with paragraph 1) relating to the Licensee's activities under or pursuant to this Licence which the Authority proposes to publish under Article 7 of the Energy Order, give such comments to the Authority when and in the form requested."

Electricity supply licence modifications

Proposed combined changes

- 5.7 We propose to amend Condition 10 'Provision of Information to the Authority' of the electricity supply licences in line with those modifications proposed in our first consultation paper and including the three minor additional changes mentioned at the start of this section.
- 5.8 The affected licences and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix A.

Affected Licences	Condition 10
EP Ballylumford Limited	<ul style="list-style-type: none"> Remove paragraph 2 referencing Article 7 of Energy Order Update paragraphs 1 and 3 accordingly. This includes the removal of the provision only applying in relation to an enforcement matter from paragraph 3. Remove paragraph 5 and add definition of "Information" at the end of the Condition. Add following wording to definition "... (other than information subject to legal privilege)...." Old paragraph 5 renumbered 4 and text updated regarding reasoned comments on the accuracy and text of any Information. Minor revision to wording in new paragraph 3 to replace "call for" with "request". Remove definition of "enforcement matter" as reference removed from paragraph 3
Bord Gais Energy Limited	
Budget Energy Limited	
Project Plug Limited t/a Click Energy	
ESB Independent Energy (NI) Ltd t/a Electric Ireland	
Electricity Supply Board (ESB)	
ElectroRoute Energy Supply NI Limited	
Energia Customer Solutions NI Limited	
Firmus Energy (Supply) Limited	
Flogas Enterprise Solutions Limited	
Gaelectric Green Energy Limited	
LCC Power Limited t/a Go Power	
LCC Group Limited	
Orsted Onshore Green Energy NI Limited	
Power NI Energy Limited	
Share Energy Trading Limited	
SSE Airtricity Energy Supply (NI) Limited	
Statkraft Markets GmbH	
Erova Energy Ltd	
3T Power Limited	

- 5.9 The reasons and effect of these modifications are set out in section 2 of this paper.

Gas supply licence modifications

Proposed combined changes

- 5.10 We propose to amend Condition 1.2 or 1.3¹² 'Provision of Information to the Authority' of the gas supply licences in line with those modifications proposed in the first consultation paper and including the three minor additional changes mentioned at the start of this section.
- 5.11 The affected licences and summary of proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix B.

¹² Appendix B details those licences which have the 'Provision of Information to the Authority' condition as number 1.2 and those licences which have the condition as 1.3.

Affected Licences	Condition 1.2 or 1.3
SSE Airtricity Gas Supply (NI) Limited	<ul style="list-style-type: none"> Update paragraph 1.2.2 (or 1.3.2) to remove reference to Article 7 of Energy Order and Articles 14(1)(a) and Article 27 of the Gas Order.
Firmus Energy (Supply) Limited - Ten Towns	
Firmus Energy (Supply) Limited - Greater Belfast Area	
Flogas Enterprise Solutions (UK) Limited	
ESB Independent Energy (NI) Limited t/a Electric Ireland	<ul style="list-style-type: none"> Update paragraph 1.2.1 (or 1.3.1) accordingly
LCC Group Limited t/a Go Power	
Flogas Natural Gas Limited	<ul style="list-style-type: none"> Minor revision to wording in new paragraph 1.2.3 (or 1.3.3) to replace “call for” with “request”.
Energia Customer Solutions NI Limited	
Power NI Energy Limited	
SSE Airtricity Gas Supply (NI) Ltd	
SSE Energy Supply Limited	<ul style="list-style-type: none"> Remove paragraph 1.2.4 (or 1.3.4)
Shell Energy Europe Limited	
Energia Customer Solutions Limited	<ul style="list-style-type: none"> Update paragraph 1.2.5 (or 1.3.5)
Bord Gais Energy Ltd	
EP Ballylumford Limited	<ul style="list-style-type: none"> Add definition of “Information” at end of the Condition. Add following wording to definition “...(other than information subject to legal privilege)....”
British Gas Trading Limited	
Coolkeeragh ESB Limited	
ElectroRoute Energy Trading Limited	
Electricity Supply Board (ESB)	
EP NI Energy Limited	
EP Commodities, a. s.	
Ceres Energy Limited	

5.12 The reasons and effect of these modifications are set out in section 2 of this paper.

Gas conveyance licence modifications

Proposed combined changes

- 5.13 We propose to amend Condition 1.3 or 1.4¹³ 'Provision of Information to the Authority' of the gas conveyance licences in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.14 The affected licences and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix C.

Affected Licences	Condition 1.3 or 1.4
Phoenix Energy Group Ltd	<ul style="list-style-type: none"> Update paragraph 1.3.2 (or 1.4.2) to remove reference to Article 7 of Energy Order and Articles 14(1)(a) and Article 27 of the Gas Order Update paragraph 1.3.1 (or 1.4.1) accordingly Remove paragraph 1.3.4 (or 1.4.4) Update paragraph 1.3.5 (or 1.4.5) Add definition of "Information" at end of the Condition. Add following wording to definition "... (other than information subject to legal privilege)...."
Firmus Energy (Distribution) Ltd	
SGN Evolve Network Ltd	
Belfast Gas Transmission Ltd	
GNI (UK) Ltd	
Premier Transmission Ltd	
West Transmission Ltd	

- 5.15 The reasons and effect of these modifications are set out in section 2 of this paper.

¹³ Appendix C details those licences which have the 'Provision of Information to the Authority' condition as number 1.3 and those licences which have the condition as 1.4.

Electricity transmission licence modifications-NIE Networks

Proposed combined changes

- 5.16 We propose to amend Condition 8 'Provision of Information to the Authority' of the referenced electricity transmission licence in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.17 The affected licence and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix D.

Affected Licence	Condition 8
NIE Networks Ltd Transmission Licence	<ul style="list-style-type: none"> Remove paragraph 6 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 5 Reword paragraph 7 Add new paragraph 7 (updated numbering) consistent with other licences Update definition of "Information". Add following wording to definition "... (other than information subject to legal privilege)...."

- 5.18 The reasons and effect of these modifications are set out in section 2 of this paper.

Electricity distribution licence modifications-NIE Networks

Proposed combined changes

- 5.19 We propose to amend Condition 8 'Provision of Information to the Authority' of the referenced electricity distribution licence in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.20 The affected licence and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix E.

Affected Licence	Condition 8
NIE Networks Ltd Distribution Licence	<ul style="list-style-type: none"> Remove paragraph 6 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 5 Reword paragraph 7 Add new paragraph 7 (updated numbering) consistent with other licences Update definition of "Information". Add following wording to definition "... (other than information subject to legal privilege)...."

- 5.21 The reasons and effect of these modifications are set out in section 2 of this paper.

Electricity transmission licence modifications – SONI TSO

Proposed combined changes

- 5.22 We propose to amend Condition 7 ‘Provision of Information to the Authority’ of the referenced electricity transmission licence in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.23 The affected licence and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix F.

Affected Licence	Condition 7
SONI Ltd Transmission System Operator (TSO)	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 2 Remove paragraph 5 and replace with new paragraph 2 Add new paragraph 4 (updated numbering) consistent with other licences Update definition of “Information”. Add following wording to definition “...(other than information subject to legal privilege)....” Remove definition of “enforcement matter”

- 5.24 The reasons and effect of these modifications are set out in section 2 of this paper.

Electricity SEM operator licence modifications – SONI Semo

Proposed combined changes

- 5.25 We propose to amend Condition 6 ‘Provision of Information to the Authority’ of the referenced electricity SEM Operator licence in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.26 The affected licence and summary of the proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix G.

Affected Licence	Condition 6
SONI Ltd: Single Electricity Market (SEM) Operator Licence	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 2 Remove paragraph 5 and replace with new paragraph 2 Add new paragraph 4 (updated numbering) consistent with other licences Update definition of “Information”. Add following wording to definition “...(other than information subject to legal privilege)....” Remove definition of “enforcement matter”

- 5.27 The reasons and effect of these modifications are set out in section 2 of this paper.

Electricity transmission licence modifications – Moyle interconnector

Proposed combined changes

- 5.28 We propose to amend Condition 6 ‘Provision of Information to the Authority’ of the referenced electricity transmission licence in line with those modifications proposed in the second consultation paper and including the minor additional changes mentioned at the start of this section.
- 5.29 The affected licence and summary of proposed combined changes are outlined in the table below. The detailed licence conditions and proposed modifications (shown in red text) are shown in Appendix H.

Affected Licence	Condition 6
Moyle Interconnector Transmission Licence	<ul style="list-style-type: none"> Remove paragraph 4 referencing Article 7 of Energy Order Update paragraph 1 accordingly Remove paragraph 3 Remove paragraph 5 and replace with new paragraph 3 Add new paragraph 5 (updated numbering) consistent with other licences Update definition of “Information”. Add following wording to definition “...(other than information subject to legal privilege)....”

- 5.30 The reasons and effect of these modifications are set out in section 2 of this paper.

6. Next Steps

Combined Consultation

- 6.1 This paper seeks to consult further on modifications to the POI licence condition following consultations held between October 2024 to January 2025.
- 6.2 This combined consultation allows for further consultation in advance of any decisions on the POI licence modifications. We therefore seek stakeholders' views on any aspect of this combined consultation including the licence modifications specified in the appendices.
- 6.3 Responses to this combined consultation should be submitted by **10 June 2025**. Responses should be sent to:
- Karen Shiels and Liz Wilkin
Utility Regulator
Queens House
14 Queen Street
Belfast BT1 6ED
karen.shiels@uregni.gov.uk
liz.wilkin@uregni.gov.uk
- 6.4 Our preference would be for responses to be submitted by e-mail.
- 6.5 Individual respondents may ask for their responses (in whole or in part) not to be published or that their identity should be withheld from public disclosure. Where either of these is the case, we will also ask respondents to supply the redacted version of the response that can be published.
- 6.6 As a public body and non-ministerial government department we are required to comply with the Freedom of Information Act (FOIA). The effect of FOIA may be that certain recorded information contained in consultation responses is required to be put into the public domain.
- 6.7 Note it is now possible that all responses made to consultations will be discoverable under FOIA even if respondents ask us to treat responses as confidential.
- 6.8 It is therefore important that respondents take account of this and if asking us to treat responses as confidential, respondents should specify why they consider the information in question should be treated as such.
- 6.9 This paper is available in alternative formats such as audio, Braille etc. If an

alternative format is required, please contact our office which will be happy to assist.

Timelines

- 6.10 Subject to review and consideration of any responses we will aim to publish a final decision as soon as possible. Licence modifications would become effective 56 days after a final decision is published.

7. Appendices

Appendix Reference	Description
Appendix A	Electricity Suppliers Licence Modification Notice
Appendix B	Gas Suppliers Licence Modification Notice
Appendix C	Gas Conveyance Licence Modification Notice
Appendix D	Electricity Transmission Licence Modification Notice – NIE Networks
Appendix E	Electricity Distribution Licence Modification Notice – NIE Networks
Appendix F	Electricity Transmission Licence Modification Notice – SONI TSO
Appendix G	Electricity Market Operator Licence Modification Notice – SONI MO (SEMO)
Appendix H	Moyle Interconnector Licence Modification Notice