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Response to UR Seasonal Factors Consultation for Gas Transmission 2025

John

GMO NI welcomes the opportunity to respond to this Consultation on behalf of the Transmission System Operators of Northern Ireland.

Generally, GMO NI is in agreement with the proposal to maintain the seasonal factors for the upcoming GY 25/26, which is aligned with factors in ROI however we would urge UR to carry out a more in depth review of both seasonal factors and product multipliers as part of next year's consultation process.

Following the implementation of the current factors, it is clear they can be a source of revenue volatility with swings at year end being mainly driven by short term products utilisation versus forecast. Recent years has shown the swing from positive to negative in the end of year revenue positions, and within the current gas year the first ever mid-year tariff recalculation has taken place, which although exaggerated by an unforeseen event, was mainly as a result of overutilisation of the expensive daily capacity products during a 3-4 month window.

GMO NI would welcome a more comprehensive analysis of these parameters to explore what options are available for updating them to address revenue volatility but also consider in detail the wider interactions with the electricity sector, whilst adhering to requirements under the Tariff NC.

Yours Sincerely,

A handwritten signature in black ink that reads 'Mark Raphael'.

Mark Raphael
General Manager, GMO NI