

From: [REDACTED]

Sent: 05 June 2025 09:56

To: Shiels, Karen <Karen.Shiels@uregni.gov.uk>

Cc: [REDACTED]

[REDACTED]

[REDACTED]

Subject: FW: Utility Regulator - Gas Licence Modification Notice

Dear Karen,

Following GNI (UK) review of the proposed modifications to amend the 'Provision of Information to the Authority' licence condition 1.3, we have no comment in regards sections 1.3.1 to 1.3.4 as they are in line with existing version. The only comment we have is in relation section 1.3.5 Definitions, see comment below.

*The proposed definition of "Information" (at the new 1.3.5) needs to be amended to exclude "(other than information subject to legal privilege)", (the "**legal privilege qualifier**"). The legal privilege qualifier is not necessary as the new proposed 1.3.4 will already allow for a Licensee to refuse to provide the Information if it is subject to legal privilege. The proposed definition of Information is extremely broad but only has a carve out for "information subject to legal privilege". In addition, should the legal privilege qualifier be included in the definition it could undercut the new 1.3.4. As you may be aware, there are numerous other reasons why a party may not be compelled to provide evidence in civil proceedings. The limitation on the obligation to provide information (1.3.4) should be sufficient for a Licensee to refuse to provide Information without the necessity for the legal privilege qualifier in the definition for 'Information'.*

Happy to discuss if you think it would be helpful.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Gas Networks Ireland,
P.O. Box 51, Gasworks Road,
Cork, Ireland. T12 RX96.


