

Phoenix Energy's response to the Utility Regulator's consultation on biomethane modifications to Gas Conveyance Licences

1. Introduction

- 1.1 Phoenix Energy¹ (**Phoenix**) is the owner and operator of the largest gas distribution business in Northern Ireland (**NI**), covering an area that encapsulates c.45% of the population of NI, and serving regions including Greater Belfast, Larne, East Down and Whitehead (the **Licensed Area**).
- 1.2 Phoenix, together with the other NI Gas Network Operators (**GNOs**) – Mutual Energy, GNI(UK), Evolve, and firmus energy – have developed a pathway to decarbonise the NI gas network and are actively preparing for this transition away from natural gas.
- 1.3 At the heart of this pathway is an affordable, least-disruptive, transition to net-zero where consumers can continue to enjoy all the convenience and benefits of gas in the knowledge that the gas they use will be 100% renewable by 2050.
- 1.4 Biomethane provides a key opportunity to use NI's existing gas network to deliver a decarbonised solution to c.550k homes, enabling consumers to continue to enjoy all the flexibility of gas with minimum disruption.
- 1.5 Biomethane also offers a strategic advantage to NI's key industries by giving companies obliged, or seeking, to decarbonise their production with an option that allows them to achieve that aim in a timely manner.
- 1.6 The Utility Regulator (**UR**) recognises the opportunity biomethane presents for NI in its consultation on biomethane modifications to Gas Conveyance Licences (the **consultation**):

We consider decarbonisation of the NI Network, including through biomethane injection, to be well-aligned with our designated regulatory gas objectives [...]. It is also suited to furthering a diverse, viable and environmentally friendly energy supply, all the more as increasing provision of indigenous renewable gas may over time reduce the dependency on gas imports.²

- 1.7 While Phoenix can appreciate UR's need to ensure a robust regulatory framework is in place to underpin the injection of renewable gas, including biomethane:
- Phoenix's licence already recognises the requirement to establish terms for the purposes of introducing gas into the gas network on direction from UR, and

¹ Phoenix Energy Group Ltd is trading as Phoenix Energy

² Paragraph 1.14 of the consultation.

- Phoenix has previously challenged UR on the level of detail it now proposes to include in licences to support this framework.

1.8 Indeed, Phoenix and the other Distribution Network Operators (**DNOs**) have extensively engaged with UR on its proposed approach, including providing UR with appropriate licence text on numerous iterations of licence drafting over the last c.2.5 years.

1.9 Despite seeking regular updates on progress of this licence modification, UR has not engaged with Phoenix over the last c.12 months.

1.10 Phoenix is therefore disappointed that UR did not continue in the spirit of collaboration before presenting its proposals for consultation. The length of the consultation paper is disproportionate to the matter in hand and the level of previous engagement between UR and DNOs. It is however more disappointing that:

- many of the concerns and queries raised by Phoenix have been ignored and the reasons and effects given by UR in the consultation do not address these,
- the consultation has been issued in advance of the findings of two comprehensive workstreams being progressed in 2025:
 - GNOs' production of a detailed, evidenced, written report on the potential options to alleviate network constraints, and
 - DfE's ongoing policy development on the treatment of connection-related costs for biomethane production sites, and
- UR's desire to ensure its communications are easily understood by consumers has not been extended to those tasked with delivering licence compliance. Phoenix understands the need to reflect legislative requirements in the regulatory framework. However, as UR notes in its approach to licence compliance monitoring and reporting:

*"[...] licence compliance is central to ensuring consumer protection and market performance. Compliance must therefore be a central focus of the work of licensees and that focus must run through all levels of the organisation."*³

It is therefore important that all persons tasked with delivering compliance can readily understand the licence conditions under which they operate. Even with the reasons and effects given by UR in the consultation, interpretation of the text used in some of these licence modifications is challenging.

1.11 In looking to future-proof licences, UR is instead establishing principles and developing a complex regulatory framework that will need detailed review and may need reset once NI's biomethane policy is in place.

³ Licence compliance framework for all licensees: New approach to compliance monitoring and reporting, Utility Regulator Instructions and Guidance, September 2024

1.12 It therefore seems premature for UR to seek to modify licences when policymaking and regulatory frameworks have yet to be established for biomethane injection, or indeed other renewable gases.

1.13 Phoenix's detailed comments on the proposed modifications to its licence are set out below and follow the licence structure for ease of review. For the avoidance of doubt, the condition references are to the Phoenix licence.

2. Condition 1.1 Interpretation and Construction

1.1.6 Definitions

2.1 The definition of a Gas Delivery Facility (**GDF**) is confusing, and the reasons provided by UR for the exclusion of “*any pipe-line or pipe-line system from which gas is or may be conveyed, by any person holding a licence granted (or treated as granted) under Article 8(1)(a) of the Order*” difficult to follow.

2.2 Furthermore, Phoenix does not understand the circumstances in which a licence may be “treated as granted”. Phoenix would ask UR to provide the reasons and effects of the terminology “*any person holding a licence [...] treated as granted [...] under Article 8(1)(a) of the Order*” in this definition and where used elsewhere in this suite of proposed licence modifications.

2.3 For transparency and readability, Phoenix would suggest the definition of a GDF:

means any building, structure, facility or pipe-line from which gas is, or may be, introduced into the Network, but excluding: any pipe-line or pipe-line system from which gas is or may be conveyed by any person holding a licence granted (or treated as granted) under Article 8(1)(a) of the Order

is replaced by:

means any building, structure, facility or pipework from which gas is, or may be, introduced into the Network, but excluding any pipe-lines that are owned and / or operated by any licensee

In paragraph 2.34 of the consultation UR states its understanding is that pipes that may form part of a GDF are pipework. This term would add clarity to the definition in licence. Furthermore, UR’s concern that there could be a scenario where pipe-lines as defined in the Gas Order form part of a GDF, could be addressed through the exclusion of “*any pipe-lines that are owned and / or operated by any licensee*”. Again this would add clarity to the definition in licence and is in line with the terminology used in the definition of Network in condition 1.1.6.

3. Condition 2.4 Connection Charges and Obligation to Connect

PART A – CONNECTION CHARGES – CHARGING METHODOLOGY STATEMENTS

2.4.3 Statement of connection charges and terms for connection of Gas Delivery Facilities to the Network

3.1 Phoenix recommends that the title of condition 2.4.3 is replaced with “*Statement of connection methodology for connection of Gas Delivery Facilities to the Network*” on the basis that:

- UR states⁴ that condition 2.4.3 no longer contains a requirement for likely costs and other terms to be included in the GDF Connection Charging Methodology Statement. Phoenix agrees with this change as the costs for connecting GDFs will largely be site-specific. The inclusion of “*connection charges*” in the title is therefore misleading.
- “*terms for connection*” are referenced in the title but no terms for connection are contained in the condition itself. The inclusion of “*terms for connection*” in the title is therefore misleading.

3.2 Furthermore, including the term “*Charging*” in the title of the statement (i.e. GDF Connection Charging Methodology Statement), when UR recognises that “*whilst there is a requirement to reflect in this statement charging methods and principles, there is not requirement to include costs*”⁵ may also be misleading. Phoenix would therefore ask UR to consider changing the title of the statement to “*GDF Connection Methodology Statement*”.

3.3 Phoenix notes UR’s recognition⁶ that covering comprehensively the content requirements set out in paragraph (b) of condition 2.4.3 can be challenging and UR’s disclaimer “*so far as reasonable practicable*” in licence to address this. Phoenix agrees that a disclaimer is needed, particularly for repairing and modifying a connection when Phoenix has yet to connect a GDF to its network and therefore does not have a sound basis to comprehensively address such arrangements in the GDF Connection Charging Methodology Statement. These arrangements will instead be detailed in the terms and conditions required under condition 2.4.15(a) for:

- the making and maintaining of a requested GDF connection, and
- the introduction of the gas from the GDF into the network,

for each individual site.

3.4 The DNOs and UR will need to discuss the appropriate timeline for development of the GDF Connection Charging Methodology Statements, particularly given the level of detail proposed by UR in condition 2.4.14 for inclusion therein. Further detail is provided in response to Part C below. Phoenix would also welcome discussion with UR as part of this consultation process on what form the direction referenced in part (a) of condition 2.4.3 will take.

⁴ Paragraph 3.216 of the consultation.

⁵ Paragraph 3.372 of the consultation

⁶ Paragraph 3.214 of the consultation.

PART B – PREMISES CONNECTIONS – OTHER REQUIREMENTS

2.4.4 Other provisions to be included in the Connection Charging Methodology Statement

3.5 UR states⁷ the “*proposed wording amendments relating to the differentiation between “persons” (rather than “cases”) and “classes of person” (rather than “classes of cases of person”)* align the licence drafting more closely with the provisions of Article 10A(3)(d) of the Gas Order which underpins this requirement. They also remove complexity from the drafting of the related licence obligations.”

3.6 For clarity, Phoenix would ask UR to set out what this means in essence by providing examples of what it defines as “*person*” and what it defines as “*classes of person*”.

2.4.5 The Connection Charging Methodology Statement to give likely indication of costs

3.7 Phoenix notes a typo in the opening sentence. “*Condition 0*” should be replaced with “*Condition 2.4.1*”

2.4.10 Prohibition on undue discrimination in relation to connections

3.8 Phoenix notes the different paragraphs are designed to mirror the different types of connection identified in conditions 2.4.1 and 2.4.2. As condition 2.4.10 sits within Part B, Premises Connections, the inclusion of paragraph (c) in relation to *Pipe-line Systems* is confusing and may be better captured in condition 2.4.2.

⁷ Paragraph 3.42 of the consultation

PART C – GAS DELIVERY FACILITY CONNECTIONS – OTHER REQUIREMENTS

3.9 UR justifies many of its proposed requirements for GDF connections in Part C on the need for stronger regulatory oversight and improved enforceability. However what is being delivered are overcomplicated and onerous requirements on licence holders committed to delivering a biomethane economy for NI.

3.10 Regulatory oversight and improved enforceability are key themes throughout Part C and Phoenix contends that proposed condition 2.4.22 already provides UR with strong regulatory oversight without having to set out all the detail in the licences. UR recognises that condition 2.4.22 constitutes “...a way of embedding into the licence flexibility to amend the obligations on licence holders as may be appropriate from time to time, **without having to set out all the detail in the licences** and undergo a licence modification process on each occasion. This would be both lengthy and entail substantial administrative burden.”⁸

3.11 Condition 2.4.22 therefore allows for the removal of all unnecessary detail in licence and all requirements that may evolve / quickly become redundant as policy development in support of the transition to a net zero economy continues.

3.12 Furthermore, in looking to future-proof licences, UR may simply frustrate GDF Operators by setting unreasonable expectations. For example, GDF Operators may expect:

- to see the detailed provisions set out in condition 2.4.14 in the GDF Connection Charging Methodology Statement, or
- the terms and conditions referenced in condition 2.4.15 to be made readily available whereas these will largely be site-specific and therefore cannot be provided off-the-shelf.

3.13 Comments on specific licence drafting in Part C is provided below.

2.4.14 Other provisions to be included in a GDF Connection Charging Methodology Statement

3.14 As requested in the corresponding condition for premises connections (condition 2.4.4), and for clarity, Phoenix would ask UR to provide examples of what it defines as “*person*” and what it defines as “*classes of person*” in relation to GDF connections.

3.15 Phoenix has previously raised with UR its concerns on the level of detail proposed for inclusion in condition 2.4.14 and has already recommended that paragraph (b) is removed on the basis that:

- (i) Condition 2.4.22 already provides UR with strong regulatory oversight. Indeed UR recognises this in the consultation and notes that condition 2.4.22 means it does not have to set out all the detail in licences:

3.357 *The Connection Charging Methodology Statement, GDF Connection Charging Methodology Statement and Calorific Value Management Statement are intended*

⁸ Paragraph 3.359 of the consultation.

to provide transparency and ensure robustness of regulatory arrangements in relation to connections, including in particular Gas Delivery Facility connections.

3.358 *As interest in Gas Delivery Facility connections continues to develop, and policy development in support of the transition to a net zero economy is ongoing, there may be a need for the regulatory arrangements to evolve. To ensure the regulatory framework in relation to connections remains appropriate and aligned with policy intent, we consider that there is a need for us to be able to require licence holders to make relevant revisions to these statements. The proposed arrangements for Authority direction provide a means to do this.*

3.359 *The proposed arrangements for Authority direction thus constitute a way of embedding into the licence flexibility to amend the obligations on licence holders as may be appropriate from time to time, **without having to set out all the detail in the licences** and undergo a licence modification process on each occasion. This would be both lengthy and entail substantial administrative burden.*

3.360 *We recognise that setting out regulatory arrangements in (what may become a series of) directions may be less user-friendly (for anybody wishing to look up the details of specific arrangements) than having them all in a consolidated licence. We note, however, that **directions are publicly accessible, so that transparency will be ensured.***

3.361 *We consider that on balance, the benefits associated with the proposed arrangements in relation to directions outweigh the disadvantages. **We consider that the proposed arrangements are both more efficient and allow for more timely adjustments to regulatory arrangements than what would be the case if more detail was to be embedded directly in the licences.***

3.362 ***We consider furthermore that the proposed licence arrangements enable us to better fulfil our statutory gas objectives in changing circumstances.***

(ii) UR does not go into this level of detail in the corresponding conditions for premises connections in Part B.

(iii) Phoenix will not be in a position to set out the requirements in paragraph (b)(ii) in any detail given that these will largely be site-specific. For example:

- Any extension or reinforcement of the network will need to be individually designed and costed.
- Repair of any gas plant will be specific to the damage incurred.
- Disconnection of a GDF from the network will be specific to each connection.

The requirements in paragraph (b)(ii) will instead be detailed in the terms and conditions required under condition 2.4.15(a) for:

- the making and maintaining of a requested GDF connection, and
- the introduction of the gas from the GDF into the network,

for each individual site.

Furthermore, responsibility for paying the costs of operating and maintaining the Gas Delivery Point have yet to be determined.

In looking to future-proof licences, UR:

- (i) may be stepping on the toes of ongoing policy development by DfE,
- (ii) is setting unrealistic requirements on DNOs, and
- (iii) may simply frustrate GDF Operators by setting unreasonable expectations on the level of detail that will be contained in the GDF Connection Charging Methodology Statement.

3.16 Phoenix therefore reiterates its previous recommendation that condition 2.4.14(b) is removed.

2.4.15 Gas Delivery Facility Connections – Requirement to offer terms

3.17 UR did not engage with Phoenix on the current drafting of condition 2.4.15 in advance of this consultation and the reasons and effects provided by UR do not address all of Phoenix's previous concerns. UR is proposing a complex regulatory framework that is not appropriate for NI, and further discussion is needed on condition 2.4.15 as part of this consultation process.

3.18 Whilst exception to the requirement to offer connection terms for a GDF are recognised in condition 2.4.18, these are not sufficient. The combined impact of condition 2.4.15 and 2.4.18, for example, steps on the toes of the network constraints project by the GNOs and ongoing policy development by DfE, as evidenced in our response to condition 2.4.18 below.

3.19 Phoenix has significant concerns with the proposed drafting in paragraph (a):

- In difference to the requirement to provide a GDF Connection Charging Methodology Statement, the requirements under condition 2.4.15 are not subject to UR direction and could require Phoenix to offer terms and conditions for connection of a GDF proposing to introduce any gas that falls under the definition of gas in Article 3(2) of the Gas Order into the network. Furthermore, if the definition of gas in Article 3(2) of the Gas Order changes, is it reasonable to place this obligation on Phoenix before the relevant preparatory work for developing the supporting regulatory framework has been undertaken by UR?
- UR's consultation states⁹ that the words "*as soon as possible*" in the introductory paragraph of condition 2.4.15 protect Phoenix from an obligation to offer such terms before the relevant preparatory work for the making of such an offer has been undertaken. This protection is needed as the terms and conditions will largely be site-specific and therefore cannot be provided off-the-shelf. However paragraph (a) of the licence uses the words "*as soon as reasonably practicable*". Phoenix would ask UR to confirm the reasons and effects of this differing terminology.

⁹ Paragraph 3.269 of the consultation.

3.20 Phoenix has significant concerns with the proposed drafting in paragraph (b)(i):

- Firstly, we do not understand UR's view¹⁰ that Article 10(5) of the Gas Order requires it to approve the terms and conditions relating to GDF connections. This conflicts with premises connections where UR details in condition 2.2A the minimum requirements to be included in the terms and conditions of gas contracts with domestic consumers. Notably terms and conditions for premises connections do not require UR approval. Instead it is the Connection Charging Methodology Statement that is subject to UR approval under condition 2.4.1. This seems a more appropriate interpretation of the Gas Order requirement.

Phoenix therefore recommends that UR adopts the same approach for GDF connections as it has taken for premises connections and only the GDF Connection Charging Methodology Statement under condition 2.4.3 is subject to UR approval.

- Secondly, UR states¹¹ that the reaching of agreement on the terms and conditions relating to GDF connections is, in principle, a matter for the party interested in the connection and Phoenix. *"There should not be a need for [UR] to be involved prior to the agreed terms and conditions being submitted for approval, unless there is a dispute between the licence holder..."* On that basis, if the terms and conditions are accepted by the applicant, and UR recognises that these are a matter for the applicant and Phoenix, UR should not unduly delay the connection. Phoenix is unable to properly consider the proposed licence drafting until UR provides direction on what form this approval process would take e.g. how would UR facilitate the approval process (e.g. does it have the appropriate expertise to assess technical and legal drafting), would approval be required for each injection site or for each type of gas, what would UR's timelines be for approval, what action would be required for any terms and conditions agreed before the licence condition takes effect.

3.21 Phoenix has significant concerns with the proposed drafting in paragraph (b)(ii). Phoenix has given the need for dispute resolution considerable focus as part of the development of its terms and conditions for introducing biomethane into its network. These terms do not identify a dispute settlement role for UR on the basis that if Phoenix and the applicant are unable to reach agreement following escalation within each individual organisation, a jointly nominated expert will be called upon to make the final settlement. This is in recognition of (i) the complexity of a GDF connection and the need for a suitably qualified expert to settle a dispute on what is a detailed and technical contract, and (ii) the need to be able to choose different experts based on the matter under dispute e.g. limitation of liabilities, safety requirements, insurance provisions. Under the proposed licence drafting, UR is positioning itself as this sole expert.

3.22 Phoenix therefore suggests that paragraph (b)(ii) is revised to mirror the arrangements in its terms and conditions for introducing biomethane into its network i.e.

[ensure that any terms and conditions offered by it pursuant to the requirements of paragraph (a) provide that where there is a dispute between the Licensee and the applicant in respect of

¹⁰ Paragraph 3.273 of the consultation

¹¹ Paragraph 3.275 of the consultation

the terms and conditions offered by the Licensee, either the applicant or the Licensee may make an application to the Authority for determination of the dispute.

is replaced by:

[ensure that any terms and conditions offered by it pursuant to the requirements of paragraph (a) provide that where] there is a dispute between the Licensee and the applicant in respect of the terms and conditions offered by the Licensee, a dispute escalation procedure is available with either the applicant or the Licensee able to make an application for determination of the dispute.

2.4.18 Exceptions to requirement to offer connection terms for a Gas Delivery Facility

3.23 Phoenix agrees that there will be exceptions to the requirement to offer connection terms for a GDF. However the ongoing workstreams in relation to biomethane (notably the network constraints project by the GNOs and the ongoing policy development by DfE), suggests that it is too early to determine these.

3.24 In looking to future-proof licences, UR may conflict with the development of the biomethane industry with the exclusion in paragraph (b) of offering terms for connection of a GDF where “*there is insufficient capacity in the Network to accept the delivery of the gas from the Gas Delivery Facility*”. The defined term “Network” relates to the Phoenix Licensed Area. Notably, and as UR is aware, the GNOs’ **Managing Network Constraints** project is designed to develop a robust evidence base to inform proposals to alleviate the network constraints projected to limit biomethane injection into the NI gas network and to provide a strategic, anticipatory approach to network development to ensure suitably robust capacity solutions over the long-term. Paragraph (b) may therefore conflict with NI’s wider strategic planning by the time these licence modifications take effect. Further discussion is needed as part of this consultation process to ensure that the drafting embeds into licence flexibility to amend the exceptions as policy develops without having to undergo a licence modification process on each occasion.

2.4.19 Calorific Value Management Statement

3.25 The proposed requirement for a Calorific Value Management Statement is another example of UR looking to future-proof licences when the regulatory framework is still under development. UR acknowledges that work has begun to develop this for the high-pressure network, but it is unclear how and if the findings of the billing methodology project will impact the distribution network.

3.26 As it stands, Phoenix does not consider that the proposed requirement for a Calorific Value Management Statement being subject to UR direction is sufficient and Phoenix therefore recommends that condition 2.4.19 is deleted until such time as the findings of the ongoing projects are known, how these may impact gas suppliers (e.g. could they facilitate varying CV measurements?) and indeed the consumer impact.

PART D – APPROVAL AND PUBLICATION OF STATEMENTS PREPARED UNDER THIS CONDITION 2.4

2.4.21 Publication of and compliance with statements prepared under this Condition 2.4

3.27 Phoenix suggests that paragraph (b) is merged into paragraph (a) for clarity i.e.

a) *implement and comply with the Connection Charging Methodology Statement and the GDF Connection Charging Methodology Statement, in each case as approved by the Authority under and in accordance with any provision of this Condition 2.4;*

b) *implement and comply with the Calorific Value Management Statement, as approved by the Authority under and in accordance with any provision of this Condition 2.4;*

is replaced by:

a) *implement and comply with the Connection Charging Methodology Statement, the GDF Connection Charging Methodology Statement, and the Calorific Value Management Statement, in each case as approved by the Authority under and in accordance with any provision of this Condition 2.4;*

2.4.22 Review and Revision of Statements – Direction by the Authority

3.28 Phoenix has commented on the strong regulatory oversight afforded to UR under condition 2.4.22 in response to the modifications proposed at condition 2.4.14 above. Phoenix would reiterate UR’s own recognition that this condition 2.4.22 constitutes “...a way of embedding into the licence flexibility to amend the obligations on licence holders as may be appropriate from time to time, **without having to set out all the detail in the licences and undergo a licence modification process on each occasion. This would be both lengthy and entail substantial administrative burden.**”¹²

3.29 Condition 2.4.22 therefore allows for the removal of all unnecessary detail in licence and all requirements that may evolve / quickly become redundant as policy development in support of the transition to a net zero economy continues.

¹² Paragraph 3.359 of the consultation.

PART E – CONNECTION DISPUTES – AUTHORITY'S ROLE

2.4.24 Resolution of disputes by the Authority

3.30 Phoenix suggests that paragraph (b) references paragraph (a)(i) for clarity i.e.

- a) *Any dispute referred to the Authority pursuant to Condition 2.4.24(a) which relates to a connection to the Network of any premises (and any non standard gas meter and any gas meter that is not owned by the Licensee (or any affiliate or related undertaking of the Licensee) and is located in any premises) which [...]*

is replaced by:

- a) *Any dispute referred to the Authority pursuant to Condition 2.4.24(a)(i) which [...]*

3.31 Phoenix has significant concerns with the role UR proposes it will take in condition 2.4.24 in relation to the determination of disputes relating to a GDF. Phoenix has given the need for dispute resolution considerable focus as part of the development of its terms and conditions for introducing biomethane into its network. These terms do not identify a dispute settlement role for UR on the basis that if Phoenix and the applicant are unable to reach agreement following escalation within each individual organisation, a jointly nominated expert will be called upon to make the final settlement. This is in recognition of (i) the complexity of a GDF connection and the need for a suitably qualified expert to settle a dispute on what is a detailed and technical contract, and (ii) the need to be able to choose different experts based on the matter under dispute e.g. limitation of liabilities, safety requirements, insurance provisions. Under the proposed licence drafting, UR is positioning itself as this sole expert.

3.32 Instead, Phoenix has proposed (see paragraphs 3.21 and 3.22) that the licence requires it to offer a dispute resolution process. This is contained in condition 2.4.15 and therefore Phoenix asks that paragraph (a)(ii) is deleted from condition 2.4.24.

PART F: DEFINITIONS AND INTERPRETATION

2.4.25 Interpretation and construction

- 3.33 Phoenix notes the definition of “*premises*” included in condition 2.4.25 only applies to condition 2.4 and for any other occurrences of the term in licence, the Gas Order definition applies.
- 3.34 UR considers that “*the proposed definition of the term “premises” has the effect of enhancing clarity and transparency of the licence drafting but has no material practical implications beyond that.*”¹³
- 3.35 Phoenix would question this as redefining “*premises*” in condition 2.4 of the licence only could cause confusion. Phoenix would therefore ask UR to consider whether the use of another term, e.g. property, in condition 2.4 would remove conflict with the Gas Order definition and achieve the clarity and transparency UR aspires to.

¹³ Paragraph 3.405 of the consultation.

4. Condition 2.10 Maintenance of Records

2.10.1 Recorded Information

4.1 The requirements to record the information detailed in paragraph (e) are already contained in the Phoenix Network Code. This paragraph could therefore be deleted to avoid duplication of compliance reporting requirements.