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Consultation On Seasonal Multiplier Factors For Gas Transmission

Thank you for the opportunity to respond to the consultation on Seasonal Multiplier Factors for Gas Transmission. This response is on behalf of Mutual Energy, which owns three of the four licenced gas transmission system operators in Northern Ireland: Premier Transmission Ltd., Belfast Gas Transmission Ltd. and West Transmission Ltd.

We welcome the signal from the Utility Regulator (UR) of the intention to carry out a more full review of the seasonal multiplier factors in conjunction with CRU (for periods beyond GY 26/27). We would also support a comprehensive analysis of the impact of moving towards a flatter seasonal factor profile to fully understand the impact of such a proposed change. We agree that such a review is timely given the changing nature of gas demand as the NI energy system progresses towards decarbonisation.

We would encourage early engagement with industry to ensure predictability of any changes and we look forward to engaging with UR on this in the near future.