

## **RESPONSE TO THE**

### **Consultation on the options for co-ordinating the relinquishing of firmus energy's supply exclusivity in the ten towns area**

Northern Ireland Manufacturing wish to formally respond to above consultation.

#### **The format of the consultation**

Firstly, we wish to comment on the format of this consultation which has proved to be quite incomprehensible and inaccessible for our members, even those who are large industrial users with a good background knowledge of the gas supply. While we appreciate that such documents must of necessity be technical in nature, we believe that, particularly in consultations which impact on consumers, every effort must be made to express the core issues in terms which can be understood by consumers. We might level many criticisms at the style, use of English, and information in this consultation, however, our greatest concern is that it does not attempt to identify the key impacts on the marketplace which consumers need to be aware of in order to form any opinion, to wit:

- Early market opening may bring lower prices to consumers
- Early market opening may mean the loss of discounts on pass through charges currently enjoyed by commercial consumers

While we appreciate that the Regulator cannot quantify or comment on commercial issues we believe that it is vital that such issues are identified for the benefit of consumers.

It is perverse that this consultation should pose the question, "Will consumers be confused?", when the consultation document itself only adds to that confusion.

We trust every effort will be made by the office of the NIAUR to ensure that future consultations which impact upon consumers or prices, will be expressed in good English, with a minimum of technical terms and a comprehensive view of market impacts and core issues.

#### **The substance of the consultation**

We have consulted with those of our members who are large industrial users and are affected by this consultation, notably those in the Ballymena, Ballymoney, Coleraine, Derry and Limavady areas who are most affected by the proposals. These commercial users report that they have no objection to the proposal to move the market opening date to a common date of April 2013 for large users. Due to the short time period allowed for this consultation we have not had an opportunity to consult with the vast bulk of our members who are SME's, although we anticipate that they are unlikely to have any objections to a common market opening date of 2015 for such users.

In relation to the question posed on network codes and associated costs we consider that the prime consideration must be to minimise costs for consumers.