



## **Response to Utility Regulator Consultation**

### ***Licence modifications to implement the fully ownership unbundled model in the gas transmission licences 2 May 2013***

**on behalf of**

**AES Ballylumford Power Ltd and AES Kilroot Power Ltd**

**14 June 2013**

*Queries to*

Commercial Department  
Kilroot Power Station  
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## **1. Introduction**

As a major stakeholder within the Northern Ireland gas market, AES Ballylumford Limited and AES Kilroot Power Limited (collectively “AES”) welcome the opportunity to respond to Utility Regulator Consultation Paper – *‘Licence modifications to implement the fully ownership unbundled model in the gas transmission licences - 2 May 2013’* (the “Paper”).

## **2. General Comments**

It is AES’ opinion that the proposals set out in the Paper represent a reasonable and balanced approach.

We would query if the proposed licence condition 2.12 (Independence of the Licensee) would have an impact on Mutual Energy’s future operation of the proposed Islandmagee Gas Storage Project, but that is an issue for Mutual Energy. AES is content that the proposed licence modifications are sufficiently robust to ensure adequate business separation.

AES would raise no other issues or concerns with proposals put forward in the Paper.