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Networks and Compliance Team  
Utility Regulator  
Queens House  
14 Queens Street  
Belfast  
BT1 6ED

11<sup>th</sup> March 2015

## Consultation on licence changes for gas entry products

Dear Sean,

Mutual Energy Limited (MEL) is grateful to have the opportunity to respond to this consultation on behalf of its two wholly owned subsidiaries Premier Transmission Limited and Belfast Gas Transmission Limited, which hold licences to convey gas granted pursuant to the Gas (NI) Order 1996.

MEL mainly agree with the licence amendments proposed in the consultation published on 2nd February 2015 however we request that you note the following comments before finalisation of the licence;

- Condition 2A.2.3.1 a (iii) should note "GY+1 to GY+4", the number 4 appears to be missing.
- We would consider it more appropriate to publish the table from condition 2A.2.5. outside the licence. It could be included with the Gas Transmission Charging Methodology Statement or the Gas Product Multipliers and Time Factors document, both of which will be published annually and therefore would provide for ease of amendment.
- In addition, as all products at both entry Interconnection Points are individually listed in the table in condition 2A.2.5 we think it would be appropriate to detail each exit location for consistency and to demonstrate the common tariff.
- In relation to licence condition 2A.2.5.4 we do not think that the treatment of quarterly products is sufficiently clear. Under this condition quarterly products would fall under (c) to be treated as a Non Annual Capacity Product however this formula would calculate the entire cost for the quarterly product, i.e. the cost for three months, to be included on the monthly invoice. We propose that quarterly products are invoiced over the three month period to which the product relates. We would imagine this would be more beneficial for Shippers than invoicing for three months quarterly capacity on one monthly invoice therefore we consider an amendment to this condition is necessary to reflect this.

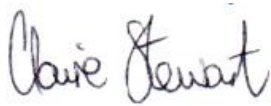
- The fraction bar is missing in the formula in condition 2A.2.6.2.

## Conclusion

MEL believes that, subject to the changes suggested above, the licence modifications are adequate to facilitate the introduction of gas entry products into the Northern Ireland postalised regime in advance of October 2015. We understand that further licence modifications may be necessary to reflect CMP changes.

Should you wish to discuss any aspect of our response please do not hesitate to contact me.

Yours sincerely,



Claire Stewart  
Gas Analyst