



Mr. Roy Colville,
The Utility Regulator,
Queen's House,
14 Queen Street,
Belfast BT1 6ED
Northern Ireland

4th April, 2016

Re: Proposed Licence Modifications to the Gas Conveyance Licence to ensure European Compliance

Dear Roy,

GNI (UK) welcomes the opportunity to respond to the Proposed Licence Modifications to the Gas Conveyance Licences as published by the Utility Regulator on 3rd March, 2016 (the "Consultation Paper").

Our response considers the four areas which are under consideration by the Utility Regulator in this consultation.

2.0 Forecasting Party

This proposed modification does not result in any changes to the GNI (UK) Gas Conveyance Licence and we have no comment on this.

3.0 Contract Approval for Gas Agreements

GNI (UK) does not fully understand the change proposed as outlined in section 3.0 of the Consultation Paper. GNI (UK) questions the necessity of this proposed change to ensure European compliance. Such compliance is achieved through GNI (UK)'s legal obligations to take such steps and do such things as are within its power to amend relevant agreements to comply with European Network Codes and/or to give timely effect to legally binding decisions of the European Commission or Agency.

4.0 PTL Transportation Agreement

The Gas Transportation Agreement is an agreement between PTL and GNI (UK) which is approved by Ofgem. This is an agreement between PTL and GNI (UK) for the provision of Transportation services at Twynholm. GNI (UK) notes the proposed change to PTL's Licence. More detail is required on how this proposed Licence modification would work from a Licence jurisdiction perspective. Modifications to this agreement have been successfully implemented as recently as October, 2015. There are inter-jurisdictional arrangements in place between

the three TSOs and Regulatory Authorities, whereby Ofgem, the Utility Regulator and the CER currently have oversight of amendments to this agreement.

5.0 Part 2A Licence Changes

GNI (UK) recognises and supports the requirement for accurate forecasted capacity bookings for network users. GNI (UK) will provide suppliers with quarterly information on the total amount of capacity booked at entry and exit in the relevant quarter for each capacity product as proposed by the Utility Regulator.

Please do not hesitate to contact me if you have any queries regarding this response.

Yours sincerely,



Celine Hayes,
European & Regulatory Affairs Manager,
GNI (UK)