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Ms Tanya Hedley
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By email: gas_networks_responses@uregni.gov.uk

17 July 2018

RE: Further Consultation on Granting of WTL Security Consent

Dear Tanya


Thank you for your letter of 16 July 2018 in relation to the need for WTL to grant further rights in respect of security over its network assets.

As you are aware from our previous responses in respect of the granting of WTL security consent, GNI (UK)'s main concern is that any transferee of the WTL network will have the capability to discharge the function of a transmission system operation ("TSO"). To this end, we note your letter of 20 June 2018 where you clarified that the granting of the consent by you does not imply any decision has been made to grant the further consents necessary for additional disposals. We further note your confirmation that *"an extremely important element in [our] considerations would certainly be whether the person to whom the network assets or licence were proposed to be transferred had the competence to perform the obligations of a TSO."*

On the basis that the confirmation previously provided by you in your letter of 20 June 2018 applies equally to the rights in respect of security over the network assets to the Department of the Economy, GNI (UK) has no objection to the granting of the further rights. However, please let us know if our understanding of the position is incorrect.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

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Brian Mullins
Regulatory Framework Manager
Gas Networks Ireland on behalf of GNI (UK) Limited