

Roisin McLaughlin
Northern Ireland Authority for Utility Regulation,
Queens House,
14 Queens St.,
Belfast BT1 6ED

17 October 2011

Implementation of IME3 consultation and NI Domestic Market Opening - Six Month Review Findings Paper

Dear Roisin,

Thank you for the opportunity to respond to this consultation. BGE(UK) were not aware from the introductory notification and the paper synopsis that the consultation related to proposed changes to the BGE(UK) Transmission licence. It was our understanding that the consultation dealt with Consumer/Domestic Market elements of IME3.

BGE and BGE(UK) are fully supportive of the Regulator's objective of achieving compliance with the 3rd Energy Directive. To this end we have sought to proactively engage with the Regulator on these matters and continue to do so. As part of this ongoing process, Will Roche and Padraic O'Connell of BGE are meeting with the Gas Directorate at NIAUR this week.

In relation to the consultation of the 7th of September, BGE (UK) was unable to attend the workshop as no notification of an invitation to the event was received. We welcome any opportunity to engage with the Regulatory Authority and stakeholders in Northern Ireland and we attach again to this letter contact details for our personnel as advised to the Gas Directorate in January 2011. We would be grateful if these contacts could be added to your circulation list for all future workshops/consultations.

In respect of the two proposed new licence conditions for the BGE (UK) Transmission licence, 2.18 and 2.21, we have a number of concerns which we would like to raise initially.

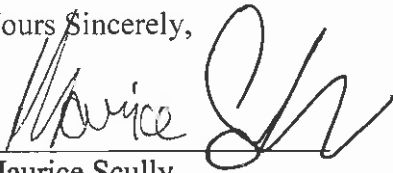
In Section 2.18(b) we are concerned that the proposed modification appears to impose uncertainty with regard to the provision of information. In relation to Section 2.21 regarding the construction and operation of cross border capacity, our concern is that

the drafting does not fully reflect the language used in the directive. These proposed amendments we feel require a more detailed discussion and review with the licensee. Finally we are also unclear as to the process by which NIAUR intends to implement any proposed licence modifications arising out of this consultation process, and the key dates and timelines associated with this process.

Given the short time available to us to respond to this consultation, we welcome the opportunity to meet with the Regulator at the earliest possible opportunity to discuss our concerns.

We look forward to hearing from you.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Maurice Scully". The signature is written in a cursive style with a large, stylized "M" and "S".

Maurice Scully
Regulatory Controls Manager

Key Personnel for Northern Ireland related activities

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