

19-01-10

Brian McHugh,
Gas Director,
Northern Ireland Authority for Utility Regulator,
Queens House,
14 Queen Street,
Belfast, BT1 6ER.

Re: "Forward Work Programme (April 2010 - March 2011)"

Dear Brian,

BGE (NI) welcomes the opportunity to respond to the consultation paper "Forward Work Programme (April 2010 – March 2011)". BGE(NI) are happy to work and cooperate with the Utility Regulator in carrying out their Workplan for 2010-2011 and are available to respond to any request from NIAUR to assist in same.

BGE (NI) believe that from both an economic and environmental perspective there is scope for, and advantages to, the continued development of the natural gas industry in Northern Ireland with particular reference to Natural Gas being the transition fuel from a high carbon to a low carbon economy.

In relation to the specific section on "Protecting consumers by ensuring utility monopolies act efficiently" we understand that similar preparation for the next Transmission Price Controls is also underway for all of the Transmission utilities in NI. BGE(NI) believe it is important that the level of administration placed on companies is consistent, and not excessive, as otherwise it could simply result in increased and inefficient costs to the NI consumer.

We also acknowledge that the work undertaken by the Utility Regulator is of key importance to the development of the gas industry with specific reference to CAG where proper implementation is key to an efficient market and minimising costs to the consumer. It is BGE(NI)'s view that priorities should be placed in delivering an improved customer service while allowing for appropriate incentive mechanisms to invest in capital and also allowing for operating expenditure which has been efficiently occurred.

If you have any queries on the above please do not hesitate to contact me and I would like to restate that BGE(NI) look forward to working with the Utility Regulator in the undertaking of their work programme.

Kind Regards,

Denis Twomey,

Commercial Operations Manger

Bord Gais Networks