

Irish Offshore Operators' Association

Tramway House
Dartry Road,
Dublin 6

Mr Robert O'Rourke,
Commission for Energy Regulation,
The Exchange,
Belgard Square North.
Tallaght,
Dublin 24

18th July, 2008

**RE: SINGLE APPROACH TO GAS QUALITY, CONSULTATION PAPER
(CER/08/101).**

Dear Mr. O'Rourke,

On behalf of the Irish Offshore Operators' Association (IOOA), I would like to thank you for the opportunity to comment on the above referenced consultation paper.

By way of background, IOOA was founded in 1995 and is the representative organisation for the Irish offshore oil and gas industry. Its members are the companies licensed by the Government to explore for and produce oil and gas in Irish waters. IOOA members cooperate to provide a common approach to many of the issues arising from the development of oil and gas exploration and production in Ireland's waters. Arguably the most important of these is safety.

IOOA is committed to the safe and secure operation of the gas transmission and distribution systems in both jurisdictions. We acknowledge that the matters highlighted in the consultation paper warrant a thorough analysis and having reviewed the related reports, we are not satisfied that the subject matter has been appropriately investigated.

At the CER workshop in Belfast on 8th July 2008, it was agreed that the issues raised in the above referenced consultation paper are best investigated by a multi-disciplined task group drawn from all affected constituencies. We understand that the authorities have agreed to the formation of such a task group and therefore propose that any decision to consider changes to gas quality is deferred until the proposed task group is in a position to make any recommendations. IOOA recognises that there are both technical and commercial facets to the recommendations proposed in the consultation paper and related reports and we would welcome the opportunity to provide both technical and commercial representatives to this task group.

Yours sincerely,

Fergus Cahill
Chairman, IOOA

Cc: Mr. Tom Reeves, Commissioner for Energy Regulation
Mr. Ciarán Ó hÓbáin, Principal, Petroleum Affairs Division,
Dept. of Communications, Energy and Natural Resources