



Shell E&P Ireland Limited

18th July 2008

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

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Re: Single Approach to Gas Quality, Consultation Paper CER/08/101

Dear Mr O'Rourke,

With reference to the consultation paper entitled "Single Approach to Gas Quality" published by the CER on 20th June 2008, we would make the following comment:

The issues raised in the paper, such as gas specification, operational safety, measurement arrangements, cost implications etc. are significant and wide ranging. As such, any decisions taken at this time will have long-term implications for industry participants.

The analysis undertaken to date, based to a large degree on a review carried out by Bord Gais as published in the "Report on Gas Quality arrangements in Republic of Ireland" dated April 2008, seems to consider the issues predominantly from a Transporter perspective, and hence potentially fails to identify alternative solutions that may be available to address the concerns raised. Given the significance of the issues we would suggest that it would be more appropriate for a wider representation of gas industry participants to examine these issues in more detail before any final decisions are taken. We would of course be happy to participate in any such further analysis and can assure you that we will continue to support any issues relating to the safety of gas supply.

Rather than address specific points raised in the consultation paper at this time we would therefore propose that more time be given for further examination of the issues by a representative cross-section of the gas industry, to allow a fuller examination of the concerns and potential solutions available.

Yours sincerely,

Julian Cetti
Head of Commercial and Business Strategy