



The Consumer Council

Richard Hume
NIAUR
Queens House
4 Queen Street
Belfast
BT1 6ER

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GAS STORAGE REGULATORY FRAMEWORK CONSULTATION

Dear Richard

The Consumer Council welcomes the opportunity to comment on the Northern Ireland Authority for Utility Regulation's (NIAUR) Gas Storage Regulatory Framework consultation paper.

The Consumer Council recognises the strategic importance of introducing gas storage facilities in Northern Ireland and the flexibility that it can bring in potentially reducing exposure to expensive imported gas.

The Consumer Council is content with NIAUR's proposed approach in relation to third party access (TPA) regimes, exemptions to access and licence conditions. The proposals appear to comply with relevant EU guidelines and also are consistent with the approach taken by Ofgem which appear to have worked satisfactorily in GB.

We are particularly pleased that there will be a general condition in all gas storage licenses requiring consultation with the Consumer Council and we recognise that we will have an opportunity to comment on such a condition when the licence is publicly consulted on.

In terms of the geographic and product market applicable, given the strong links with ROI and GB in terms of the SEM, import market and interconnectors we would consider that the region should encompass both GB and ROI. Encompassing such regions would reduce the level of market power which

could potentially be exerted by a sole storage operator in NI as stated by NIAUR.

I trust you find this useful. If you require further information please contact me.

Yours sincerely

Joanne Gamble
Senior Consumer Affairs Officer