

20 May 2015  
Sean Murphy  
The Utility Regulator  
Queen's House  
14 Queen Street  
Belfast  
BT1 6ED

Dear Sean,

**Consequential changes to gas low pressure and supply licences arising from the introduction of the new gas day and entry charging.**

Thank you for the opportunity to respond to this consultation. Firmus energy (FE) is pleased to have the opportunity to engage with the Utility Regulator (UR) in helping determine the gas licence modifications required as part of the introduction of entry charges and a change in the gas day in the Northern Ireland postalised regime.

**Gas day licence changes**

Commission Regulation (EU) No 984/2013 (the Capacity Allocation Mechanism (CAM) Code), establishes a new gas day from 5am to 5am. FE agrees that although the CAM code does not need to be implemented within distribution zones, all gas networks in NI should operate to the same gas day, thereby minimising complexity in interactions between the network operators.

FE supports the UR's proposed modification to change 6am, where it is used, to 5am in all the low pressure conveyance licences and supply licences.

**Changes consequent to the introduction of entry capacity**

**Low pressure conveyance licences.**

FE recognises the need for the minor clarification modifications given the introduction of entry capacity in October 2015. FE supports the UR's proposal to change 'capacity' to 'exit capacity' and the definition of 'exit capacity' within low pressure conveyance licences.

**Supply licences.**

Shippers will be required to complete the Shipper Forecast Information request under the Transmission Network Code but at present the specifics of these code modifications have not been finalised or come into effect. FE notes that the current gas supply licence conditions (3A.2.2) mirror those of the current Transmission Network Code (13.7.1).

FE highlights the risk of proposing and implementing a supply licence modification that relates to Transmission Network Code changes that are not absolutely confirmed. FE recognises that the new Condition 3A.2.2.1 is a high level condition, but FE is also cognisant that the relevant Transmission Network Code modifications could alter.

In conclusion, and to avoid any doubt in terms of shipper obligations, the UR should ensure that the supply licence modifications are fully aligned with all relevant finalised Transmission Network Code modifications.

FE looks forward to its continued involvement in this process.

Yours sincerely,

Peter McClenaghan

Regulatory Affairs Manager