

10th June 2015

Graham Craig
Gas Branch
The Utility Regulator
14 Queens Street
Belfast
BT1 6ER

Dear Graham,

Thank you for the opportunity to respond to the Consultation on Seasonal Multipliers used in Calculations of Short Term Entry Capacity Tariffs.


Firmus energy supports the application of seasonal multipliers within the new Northern Ireland postalised regime for gas, as an interim measure, until such time as the Network Code on Tariffs is implemented in Northern Ireland.

Firmus energy considers the adoption of the current Republic of Ireland (ROI) multipliers and methodology an appropriate initial approach for the new Northern Ireland regime which is due to come into effect in October 2015.

It is important that the consequences of using the ROI seasonal multiplier methodology are monitored and reviewed by the Utility Regulator. Review results can be considered and applied on implementation of the Network Code on Tariffs.

Firmus energy looks forward to its continued involvement in this process.

Yours sincerely,



Peter McClenaghan
Regulatory Affairs Manager