



Your Ref

Our Ref

Date 24 May 2016

Being dealt with by Alison McCullagh

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Mr Paul Harland
Finance and Networks Assets
Queens House
14 Queen Street
BELFAST
BT1 6ED

Dear Mr Harland

Fermanagh and Omagh District Council welcomes the opportunity to respond to the draft determination for GD17, the price control for the gas distribution companies Phoenix Natural Gas Ltd (PNGL), firmus energy (FE) and SGN Natural Gas Limited (SGN) for the years from 2017 and onwards.

In the context of the forthcoming Gas to the West project, the Council broadly welcomes the proposed package of measures to continue the efficient growth of the gas industry in Northern Ireland through building more pipelines and increased connections.

At the outset, the Council would wish to ensure that the needs of the user (residential and commercial) are prioritised and as such, the regulator should ensure that GD17 maximises the consumer rather than operator incentives.

Fermanagh and Omagh District Council would wish to highlight the particular challenges faced by residents and businesses across our district in relation to alternative energy sources. While Gas to the West now offers a viable alternative for parts of our Council district, to maximise the uptake of the initiative, generous consumer pricing incentives should be introduced and safeguarded by the Regulator.

In this regard, the Council would wish to highlight the fuel poverty for several parts of our district, including areas which are due to be reached by the Gas to the West project.

The 2011 Housing Conditions Survey recorded housing unfitness rates across the Council area at 7%; the NI average was 4.6%;

The same survey estimated that 14% of dwellings were recorded as failing decent homes standards;

Average wage levels in the District are below the NI average (£20,793 and £23,643 respectively).

In addition, and on a more qualitative measure, emerging work on our Community Plan for the Council area, has an outcome our district has reduced its carbon footprint by becoming more energy efficient and Our District has improved public utilities infrastructure, with promoting the level of uptake of gas an indicator of success. Appropriate consumer pricing incentives will therefore contribute towards this indicator.

The Council also wishes to highlight the rurality of its district and while some rural parts of the Council area, such as Derrylin, will benefit from the gas infrastructure, many other areas will not be able to avail of the infrastructure.

The Council trusts that these comments will be taken on board in this important consultation.

Yours sincerely



Alison McCullagh
Director of Regeneration & Planning