



25 November 2009

Elena Ardines
Utility Regulator
Queen's House
Queen Street
Belfast
BT1 6ER

Dear Elena

Re: Forward Work Plan (April 2010-March 2011)

Thank you for providing firmus energy with this opportunity to respond to the above.

We note that the Utility Regulator's principal objective is to promote the gas industry in Northern Ireland and we welcome comments within the consultation acknowledging firmus energy's contribution to the development of the natural gas market and that of our parent company, BGE, with the development of the South North and North West pipelines.

We look forward to working with the Utility Regulator and other key stakeholders to promote the economic and environmental benefits of natural gas, by encouraging the uptake of natural gas across the licensed areas.

In our experience, customers will not convert from their existing heating or hot water systems to natural gas without a financial incentive. firmus energy would therefore welcome increased collaboration between DETI and the Utility Regulator to agree policies that will promote the benefits of natural gas and to challenge policy makers to choose natural gas as a low carbon alternative to coal and oil, where it is available.

Over the coming year firmus energy would also welcome the opportunity to review with the Utility Regulator and DETI our current licence arrangement which suggests a phased opening of the 10 towns market as we feel that this approach would be ineffective, costly and indeed difficult to implement.

I trust you find these comments useful.

Yours sincerely

Michael

Michael Scott
Head of Business Development