



GNI (UK) Response

Consultation on proposed modifications to High-Pressure Gas Conveyance Licences

May 2019



Part of **ervia** group

1. Introduction

GNI (UK) is the owner and operator of the North-West gas pipeline, which runs from Carrickfergus to the Coolkeeragh power station in Derry and the South-North gas pipeline, which runs from Gormanston, in County Meath, to Ballyclare, Co. Antrim, where it links into the North-West pipeline. GNI (UK) is licensed by the Utility Regulator (UR) to operate these gas transmission pipelines accordingly. GNI (UK) also operates the South-West On-Shore Scotland system (SWSOS), through which the Republic of Ireland, Northern Ireland (NI) and Isle of Man gas supplies are transported on a daily basis.

2. GNI Response to Consultation Questions

GNI (UK)'s welcomes the opportunity to respond to the consultation by the Utility Regulator (UR) on proposed modifications to High-Pressure Gas Conveyance Licences. GNI (UK)'s responses to the licence conditions impacted by the proposed modifications to High-Pressure Gas Conveyance Licences issued on 11th April 2019, are outlined in turn.

Proposed Modification 1

Conveyance Charges, Other Terms for the Conveyance of Gas and the Provision of Conveyance Services, Disapplication, Allowed Operating Expenditure.

GNI (UK) are in agreement with the proposed modification. The proposed change is of a minor nature but will aid clarity by aligning with contemporary mathematical notation.

Proposed Modification 2

Capitalised Interest.

GNI (UK) are in agreement with the proposed modification.

Proposed Modification 3

Grants Received.

GNI (UK) are in agreement with the proposed modification.

Proposed Modification 4

Debt Interest.

GNI (UK) are in agreement with the proposed modification. The proposed change will provide greater clarity of the components of the formula.

Proposed Modification 5

Opex Nominal LIBOR2 Adjustment.

GNI (UK) are in agreement with the proposed modification. The proposed change will provide accuracy by clarifying sequencing of the adjustment formula.

Proposed Modification 6

Network Code.

GNI (UK) are in agreement with the proposed modification. The proposed change is reflective of the completed evolution to the operation of a single transmission network code.

Proposed Modification 7

The Postalisation System Administrator, The PSA's functions.

GNI (UK) are in agreement with the proposed modification. The proposed change is reflective of the operation of invoicing by the Postalisation System Administrator.

Proposed Modification 8

Tariff Notification Date.

GNI (UK) are in agreement with the proposed modification. The proposed change is reflective of the existing timelines for publication of the Postalised Transmission tariff.