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26th February 2018

Consultation Paper on Proposed Standardisation of Licence Condition – ‘Connection Charges and Obligation to Permit a Connection’ and Consequential Licence Changes

Dear Veronika

Mutual Energy welcomes the opportunity to comment on the Utility Regulator's Standardisation of Licence Condition Consultation Paper dated 30th January 2018.

The Mutual Energy Group holds three Licences affected by the proposed changes namely Belfast Gas Transmission Limited, Premier Transmission Limited and West Transmission Limited.

We understand the proposed drafting has been developed for the purpose of standardising the Connection Charges and Obligation to Connect Licence Conditions for both the Low and High-Pressure Licences. We also note the drafting deals with the replacement of the Northern Ireland Network Operators Agreement (NINOA) which has been replaced by the Single Operator Agreement (SOA).

We do not have substantive comments with regards to the proposed drafting however we have included a general comment below.

General Comments

We acknowledge the transfer of the requirements of Gas Regulatory Letter No 1 into the proposed Licence drafting transferring the requirement to comply with the side letter to the Licences.

Connection requests to High Pressure Networks are rare in comparison to the volume of requests to low pressure networks and as such include individual requirements specific to each applicant and location. The impact of those requirements on the local and wider high-pressure network are assessed by undertaking studies and detailed modelling of the potential effect on the network now and into the future. It is for this reason a Statement of Connection Charges and Terms for Connection to high pressure networks only includes high level estimated charges for a simple connection.

Please do not hesitate to contact me if you would like to discuss any of the above comments.

Yours sincerely,

Marcus McFarlane
Project Engineer