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Elena Ardines
Strategy Branch
The Utility Regulator
Queens House
14 Queen Street
Belfast BT1 6ED

9th January 2012

Dear Elena,

Draft Forward Work Programme (April 2012 – March 2013)

Thank you for the opportunity to comment on the Utility Regulator's draft Forward Work Programme for 2012/13. We welcome the clarity this provides for the forthcoming year and believe that by adopting a transparent strategy, the Utility Regulator (UR) is ensuring that the most prevalent issues faced by the energy sector may be prioritised.

The scope of work to be completed by UR in the forthcoming financial year is challenging; UR will need to work alongside the Northern Ireland natural gas industry to implement any decision to extend the natural gas network, to implement the decision to introduce competition within the ten towns area, to implement all the requirements of the EU Third Internal Energy Package, to complete the harmonisation arrangements under the common arrangements for gas project etc. as well as deliver on the requirements of the current regulatory regime e.g. progressing price controls and competition activities.

As UR is aware, utilities operate under very tight regulatory manpower and cost controls. We would therefore remind UR that due consideration must be given to the timetabling of any consultations to allow companies an appropriate timeframe to ensure that the quality of responses received from companies is at the highest possible level. This is essential based on the experience and knowledge that utility companies can bring to each process given the very significant issues being addressed. In addition at a previous UR workshop the idea was floated that instead of having such 'wide-ranging' consultations it may be preferable for key representatives from industry to attend workshops prior to any public consultation to discuss in detail the principle issues surrounding a specific consultation. It was agreed that this approach may prevent misunderstandings being consulted upon and would enable key stakeholders to impart their experience and knowledge in a face-to-face forum. We would

wish to know whether UR is still considering this approach and if so when a decision may be taken.

Phoenix Natural Gas and Phoenix Supply, who have already commented on many of the areas covered within the programme, will continue to engage with UR and endeavour to provide as much information as we can throughout 2012/13 to ensure that UR has all the necessary information to develop and implement effective policies.

In the meantime if we can provide any further information please do not hesitate to contact me.

Yours sincerely,

Abigail

Abigail McCarter
Regulatory Manager
Phoenix Natural Gas Ltd