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Queens House
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28th February 2013

**Consultation Paper: Implementing the European Gas Regulation (EC) 715/2009
in Northern Ireland**

Dear Ms. McLaughlin,

ESB Generation and Wholesale Markets (ESB) welcomes the opportunity to respond to the consultation regarding European Gas Regulation in Northern Ireland. As part of the third legislative package in July 2009, Northern Ireland is required to introduce an entry exit tariff system as opposed to the point to point tariff system that is currently in place. This consultation concentrates on the delivery of a single system operation in NI from the current arrangement of 3 separate TSOs under the premise that rationalising the systems operations for NI will lead to future increased efficiencies when subsequently introducing an entry exit system.

We agree in principle with the establishment of a single TSO provided that this process is completed using the least cost method available and results in an efficient utilisation of systems and information. If you would like to discuss any aspects of this response in more detail, please do not hesitate to contact me.

Kind regards,

Karol O'Kane,

Regulatory Analyst

ESB G&WM