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15^h January 2015

By email only

Sean Hennity Ofgem 9 Millbank London SW1P 3GE

Dear Sean

Re: Proposal to modify Standard Licence Condition 30 (Regulatory Accounts) of the Gas Transporters Licence and make consequential modifications to Standard Licence Condition 1 (Definitions), Standard Licence Condition 44 (Availability of Resources) and Standard Licence Condition 30A (Change of Financial Year)

Brookfield Utilities UK ("BUUK") welcomes the opportunity to respond to the proposal to modify standard licence conditions 30, 30A and 44 of the gas transporter licence to amend the Independent Gas Transporter ("IGT") regulatory accounting and reporting requirements. BUUK is the parent company of the IGT licensees GTC Pipelines Limited ("GPL"), Independent Pipelines Limited ("IPL") and Quadrant Pipelines ("QPL").

BUUK supports the proposed amendments to the gas transporter licence and the changes the revised conditions will bring. We view the proposed changes as pragmatic by bringing the licence requirements in line with the European directive whilst also reducing the regulatory burden of submitting regulatory accounts to Ofgem. As an owner of the Independent Distribution Network Operators ("IDNOs") The Electricity Network Company Limited ("ENC") and Independent Power Networks Limited ("IPNL") we also welcome the changes on the basis that the licence requirements for financial reporting and accounting have now been harmonised, which will allow us to streamline our related processes.

Should you wish to discuss any of the comments raised in this response, we would be happy to discuss these further.

Yours sincerely

Michael Harding Head of Regulation