

16<sup>h</sup> July 2015

**By email only**

Paul Darby  
Ofgem  
9 Millbank  
London  
SW1P 3GE

Dear Paul

**Re: Proposed modifications to Standard Licence Condition (SLC) 30 (Regulatory Accounts), SLC 1 (Definitions), SLC 30A (Change of Financial Year) and SLC 44 (Availability of Resources) of the Gas Transporters Licence**

Brookfield Utilities UK ("BUUK") welcomes the opportunity to respond to the proposal to modify standard licence conditions 1, 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").

Since our response in January 2015 to the informal consultation on the changes, we note that a small number of further amendments have been made to the licence drafting. BUUK is supportive of these additional changes as they bring further clarity to the application of the requirements. In line with our response to the informal consultation, 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