

Mr. Kristian Marr
Interim Head of European Wholesale Markets
Ofgem
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Canary Wharf
London E14
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18 December 2020

Cc: Mr. Liam O’Riordan, Company Secretary, Gas Networks Ireland
Mr. Brian Mullins, Head of Regulatory Affairs, Gas Networks Ireland

RE: Statutory consultation on consequential licence modifications due to the end of the Transition Period

Dear Mr. Marr,

Gas Networks Ireland (GNI) along with its subsidiary GNI (UK) Limited (“GNI (UK)”) own the interconnector between Moffat in Scotland to the end of UK Territorial Waters. GNI alone is the owner of sections of the Moffat interconnector pipeline between the limit of UK Territorial Waters and the UK Continental Shelf and it is in this regard that GNI was granted a gas interconnector licence under section 7ZA of the Gas Act on 12 July 2020.

GNI welcomes the steps taken by Ofgem to ensure a smooth exit of the UK from the European Union as we approach the end of the Transition Period. As part of these preparations, we have reviewed the statutory consultation in relation to proposed changes to the Gas Interconnector Licence, Gas Supply Licence and Gas Transporter Licence.

We note that the proposed modifications “do not seek to change the current obligations and duties of licensees, nor do they seek to change current policy positions” but rather ensure that licences accurately reflect retained EU law and will continue to function effectively from January 1st 2021 onwards.

Having reviewed the proposed modifications, GNI shares the understanding that current obligations and duties of GNI will not change. Nevertheless, we note the following amendment:

“If at any time the licensee knows or reasonably should know that, on or after IP (Implementation Period) completion day, any event or circumstance has occurred, or is likely to occur, that may cause the Authority to think that the licensee is or may become a person from a country outside of the United Kingdom, or that a person from a country outside of the United Kingdom has or may take control of the licensee, the licensee shall as soon as reasonably practicable notify the Authority in writing”

We recognise and acknowledge that the above places an obligation on GNI to notify Ofgem in writing that GNI “is a person from a country outside of the United Kingdom”.

Consequently, GNI will contact Ofgem formally in January 2021 notifying it of same.

Yours Sincerely,

Sent by email, bears no signature

Áine Spillane
Regulatory Affairs Manager
Gas Networks Ireland