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Ms. Heather Stewart
Ofgem
European Coordination
Systems & Networks
10 South Colonnade
London
E14 4PU

15th February 2019

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

Re: **Response to Ofgem Consultation – Statutory consultation on licence modifications in the event the UK leaves the EU without a deal**

Dear Ms. Stewart,

GNI (UK) Limited (“GNI (UK)”) welcomes the opportunity to respond to the Statutory consultation on licence modifications in the event the UK leaves the EU without a deal, which was published by Ofgem on 14 January 2019.

GNI (UK) acknowledges that minor consequential modifications will be required to the Gas Interconnector Licence in the event of a no deal Brexit with the aim of ensuring that retained EU law will function effectively at the point of exit and notes 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. This is an approach which we welcome as it is prudent to ensure that any modifications made at this stage are minimal.

GNI (UK) has reviewed the proposed changes, in conjunction with the reasons provided, and for the most part are in agreement with the proposed amendments.

GNI (UK) notes that it is proposed to amend the definition of “regulatory authority” to include the wording “and where appropriate the Northern Ireland Authority for Utility Regulation”. The rationale provided for this change is *‘for the purposes of “regulatory authority” in condition 10 to ensure NIAUR remains included’*. GNI (UK) accept the

rationale for this inclusion, however we would appreciate if further clarity was provided regarding circumstances whereby "where appropriate" would take effect. GNI (UK) is of the opinion that the current proposed text adds ambiguity as to when NIAUR is included. The proposed change to the definition of "regulatory authority" may therefore benefit from some clarity in this regard.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Con O'Donnell", is written over a horizontal line.

Con O'Donnell
Regulatory Framework Manager
Gas Networks Ireland on behalf of GNI (UK) Limited