

18<sup>th</sup> April 2012

Aidan Hogan

BGE (NI) c/o Gaslink

Gasworks Road

Cork

**Re: Transportation Network Code Proposed Modification No. 8**

Dear Aidan,

firmus energy welcomes this opportunity to respond to the proposed modification. Changes to the existing BGE(NI) Network Code are essential to facilitate effective and efficient Market Opening for large Industrial and Commercial customers in the 10 Towns market. firmus energy recognise that the changes outlined are designed to mirror the arrangements between PTL and PNGL, while also minimising the impact on both the Transmission and Distribution Code's respectively.

As the modifications to the Capacity section are for clarification purposes, firmus energy is fully supportive of the changes. The amendments to be applied to the Nominations section improve clarity for Suppliers and allow firmus energy Distribution to fulfil the requirements of the Proposed Distribution Network Code.

The proposed allocations process change outlines the requirement for written confirmation in order to change the Initial Allocation for two or more Shippers. This seems the most appropriate approach to changes in allocations between Suppliers to ensure consent is sought from all involved.

firmus energy believe this approach will allow the establishment of Supplier processes and put the best mechanisms in place to facilitate information exchange between the Transporter and firmus energy Distribution Limited.

I trust you find these comments useful.

Yours sincerely

*Mary*

Mary O'Kane

Transportation Services Manager