

27th January 2017

Tara O'Beirne,
The Commission for Energy
Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

Gas Safety Regulatory Framework for Ireland Gas Safety Case Guidelines for Natural Gas & LPG Licensed Undertakings – Consultation Paper – Reference CER/16/367

Dear Tara,

Gas Networks Ireland (GNI) welcomes the opportunity to comment on the Commission's proposed changes to the 'Gas Safety Regulatory Framework for Ireland Gas Safety Case Guidelines for Natural Gas & LPG Licensed Undertakings' as outlined in your consultation paper CER/16/367.

Please note GNI's comments below.

1. Third Party Ownership of CNG Equipment

GNI agrees that all Compressed Natural Gas (CNG) associated assets must be appropriately planned, designed, constructed, operated and maintained to ensure the safety of users, maintenance technicians and the public. GNI suggest that the wording of the document takes into consideration that third parties may own and maintain assets between the GNI Point of Delivery and the Forecourt owned and operated Dispenser.

The GNI Point of Delivery may be at the outlet of the Meter and management requirements should be consistent with existing downstream connections for both Transmission and Distribution Networks.

2. Emergency Arrangements

GNI agrees with the CER that appropriate emergency arrangements should be in place at each site. Currently GNI provides under licence, and the existing Safety Case regime, a National Response to Natural Gas Public Reported Escapes and this will be utilised for future CNG Natural Gas installations at Forecourts. Due to the potential for a number of different owners of assets in the CNG installation, GNI believe there should be one overall Site Specific Emergency Response Plan and this should be completed and managed by the Forecourt

Operator. If a different organisation has responsibility for the compressor they should be required to assist the Forecourt Operator in preparation of the CNG aspects of the Site Specific Emergency Response Plan.

3. Specific Requirements for CNG Supplier Undertakings

GNI welcome the introduction of a new specific part (Part I) in the CER safety case requirements to deal with the specific aspects of CNG operation. The reinforcement of requirements around the procurement of gas and meeting gas quality specifications within this new section is welcomed by GNI in terms of reinforcing shipper obligations and ensuring that GNI can deliver gas requirements to CNG exit points in line with the processes in place for existing gas exit points on the GNI network.

With regard to the requirement on the supplier to provide Safety Advice on CNG vehicle component/fittings, it is GNI's view that this responsibility should be on the vehicle manufacturer.

The remaining aspects of the new Part I outline specific requirements which are downstream of the GNI Point of Delivery, so these are best appraised by other parties in the CNG downstream chain (but as indicated earlier, the document needs to recognise the Forecourt Supplier may only own and maintain the dispenser).

Gas Networks Ireland is committed to ensuring the safety of the public, its employees, contractors, customers, visitors and all stakeholders affected by our gas operations on gas assets. We welcome this opportunity to liaise with the CER on this document with the shared goal of ensuring the safety of the Natural Gas Network.

I look forward to discussing the proposed changes in the near future.

Yours Sincerely,



Conor Ahern
Head of HSQE – Gas Networks Ireland