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20th September 2007

**Re: The Regulation of the Gas Installer Industry with Respect to Safety –
Proposed Vision. Consultation Paper CER/07/125.**

Dear Fiona,

Bord Gáis Networks welcomes the publication of the Commission's consultation paper on *The Regulation of the Gas Installer Industry with Respect to Safety*. The document provides both a detailed overview of current industry arrangements and a comprehensive vision of a new regulatory regime which will ensure the continued enhancement of safety in the installer industry.

We would like to put forward the following comments for consideration by the Commission;

1. Communication between the awarding bodies for qualifications / competency assessment and the Gas Safety Supervisory Body.

In the interests of ensuring an efficient and robust process for installer registration, consideration should be given to how the awarding bodies for Gas Installer qualifications and competency assessment certification might provide information to the Gas Safety Supervisory Body in relation to the relevant certification which they have issued to individuals.

Any practical or other barriers to such communication should be considered and addressed as part of the overall framework.

2. Conditions and obligations on installer companies / businesses

The proposed regulatory regime is rightly focused on the registration of suitable individual operatives working in the industry. However, it is also necessary for the regulatory regime to place appropriate conditions and obligations on the companies and businesses within the installer industry. For example the company

/ business should be required to; (a) Ensure that all employees working on gas are suitably insured, (b) that any trainees in the business are appropriately supervised by a full member and (c) that the company / business maintains appropriate records in relation to completion certificates etc.

3. Scope of the regulatory regime

In relation to the intended scope of new regulatory regime for gas installers and the legal requirement for registration, we would propose that the Commission would exclude Industrial Customer Premises and other similar facilities.

4. Branding of the scheme operated by the Gas Safety Supervisory Body

In relation the branding of registered gas installers and the promotion of the scheme operated by the Gas Safety Supervisory Body to the general public, we propose that the Commission give consideration as to who the appropriate party should be, to retain the rights to the branding used in support of the new regulatory regime.

Bord Gáis Networks would like to specifically welcome;

- a) The requirement for a formal competency assessment against I.S. 17024 on a periodic cycle in order to maintain membership and
- b) The emphases give in the vision document to public awareness. In particular customer / owner responsibility for maintenance of their natural gas installation.
- c) The setting of a specific date (1st January 2009) for the operation of the new regulatory model.

We look forward to the publication of the Commissions decision paper on the vision for the regulation of the installer industry. Bord Gáis Networks will continue to work closely with the Commission, Installer Representatives and the other interested parties in order to assist in the full implementation of the new regulatory regime.

Yours sincerely,

Stuart Williams
Safety & Quality Manager
Bord Gáis Networks