



**Bord Gais Energy Supply**

City Quarter,  
Lapps Quay,  
Cork,  
Ireland.

**Bord Gais Energy Supply “BGES” Comments on Options for the Gas Operational Regime consultation document.**

**Comments**

BGES welcomes the opportunity to comment on the above consultation paper and following consideration would like to make the following comments with regard to suggestions put forward for an Operational Regime in the proposed Common Arrangement.

BGES believes that above all, the most important elements of the Operational structure are to ensure a transparent, efficient and customer friendly system, one with a single unified Code of Operations and single IT interface, whereby Shippers can submit customer nominations and enable Capacity trading in both jurisdictions,

We believe therefore that the most suitable means of achieving these requirements is with the introduction and implementation of a single Transmission System Operator (TSO). The benefits of a single TSO over the other alternative options outlined in document we feel, are that it would enable a single point of contact for all Shippers in both jurisdictions, it would enable the most suitable and efficient method of balancing the system, it would facilitate the effective trading of Secondary Capacity and that it would encourage the most resourceful uses of the physical transportation assets by the TSO on behalf of the Shippers.

In addition to the above, we also believe that the introduction of a single Transmission System Operator is the structure most in line with the EU Third Package, which inevitably take precedence in the near future.

For these combined reasons we believe that a single TSO should be the option given most priority in arriving at an operational regime most in line with delivering the objectives of CAG most effectively

Please do not hesitate to contact us, should you require further clarity on any of the issues above

Best Regards,

Áine Spillane