

Tara Scully,
The Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

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7th March 2011

Re: CER/11/022 – Regulation of Gas Installers with respect to Safety Definition for the Scope of Gas Works with regard to Liquefied Petroleum Gas (LPG)

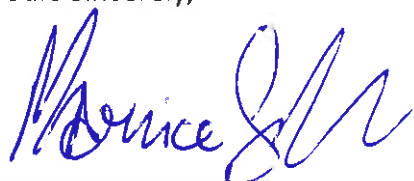
Dear Tara,

I refer to the CER's recent consultation paper outlining the proposed approach to scope of Gas works related to Liquefied Petroleum Gas and its direction "that post the enactment of these regulations; it will be an offence for a person to carry out gas works relating to domestic LPG unless he/she is registered with the GSSB".

BGN is broadly in favour of the proposal, but is concerned that in the course of carrying out its emergency response function under Condition 13 of the Natural Gas Distribution licence it can occur that its officers may need to take action to manage a leakage from a LPG installation. Therefore it is suggested that the permission to carry out gas work on domestic LPG installations is extended to a gas emergency officer appointed under section 9, as defined in the 2006 act.

BGN would welcome the opportunity to discuss this further with the Commission.

Yours Sincerely,



Maurice Scully
Regulatory Controls Manager