



Irish Offshore
Operators'
Association

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Mr Niall Riordan,
The Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

21st June 2013

Re: CER Consultation Paper 13/112 – Safety Case Fees

Dear Mr Riordan,

IOOA has reviewed the above referenced Consultation Paper and welcomes the opportunity to comment. We strongly believe that Option 2 (Actual Cost Recovery) presented in the Paper would be the most suitable basis for Safety Case Fee calculation. We believe this is the fairest and most transparent way of demonstrating the actual time and cost incurred by the CER for each Safety Case Assessment. This method will also allow benchmarking of CER costs against other agencies/jurisdictions.

We would also propose that the charging mechanism is reviewed after a suitable period of operation, when actual incurred costs are available.

If you have any queries in relation to the above, please contact me,

Yours sincerely,

Fergus Cahill,
Chairman, IOOA

Member Companies of IOOA: Chyrsoar E&P Ireland Ltd; ENI Ireland BV; ExxonMobil; Fastnet Oil & Gas (Ireland) Ltd; Lansdowne Oil & Gas; Providence Resources Plc; PSE Kinsale Energy Ltd; Repsol; San Leon Energy plc; Serica Energy; Shell E&P Ireland Ltd; Statoil.