

13<sup>th</sup> October 2014

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

File: Gov't/CER

Attn: Ms. Tara O'Beirne

**Re: Revised Natural Gas Storage Licence Consultation (CER/14/450)**

Dear Ms. O'Beirne,

We have reviewed the above referenced Consultation Paper and wish to comment as follows:

Proposed Condition 8.2:

*"The Licensee shall, subject to and in accordance with the Safety Framework, produce and thereafter maintain, in a form approved by the Commission, a document to be known as the Safety Case. The Licensee shall at all times fully implement and comply with its Safety Case. The Licensee shall continually monitor its compliance with its Safety Case."*

In the interest of clarity, we suggest that this clause is modified to include the following wording:

'Approval of a relevant Safety Case under the Petroleum Safety Framework (PSF) shall be deemed to fulfil the requirements of this condition 8.2'.

Proposed Condition 8.6:

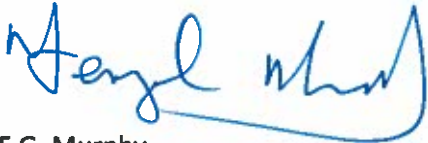
*"At such times as required by the Safety Framework, the Licensee shall procure, on terms of reference approved by the Commission, the services of an independent consultant suitably qualified in safety matters as approved by the Commission to examine and report on the Licensee's compliance with the Safety Case, such report to be concluded within a time period specified by the Commission and provided to the Commission at the same time as it is provided to the Licensee."*

PSE Kinsale Energy Limited request that this clause is deleted on the basis that the Safety Case for the Storage Facility will be reviewed in accordance with the requirements of the Petroleum Safety Framework and there is no need for a duplication of reviews.

We have no comment on any other of the proposed revised License conditions.

If you wish to discuss these comments in more detail please contact myself or M.V. Murray (mvmurray@kinsale-energy.ie).

Yours sincerely,



F.G. Murphy  
Chief Executive Officer