

9th November 2015

Tara O'Beirne,
Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

NG LPG Safety Case Guidelines – Consultation Document

Dear Tara,

Gas Networks Ireland (GNI) welcomes the opportunity to comment on the Commission's proposed changes to the Gas Safety Regulatory Framework Safety Case Guidelines as outlined in your consultation paper CER/15/211.

Please note GNI's comments below:

Comment 1:

A.6.1 Material Change

The list of changes which the CER may regard as material changes are extremely broad, in some cases do not appear to be risk based and if enforced would lead to excessive material change submissions with no clear benefit. For example "the commissioning or decommissioning of a transmission pipeline or pressure reducing installation" is noted as a material change however this is a regular and routine occurrence on the network, the risks of which are well understood and managed and would be considered as non-material by GNI. Changes to the responsibility of key safety staff and changes in O&M practice are also listed as material changes. Again this is overly prescriptive and does not allow for a risk based determination of the change and its materiality to be made. GNI request that this section be reviewed and revised to be less prescriptive and to allow for a risk based approach with the focus on significant changes.

Comment 2:

D.1. Introduction

Suggest the format for Section D.1. Introduction be made consistent with that in Section E.1. Introduction.

Comment 3:

D.4.4 New Connections

“The Safety Management System should provide a description of the control processes in place for ensuring that new connections to the transmission system, downstream distribution assets and other offtakes are installed in accordance with relevant Irish and International Standards before natural gas is supplied to them.”

GNI are of the view that new connections to downstream distribution assets should not be included in the Transmission Safety Case.

Comment 4:

D.4.12 Gas Safety Promotion and Public Awareness

GNI suggest “Meetings with landowners and local authorities” should be changed to “Liaison with landowners and local authorities” to reflect the variety of communication methods currently in use

Comment 5:

APPENDIX 2 – SUGGESTED KEY PERFORMANCE INDICATORS

SPI 1.3 and 1.12 are no longer relevant due to the completion of the cast iron renewals project.

Section 5 should be updated to reflect the role and responsibilities of the RGII. The Gas Transmission and Distribution Undertaking is not required to issue completion certs or perform inspections. This information should come from the RGII.

Gas Networks Ireland is committed to ensuring the safety of the public, its employees, contractors, customers, visitors and all stakeholders affected by our gas operations on gas assets. We welcome this opportunity to liaise with the CER on this document with the shared goal of ensuring the safety of the Natural Gas Network.

I look forward to discussing the proposed changes in the near future.

Yours Sincerely,



Brendan McCarthy
Safety Framework Manager – Gas Networks Ireland