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London  
WC2B 4AN

2<sup>nd</sup> August 2019

**Dear Mr Leighton,**

### **Implementing Regulation on Service Facilities – Consultation on ORR Guidance**

I am writing in response to the ORR's consultation on the Implementing Regulation on Service Facilities. I would like to thank you for the opportunity to review the proposed draft guidance. We find the proposed amendments useful and have no significant feedback to provide.

We understand that the guidance is made in general terms, with its intention being to provide a consistency of approach and to help interpret the requirements of the Regulation. We also acknowledge that this consultation does not include recent amendments to the NI Regulations (2019) and relates only to 2017/2177.

We have therefore made some general comments and notes below:

1. Can you confirm if there will be a further update to this ORR guidance, to take account of the 2019 amendments to the NI Regulations?
2. We observed some minor formatting issues - (a) there are 2 paragraphs labelled 3.21; and (b) the text in the diagrams in Annex A, B and C is not all visible.

Aside from these comments, we believe the guidance is clear on how the Implementing Regulation affects Northern Ireland.

Please contact me if you require any further information.

We look forward to receiving the final version of the guidance in due course.

**Yours sincerely,**



**John Glass**  
**Director of Infrastructure and Projects**