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10<sup>th</sup> Oct 2008

John Lynch,  
Analyst – Electricity Networks and Retail  
Commission for Energy Regulation,  
The Exchange,  
Belgard Square North,  
Tallaght, Dublin 24

Sarah Friedel  
NIAUR  
Queen's House  
14 Queen Street  
Belfast BT1 6ER

**Re: SEM Consultation paper SEM-08-121 entitled “Draft Transmission Loss Adjustment Factors for 2009” dated 15<sup>th</sup> September 2008.**

Dear John and Sarah,

This response is submitted on behalf of Coolkeeragh ESB (CESB) who wishes to thank CER and NIAUR for the opportunity to respond to this consultation paper. The only comment CESB wish to make it to again point out the fact that yet again CESB has been given the most punitive TLAF in Northern Ireland which adversely affects its competitiveness in the marketplace. While there may be genuine reasons for this such reasons are not known to CESB, and thus CESB kindly requests CER and NIAUR to act on its behalf to diligently ensure they are satisfied that the TLAF proposed for CESB, as for any other power station in the SEM, is fair and reasonable compared to other generators, and based on sound and objectively verifiable criteria.

Kind regards

*Derek Russell*

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**Derek Russell**  
**Commercial Manager, SEM**  
**Independent Generation, ESB International**

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