

Electricity Supply Board Clanwilliam House, Clanwilliam Court, Lower Mount Street, Dublin 2. Phone: 1850-372 372 Website: www.esb.ie

John Lynch, Commission for Energy Regulation, The Exchange, Belgard Sq. North, Tallaght, Dublin 24. Sarah Friedel, Northern Ireland Authority for Utility Regulation, Queens House, 14 Queen St., Belfast, BT1 6ED.

24th Nov. 2009

CONSULTATION PAPER: SEM/09/102

Draft Transmission Loss Adjustment Factors for 2010

Dear John/Sarah,

ESB Customer Supply (ESBCS) welcomes the opportunity to respond to this consultation paper seeking views on the proposed Transmission Loss Adjustment Factors for 2010.

We welcome the additional information attached in the appendices, especially the innovation of providing colour codes highlighting the changes in TLAF values between 2009 and 2010. It improves the transparency of what is a very complex process. In this regard ESBCS would welcome the inclusion of the aggregate losses and any high level explanation for trends in these figures from year to year.

With regard to the possible introduction of the new locational signals prior to the scheduled date of Q4 2010, this seems premature, as there is no pressing need to do so at present. Also, in view of the large amount of information to be considered in the SEM-09-060 document all participants should be given time to absorb the implications of the new regime on their operations. The consultation on locational losses methodologies was comprehensive and covered several alternatives in considerable depth. Given this

complexity we feel that the final decisions and implementation be given as much time as is feasible and should not be unduly rushed.

Yours sincerely,

Gerry McDonald, Energy Regulation, ESB Customer Supply.