

Meitheal Na Gaoithe,
42 Parliament St,
Kilkenny,
Ireland.

Tel. 00 353 56 7752111

Fax. 00 353 56 7752333

Email: info@mnag.ie



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John Lynch
jlynch@cer.ie
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Sarah Friedel
sarah.friedel@niaur.gov.uk
Northern Ireland Authority for Utility Regulation
Queens House
14 Queens Street
Belfast
BT1 6ER

Re: Transmission Use of System Charging: Methodology for All-island
Generation Tariffs SEM-08-067

Dear John and Sarah

Following consultation and feedback from our members the overall response from our organisation on your document is not only negative but questions the very basis on which both of your organisations would propose to create policies such as these - even if they are for public 'consultation'. At a time when both jurisdictions face extraordinary economic, environmental and energy security challenges it is incumbent on Regulatory Authorities to adopt policies that are in the long-term public good and create greater market certainty.

It is widely recognised that the inclusion of significant amounts of renewables will be beneficial and we believe that proposals such as those contained in SEM-08-067 run contrary to stated government policy as they create greater uncertainty in the market place for renewable energy generators.

We agree that the optimisation of the transmission system is required but we cannot see how this is achieved in your document. Sending 'signals' through a less than objective methodology creates the very uncertainty that should be avoided.

We propose that a fundamental review of this matter be undertaken in consultation with all stakeholders before issuing any consultation documents. The fact that this significant paper is published for comment with such a short response deadline during a period when traditionally many people take annual leave is also not helpful. I am aware that the IWEA has compiled a more comprehensive response on a point-by-point basis and we also fully endorse the points made in the IWEA submission.

Yours Sincerely

A handwritten signature in blue ink that reads "Thomas W. Cooke".

Thomas W. Cooke, Chairman