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Donna Hamill
NIAER
Queen's House
Upper Queen Street
Belfast BT1 6EQ

Market Operator Licences – EirGrid and SONI

Dear Ms Hamill

Thank you for providing us with the opportunity to respond on this consultation paper. This response is being submitted on behalf of ESBI's Independent Generation business and we have no objection to all or part of it being published by the Regulatory Authorities (RAs).

As mentioned in previous responses to consultations, ESBI appreciates the ongoing work by the two RAs on SEM licensing and trust that you will find our comments helpful. On the whole we are happy to see that the revised licences take account of many of the issues raised by market participants in the first consultation.

We still have concerns about the delay in Viridian's divestment of SONI to 2008 and take the view that this should happen before Day 1 of the SEM. We would also like more clarification on how the contractual joint venture will work and how the SMO's performance indicators will be defined and the performance will be measured as the two licences differ in some respects.

Please don't hesitate to contact me if you require any clarification.

Kind regards



Deirdre O'Hara

Commercial Manager, Independent Generation
ESB International