



Billy Walker,
Northern Ireland Authority for Utility Regulation,
Queens House,
10-18 Queen Street,
Belfast,
BT1 6ED.

25th July 2011

Re: Imperfections Charges from October 2011 – September 2012 – SEM-11-054

Dear Billy,

Endesa Ireland welcomes the opportunity to respond to the Consultation Paper on Imperfections Charges from October 2011 – September 2012.

Endesa Ireland considers that the scale of increase in imperfections charges is extreme and final customers cannot be expected to absorb such increases in charges year on year.

The cost of fuel is a key part of DBC and it is said to be outside the control of the TSOs. Endesa Ireland submits that this risk could be mitigated by hedging the fuel price and considers that the TSOs should be required to do so. Such a scheme would provide certainty to customers and would avoid sudden shock increases in imperfections charges.

Please don't hesitate to contact me should you wish to discuss any aspects of this response.

Regards,

A handwritten signature in blue ink that reads 'Deirdre Powers'.

Deirdre Powers
Director, Energy Management