

**Clive Bowers
Commission for Energy Regulation,
The Exchange,
Belgard Square North
Dublin 24**

11 July 2012

Dear Clive,

Re: Terms of Reference for the 2012 Market Audit Consultation Paper (SEM-12-041)

Power NI welcomes the opportunity to respond to the above consultation. The market audit provides an important assurance to participants and has highlighted issues requiring attention.

Power NI believes that the expansion of scope in the 2010 and 2011 market audit was a useful exercise. These audits provided important additional insight, assessment and assurance regarding the processes in place.

Mindful of the cost implications, Power NI considers the limited expansion to cover key MDP data feeds as appropriate. While maintaining the assessment of SEMO, this facilitates an additional review of key interfaces and provides the market with a high level view of the critical data processing activities.

The implementation of the IDT project is clearly a significant milestone and risk for the market. An early examination of the operation of IDT would also appear to be a prudent activity.

Power NI welcomes the Regulatory Authorities intention not to duplicate work by considering existing audit arrangements and how they could be used by the SEM auditors.

Please do not hesitate to contact me should you wish to discuss this question further.

Yours sincerely,



William Steele
Power NI