



Electricity Supply Board

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CONSULTATION PAPER: SEM/08/121

Draft Transmission Loss Adjustment Factors for 2009

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 2009.

We welcome the additional information attached in the appendices. It improves the transparency of what is a very complex process. We must point out that while the Loss Factors are calculated on an All Island basis the actual payment for losses is still on a jurisdictional basis. This creates a distortion in economic signals, and we are pursuing this issue with the Regulatory Authorities and through the Modifications Committee. The consultation paper indicates that the loss factors are around 1.8% in aggregate. This seems low by historic standards and we would welcome a fuller explanation of this figure. We would also welcome more information on the actual losses in each jurisdiction to facilitate a fair apportionment of the costs to customers.

Yours sincerely,

Gerry McDonald,
Energy Regulation,
ESB Customer Supply.
