

Jamie Burke	Billy Walker
CER	Utility Regulator
The Exchange	Queens House
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Friday, 13th August 2010

Re: Proposed RAs option for all-island harmonised Transmission Loss Adjustment Factors (TLAFs)

Jamie/Billy

SWS Energy (SWS) welcomes the opportunity to respond to your proposed decision paper. SWS fully support the proposed decision to apply uniform losses from 1st October 2010.

SWS very much remain of the view that the current TLAF system is defunct, with detrimental consequences on project financing and viability that could result in failure to meet government's 2020 targets. SWS therefore consider that immediate action by applying uniform losses from 1st October is now critical. Additionally SWS believes that the RAs and market participants have undergone a thorough consultation process, where the overwhelming general consensus is that the current process has to change and we see this as the application of uniform TLAFs from 1st October 2010.

We are available to visit either Authority or system operator to further discuss our views.

Regards,

Margaret Riordan

SWS Energy