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12<sup>th</sup> December 2012

Access Rules and Charging Methodology Statements for EirGrid Interconnector Limited (EIL) and Moyle Interconnector Limited (MIL) respectively

Dear Mr. Bowers,

This response is on behalf of ESB in relation to the Report on the Curtailment Approach in relation to the Moyle and East-West Interconnectors published on the 13th November 2012.

We are firmly in agreement that Moyle and EWIC should only auction forecast available capacity and should not auction capacity that is unavailable due to a curtailment. This is in line with the BritNed and IFA interconnectors. If capacity has been purchased by participants, this obligation should be fulfilled by the interconnector owners before selling any more capacity at auction. Otherwise it devalues long term capacity and disincentives people from buying it.

We are also in agreement that in situations where curtailment of sold capacity is required on the Moyle and EWIC, all of the capacity which has been sold should be curtailed on a pro-rata basis and no differentiation should be made between longer term capacity holdings and shorter term capacity holdings.

In October 2011 new Access Rules were approved by the respective regulators for the Moyle and EWIC. These Access Rules were developed in accordance with EU legislation and aligned where possible, with the Access Rules of other FUI and GB interconnectors. We believe these rules are fair, transparent and compliant with EU regulation.

Yours Sincerely,

Karol O'Kane  
Regulatory Analyst