

Sean Mac an Bhaird,
Commission for Energy Regulation,
Plaza House,
Belgard Road,
Tallaght,
Dublin 24.

20th March 2006

Re: CER Consultation Paper 06/018 "Disclosure of Information to Final Customers by Suppliers"

Dear Sean,

Sustainable Energy Ireland's (SEI), Energy Policy Statistical Support Unit (EPSSU) was established to deliver on the remit of SEI in respect of the development, collation, analysis, publication and maintenance of national energy statistics, indicators and trends.

SEI welcomes the opportunity to comment on the issues raised in the Disclosure of Information to Final Customers paper (CER/06/018) and we are pleased to offer these brief high level comments. We have confined our comments to the section 2.3.4.

2.3.4 Information to be provided

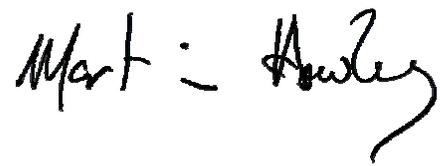
In relation to energy source categories the renewable category should be further split into hydro, wind, biogas, biomass, solar etc. These are very different energy sources and require disaggregation because some are zero or near zero emissions (non combustible sources such as solar, hydro, wind etc) and others have emissions associated although may be carbon neutral (biomass, biogas, wastes etc).

Also with regard to categories of energy sources, it should be possible to distinguish what portion of the source is generated indigenously or is imported. Presentation of this information could be achieved by showing the amount of the energy source that is imported in brackets. Eg, X% (y%) where X% is the total percentage of electricity supplied sourced from the particular fuel and y% represents the percentage of the electricity supplied of which imported from the same fuel.

In addition Article 3(2) of the Directive 2003/54/EC (transposed under Regulation 22 of SI 60 of 2005) requires that Public Service Obligations shall be imposed in a non-discriminatory and transparent manner. In this regard, SEI recommends that an additional column be inserted on the Disclosure Label indicating the percentage breakdown by energy source of the PSO Levy in the "applicable period".

Should you have any queries with regard to the above or if you wish to discuss please do not hesitate me (01 8082041).

Yours Sincerely,

A handwritten signature in black ink that reads "Martin Howley". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Martin Howley
Energy Policy Statistical Support Unit
Sustainable Energy Ireland