



**Tara Scully**  
**Commission for Energy Regulation**  
**The Exchange**  
**Belgard Square North**  
**Tallaght**  
**Dublin 24**

**14 March 2008**

**RE:** CER Review of Public Consultation Process

Dear Ms Scully,

The IBEC Energy Policy Committee (EPC) welcomes the opportunity to submit comments regarding the Commission for Energy Regulation's *Proposals for Improvement of the CER Consultation Process*. As Ireland's leading representative body with 7000 members, the IBEC EPC represents the business community on energy affairs and includes companies ranging from conventional power generation and large scale energy consumers to those providing renewable solutions and energy services.

Energy is a cornerstone of Ireland's economic prosperity and is undergoing a period of significant change primarily driven by climate change and fuel security concerns. Coupled with market liberalisation the energy sector has seen significant increases in final energy costs. This had been particularly acute for Irish consumers who have experienced average increases over the past decade of 5.2 percent per year over the decade to 2007, significantly higher than the EU-15 average of 2.95 percent.

With secure, competitive and environmentally sustainable energy supply top of the policy agenda an ever increasing range of interested parties are considering this often complicated and technical agenda. Delivering better regulation, accessibility and understandability of energy issues for a diverse audience will be an ever increasing challenge for the Regulatory Authority. To this end IBEC welcome the proposals in this consultation paper and commend the CER for its endeavors to improve the consultation process and engage with all stakeholders. In addition to the proposed improvements covered by the consultation paper IBEC would like to make the following observations:

### **Stakeholder Engagement**

In seeking to improve the engagement of stakeholders in the regulatory decision process the CER must be mindful of its **target audience**. Frequently, those seeking to engage in the process, particularly consumers, find it difficult to discriminate between consultations of relevance/significance to them and those which are not. It would be important to note in the consultation summary page, who the CER believe a consultation is most **applicable** to. Having identified the target audience the next challenge is that of **understandability**. Regulatory affairs are often complex and technical for those not familiar with market structures or nuances so it can be difficult for some stakeholders to penetrate the information. In terms of consultation summaries simple, bulleted, clear messages would be useful.

### **Analysis of Options**

Often regulatory consultation papers present a number of potential options or directions for stakeholders to consider. In presenting various options it is imperative that the CER details **analysis** that includes the likely **impact** of a potential option, for example, effect on supply security, price, portfolio investment etc. In understanding the likely impacts stakeholders may make a more informed contribution on their preferred outcome.

### **Consultation Discussion Group**

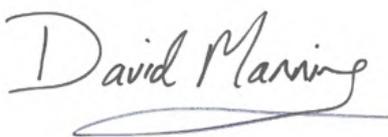
IBEC welcome the proposals for a quarterly consultation discussion group and would be happy to participate in such fora. For many organisations with limited resources advance notice of consultations and relevance to them will allow stakeholders to schedule time to prepare informed and considered responses. IBEC would, however, like to note caution regarding the use of open fora as a replacement for consultation documents referred to in point 3.1.1. IBEC believe that any fora should be used as a precursor to or support of a written document.

### **Website**

The use of the internet has become an integral part of corporate communication strategies. IBEC welcome the redesign of the CER website in 2007 and the email alerts function available but agree as indicated in the consultation document that the accessibility of consultations and archived documents can be difficult. We would encourage the CER to commit resources to improving the accessibility of the website as a core communications tool.

As Ireland's leading business representative body IBEC is committed to working along side the CER to deliver a stable and competitive electricity market in Ireland and look forward to working with the CER, further improving its communication processes and facilitating stakeholders in making meaningful and considered contributions to CER consultations.

Yours sincerely,

A handwritten signature in cursive script that reads 'David Manning'. The signature is written in dark ink and is positioned above a horizontal line.

David Manning  
Secretariat, IBEC Energy Policy Committee