

Mr Fergus O'Toole  
Commission for Energy Regulation  
Plaza House, Belgard Road  
Tallaght  
Dublin 24

24 August 2009

Re: CER/09/125, Proposed Decision on ESB PES Tariffs, 1 October – 30 September 2010 and CER/09/124

Dear Fergus,

I am writing to you on behalf of IBEC's Large Energy Users Working Group (LEUWG), which provides a collective voice for the main industrial energy consumers, for whom competitive energy is pivotal. Business consumers account for 62.5% of the total consumption in the Irish electricity retail market, with Large Energy Users (LEU) accounting for 27% of total electricity at a cost of nearly €1 billion.

In contrast to other EU countries, industrial electricity prices are disproportionately high relative to the EU average, whereas our domestic prices are generally below the European average. Recent Eurostat data indicates that Irish industrial prices were 26% above the EU-15 average and among the highest recorded in the EU<sup>1</sup>.

The Group acknowledges the welcome decision to extend the rebate scheme for LEU consumers in light of the current economic climate and the need to protect competitiveness (CER/09/117 of 27 July 2009).

While international fuel costs are outside our control, there is a need to promote energy efficiency, support competition in the energy market and address the energy infrastructure deficit. The Group would like to request a meeting with the Commission to examine how the recommendations in CER/09/117, including a sustainable and equitable re-profiling of costs, can be progressed.

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<sup>1</sup> Eurostat data on industrial electricity prices, 2008

*the voice of irish business and employers*



Should you wish to discuss any of the points mentioned in this document, please contact Erik O'Donovan, secretariat to the IBEC Large Energy Users Working Group, tel. 01-6051672, email : [erik.odonovan@ibec.ie](mailto:erik.odonovan@ibec.ie).

Kind regards

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Tadg Farrell  
Chairman, Large Energy User Working Group, IBEC