



Safety before LNG
Protecting the Shannon Estuary and its people

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15 March 2012

Mr. Stuart Coleman,
The Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

Re: SBLNG submission on the regulatory treatment of the BGÉ Interconnectors

Dear Mr. Coleman,

We welcome the CER’s proposed decision as outlined on February 17th 2012 with the following high-level comments:

If there is to be a significant difference between the proposed and actual decision to be made by the CER then we believe that this should go back to public consultation once more, especially if this is to be to the advantage of Shannon LNG.

We are concerned with concerted lobbying by local Kerry-based politicians to try and force Minister Rabbitte to give a direction to the CER which would be favourable to Shannon LNG but against consumer interest. We note that the Minister has no right to do this under section 10A 6 of the Electricity Regulation Act 1999 as amended and as he himself outlined in the Dáil on March 7th 2012.¹

We believe that any final decision by the CER should have as prime goals the consumer interest with no barriers to fair competition between different suppliers into the Irish market and that the cost of the interconnectors should be shared out among all suppliers proportional to their market share.

We are especially concerned that none of the Shannon LNG assets should become part of the Transmission System’s Regulatory Asset Base which would amount to indirect state aid to the proposed LNG terminal because Ireland already has access to LNG via the UK market.

Yours sincerely,

Johnny McElligott

¹ <http://www.kildarestreet.com/wrans/?id=2012-03-07.985.0>