



Re: CER-12-013 – The Regulatory Treatment of the BGE Interconnectors

Endesa Ireland welcomes the opportunity to comment on the Proposed Decision Paper on the regulatory treatment of the BGE Interconnectors.

Endesa Ireland notes that the draft decision does not make detailed proposals:

- as to whether reserve tariffs should be based on LRMC or SRMC, and the methodology for calculating either,
- on how common charging would be implemented where entry exit revenues are not recovered on a 50:50 basis, and
- on the resultant differentials between LRMCs at entry points.

In as much as the draft decision proposes to remove the differentiation between onshore and offshore tariffs Endesa Ireland tentatively supports the proposal, given the difficult circumstances. However, the issues listed above must be resolved; until further details are provided, it is not possible to fully assess the proposal.

Endesa Ireland calls on the regulator to ‘flesh out’ the proposal made in the draft decision paper and requests that an opportunity to comment on the full proposal be given to market participants prior to any decision being taken.

If Moffat is to be the entry point to the Irish system, Endesa Ireland queries whether there is then an interface between the Irish and Northern Irish Gas systems, as well as the Isle of Man System. It would seem as though gas provided to SNIP travels over part of the Irish transmission system.