



Jerry MacEvilly,  
Commission for Energy Regulation,  
The Exchange,  
Belgard Square North,  
Dublin 24.

6<sup>th</sup> July 2012

**Re: CER/12/075 – 2012/13 Tariffs for Short-Term Capacity and Transmission Exit Capacity Transfers**

Jerry,

Endesa Ireland welcomes the opportunity to respond to the CER's Consultation Paper on *2012/13 Tariffs for Short-Term Capacity & Transmission Exit Capacity Transfers*.

Endesa Ireland considers that the reduction in summer multipliers discriminates in favour of seasonal users and against those using the transmission system year-round, particularly in Winter. Storage in Ireland is extremely limited and is not available to all shippers. The existing storage licence holder in Inch is not required to offer third party access basis.

The reduction of the summer multiplier in order to encourage use of seasonal storage discriminates in favor of those shippers with access to storage, which is not made available to all shippers in Ireland.

On this basis we consider that the proposals contained in CER/12/075 regarding summer multipliers should not be implemented.

If you have any queries on this response please do not hesitate to contact me.

Regards,

A handwritten signature in blue ink that reads 'Marian Troy'.

Marian Troy  
Markets and Regulatory Analyst