

# EIRGRID INTERCONNECTOR DAC

Lucy Cradden  
The Commission for Regulation of Utilities  
The Exchange  
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**Dear Mrs Cradden**

We note the most recent consultation on draft text for an Interconnector Operating Licence for an interconnector operating with a Cap and Floor regime.

In particular as set out in your consultation note, we acknowledge the appropriate requirement to amend the licence text in order to remove “legislative references that are no longer applicable”. These required changes arise due to the departure of the UK from the European Union (EU).

EIDAC notes that the proposed changes to Licence Conditions are appropriate and resolve non-applicable legislative references in the draft Licence text.

However we would like to draw attention to proposed amendments to the definition of “Interconnector Revenue” under Condition 1.

Clause b) of the definition of “Interconnector Revenue” now refers only to revenue arising from the “sale of long term transmission rights” and deletes reference to the future remuneration of rights holder when these rights are sold in the form of a Financial Transmission Right (FTR).

We suggest that the definition could be amended to allow for this future obligation e.g. “*from the proceeds of trade on any applicable mechanism for the sale of long term transmission rights and any associated remuneration* [changes underlined]”.

I remain at your disposal should you have any questions in relation to this proposed amendment.

Yours faithfully,  
[sent by email and accordingly bears no signature]

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Fergal McParland  
Commercial Manager  
EirGrid Interconnector DAC

Cc. John Ging, Head of Interconnection, EirGrid  
Margaret McCarthy, Group Regulation, EirGrid