



***Response to NIAUR Consultation on Electricity Licence Fee
Methodology***

on behalf of AES

(incorporating AES Kilroot Power Ltd and AES Ballylumford Ltd)

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Introduction

AES Kilroot Power Limited and AES Ballylumford Ltd (formerly Premier Power Ltd) (collectively “AES”) welcome the opportunity to respond to the Consultation on Electricity Licence Fee Methodology.

Comments

AES recommends the adoption of Ofgem’s licence fee methodology which recovers the annual allowable cost of regulation from Transmission & Distribution. AES believes this to be the most efficient methodology taking into account the identified considerations of cost reflectivity, licence usage, the increasing number of generators, transparency and harmonisation.

AES would not support the adoption of CER’s methodology as it considers the increased administrative burden to significantly out way any benefit of having a similar methodology.