



The Consumer Council

Elizabeth House,
116 Hollywood Road,
Belfast BT4 1NY
Tel 028 9067 2488
Fax 028 9065 7701
e mail info@consumercouncil.org.uk

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Ref: PD20010549

Simon Scott
Utility Regulator
Queens House
14 Queen Street
BELFAST
BT1 6ER

Dear Simon,

Re: Consultation on Vacant Sites within the NIE Land Bank

The Consumer Council is a Non-Departmental Public Body set up in legislation to safeguard the interests of all consumers, and particularly the vulnerable and disadvantaged. The Consumer Council is an independent organisation which operates to promote and protect the consumer interest.

We welcome the opportunity to respond to this consultation on vacant sites within the NIE Land Bank.

It is the position of the Consumer Council that any change, release or sale/disposal of vacant sites within the NIE Land Bank should be to the benefit of the consumer. Any profits from asset management/surplus disposal should return a benefit to consumers either through their bills or re-investment into the electricity distribution and transmission network.

The Consumer Council would insist that any decision made provides benefits to consumers and represents the least risk at the lowest cost.

The Consumer Council is aware that a number of sites are now not suitable for electricity generation. Therefore it may be appropriate to release these sites for alternative uses. Any asset sales require the permission of the Utility Regulator and therefore are restrictive, safeguarding the disposal of land where efficiency targets have not been met.

Those sites suitable for electricity generation should be considered in line with DETI's Strategic Energy Framework (SEF). Future energy policy will place

increasing importance on renewable electricity generation. It is therefore important that any decision is made in line with future energy and sustainability policy. Security of electricity supply in Northern Ireland needs consideration, selling this land now may result in future supply problems if existing generation stations become decommissioned or unusable.

The Consumer Council would like assurances from the Utility Regulator that a full cost-benefit analysis will be carried out before any decisions are made and that any decision will be the most beneficial option for the consumer.

In terms of the criteria it is important that proposals are consistent with the SEF. The benefit to consumers should be clearly outlined in each proposal along with any associated costs. The highest rental offer should only be considered as a selection criteria, if the rent received above costs will result in benefits to consumers through reduced bills or through reinvestment in the transmission and distribution network.

The Consumer Council would like to raise the following points for the Utility Regulator to consider when coming to its decision:

- To keep in mind that its primary objective of any change is to protect the Northern Ireland consumer;
- To consider how the targets for renewable energy within DETI's SEF are likely to impact on the long term future of generating plants in Northern Ireland, particularly fossil fuel plants;
- To consider how emission limitations within the Large Combustion Plant Directive will affect current generation in Northern Ireland;
- To consider how ownership of these sites will be impacted upon by the imminent takeover of NIE by ESB;
- To consider how the planned north/south and east/west interconnectors, and any plans for further interconnection may impact on any decision;
- To consider how the potential sale of power plants in Northern Ireland could impact on the future balance within the electricity market.

I hope that these comments are helpful and are given due consideration. Please contact me if you require any clarification.

Yours Sincerely,

Andrew Murray
Senior Consumer Affairs Officer