



**Electricity Supply Board**

Clanwilliam House, Clanwilliam Court, Lower Mount Street, Dublin 2.

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Paul Bell/Kenny Dane,  
Utility Regulator,  
Queen's House,  
14 Queen Street,  
Belfast, BT1 6ED.

27th January 2010

**CONSULTATION PAPER**  
**Generator Unit Agreement – Relevant Considerations**

Dear Paul/Kenny,

ESBCS welcomes the opportunity to respond to this consultation and notes that the Utility Regulator intends consulting further on this issue later in the year.

ESBCS encourages the Utility Regulator to proceed with the economic analysis as set out in the consultation and to share the outcomes with the market.

ESBCS notes that this current consultation will close on 27th January with a further six week consultation starting in March 2010. While this consultation timeline has been drafted to ensure that the Utility Regulator can serve sufficient notice of early cancellation of the contracts if required, it does not appear to consider the possible impact on the NDC auction window. It is possible that NIEPPB will not be able to offer NDC hedges backed by the eight generating units whose Earliest Cancellation Date is 1st November 2010 until a decision on early cancellation is made. ESBCS seeks immediate clarification from the Utility Regulator on the impact that this process will have on the timeframe for the NDC auctions that may be held by NIEPPB.

Yours sincerely,

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Gerry McDonald,  
ESB Customer Supply