



Energy for  
generations

## Generation & Wholesale Markets

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Dear Elena

### **Utility Regulator Draft Corporate Strategy 2014-19 and FWP 2014-15**

ESB Generation and Wholesale Markets (ESB G&WM) welcomes the opportunity to respond to the UR's draft corporate strategy and forward work programme, published 20 December 2013, and the open and transparent process used in its development.

In particular, ESB G&WM appreciates the workshops and briefings provided, which allowed exploration of UR's thinking on key initiatives and sharing of stakeholder feedback.

We also welcome UR's ongoing commitment to openness and engagement with stakeholders.

We note the lack of a specific project under Strategy Objective 3 (*Protecting the long-term interest of business and domestic customers*) relating to monitoring and engagement with DECC on EMR implementation, to ensure that specific issues in Northern Ireland are taken into consideration.

ESB G&WM holds a strong view that Northern Ireland should suffer no disadvantage in the roll out of EMR, and has responded to DECC in the past in this manner. Furthermore, we worked closely with DETI and industry towards achieving the derogation of the Carbon Price Floor for Northern Ireland. Therefore, we suggest that UR considers the inclusion of a project relating to continuing engagement with DECC on EMR implementation in the Northern Irish context.

Yours sincerely

Declan O'Brien

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