

Simon Scott Utility Regulator Queens House 14 Queen Street Belfast BT1 6ED

26/11/10

Re: Consultation on Electricity Licence Fee Methodology

Dear Simon,

firmus energy thanks you for the opportunity to respond to the above consultation.

firmus energy would agree the current methodology for determining electricity licence fees. Of the four options presented in the consultation paper, firmus energy favours option 1 whereby:

Make a determination to apply from 2011/12, applying the methodology used in the current interim determination which includes:

- allowing for the issue of licence fee invoices at the start of the financial year and subsequent adjustment later in year and in the following financial year
- setting the de-minimis annual fee amount for "dormant" licences at £1500, (to increase annual based upon the Retail Price Index (RPI)) thus aligning this fee across directorates within the Utility Regulator

I trust you find these comments useful.

Yours sincerely

Michael

Michael Scott Head of Business Development