



Julián Martínez-Simancas  
General Secretary and Secretary of the Board of Directors

Bilbao, May 16, 2011

**To the National Securities Market Commission**

**Re.: Periodic information about the share buy-back program of IBERDROLA, S.A.**

Dear Sirs,

Reference is made to our notice of significant event (*comunicación de hecho relevante*) of March 14, 2011 (official registry number 140,130), relating to the share buy-back program of acquisition of own shares approved by the Board of Directors of IBERDROLA, S.A. (“Iberdrola” or the “Company”) in accordance with the authorization conferred by the General Shareholders’ meeting held on March 26, 2010 (the “Share Buy-back Program”), as partially amended by our notice of significant event (*comunicación de hecho relevante*) of March 22, 2011 (official registry number 140,498).

Pursuant to Section 82 of Law 24/1988, of July 28, on the Securities Market (*Ley 24/1988, de 28 de julio, del Mercado de Valores*) and related provisions, and in accordance with the provisions of article 4.4 of the Commission Regulation (EC) No 2273/2003 of December 22, 2003, we hereby inform you that between May 9 and May 13, 2011, the Company has carried out the following transactions over its own shares under the Share Buy-back Program:

| Date       | Security | Transaction | Number of titles | Price (€) |
|------------|----------|-------------|------------------|-----------|
| 05-09-2011 | IBE.MC   | Acquisition | 2,600,000        | 6.153     |
| 05-10-2011 | IBE.MC   | Acquisition | 3,000,000        | 6.176     |
| 05-11-2011 | IBE.MC   | Acquisition | 2,300,000        | 6.217     |
| 05-12-2011 | IBE.MC   | Acquisition | 2,750,000        | 6.162     |
| 05-13-2011 | IBE.MC   | Acquisition | 2,767,673        | 6.140     |

Please be advised of all of the foregoing for such purposes as may be appropriate.

Yours truly,

General Secretary and Secretary of the Board of Directors

NOTICE. This document is a translation of a duly approved Spanish-language document, and is provided for informational purposes only. In the event of any discrepancy between the text of this translation and the text of the original Spanish-language document which this translation is intended to reflect, the text of the original Spanish-language document shall prevail.

## **IMPORTANT INFORMATION**

This communication does not constitute an offer to purchase, sell or exchange or the solicitation of an offer to purchase, sell or exchange any securities. The shares of IBERDROLA, S.A. may not be offered or sold in the United States of America except pursuant to an effective registration statement under the Securities Act or pursuant to a valid exemption from registration.

NOTICE. This document is a translation of a duly approved Spanish -language document, and is provided for informational purposes only. In the event of any discrepancy between the text of this translation and the text of the original Spanish -language document which this translation is intended to reflect, the text of the original Spanish -language document shall prevail.