



Lisdowney Wind Farm Ltd.

Ballyconra
Ballyragget
Co. Kilkenny
T – 087 7592166

13-5-2011

RE: Response To Consultation

Jamie,

There are a number of issues being discussed in the consultation but I have focused on making comments on the proposals to reduce the threshold from 10 MW to 5 MW.

See below some comments you can include in your submission.

- The current policy of generators less than 10 MW not being charged TUoS has been in place since 2000 in RoI and not 2007 as referenced in the System Operators (SOs) document. Projects in the sub 10 MW range have proceeded with financial models without TUoS charges on the basis of this policy. Any change to this policy would be a retrospective change. Retrospective changes to policies should only be made where there is a very compelling case.
- The changes of policy proposed should also be weighed against the materiality of the issue being raised. There are only a relatively small number of projects in the range 5-10 MW. From a review of all connected, contracted and Gate 3 projects in RoI, only 2% of the total installed capacity is in this range. When the first 5 MW is disregarded only 0.7% is in this range. Bringing only another 0.7% of capacity into the net for TUoS charging is not material to justify a retrospective change to an existing policy.
- The Lisdowney windfarm is embedded into the distribution system. It is connected to the local 38 kV substation that is fed from Portlaoise 110 kV substation. We are also located in an area where there is very few connected, contracted or Gate 3 generation. The total potential exported capacity from the distribution connected generation is less than the summer minimum demand at Portlaoise. Our windfarm is a typical example of a renewable projects in the range 5-10 MW which is embedded into the distribution system.



An Roinn Gnóthaí Pobail,
Comhionannais agus Gaeltachta
Department of Community, Equality
and Gaeltacht Affairs

Directors: Matthew Bergin, James Carville, Thomas McEvoy.
Company: Registration No. 480019.



Lisdowney Wind Farm Ltd.

Ballyconra
Ballyragget
Co. Kilkenny
T – 087 7592166

- The example provided in the SO paper is a relatively extreme example of how generators can impact on the transmission system. There does not appear to be balance within the SO paper to recognise the system benefits provided in many cases by embedded generation. Before any decision is made to reduce the threshold we would request more detailed analysis should be provided by the system operators considering all generators in the range 5-10 MW.
- This proposed change in policy also does not appear to align with the policy to encourage embedded generation. The EC Renewables Directives (2001/77/EC & 2009/28/EC) and the Electricity Market Directive(2003/54/EC) place obligations on Member States and their network operators in terms of their treatment of embedded generation. Included in these directives is a requirement for non-discriminatory charging policy with respect to energy from renewable sources.

Regards,

James Carville
Project Manager
Lisdowney Wind Farm Ltd.



*An Roinn Gnóthaí Pobail,
Comhionannais agus Gaeltachta
Department of Community, Equality
and Gaeltacht Affairs*

Directors: Matthew Bergin, James Carville, Thomas McEvoy.
Company: Registration No. 480019.