

**Tullynamoyle Windfarm Ltd's Response to the Regulator's
Authorities Consultation on Locational Signals Project: All-island
Generator TUoS, SEM-11-018**

4e6h83geLtd (TWL) welcomes the opportunity to respond to the RA's consultation on Generator TUoS charging.

TWL is developing a 9 MW wind farm in Co. Leitrim. The project received a connection offer in Gate 2 and will be energised in June 2011.

We have detailed below comments on the proposal to reduce the threshold for TUoS charging from 10 to 5 MW. We are strongly opposed to the retrospective change to policy without a material level of justification.

Distribution Connected Generators TUoS – Threshold Level

- 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 change 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 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.