



SEM Committee,  
c/o Commission for Energy Regulation,  
The Exchange,  
Belgard Square North,  
Tallaght,  
Dublin 24.

22<sup>nd</sup> October 2012

By email to: [jburke@cer.ie](mailto:jburke@cer.ie)

Re: Response to the:  
**"Treatment of Curtailment in Tie-Break situations ", SEM-12-090 – Proposed Decision Paper**

Dear SEM Committee members,

Wind Prospect welcomes the opportunity to comment on the Proposed Decision Paper on the treatment of Curtailment in Tie-Break situations. Wind Prospect welcomes the proposed decision by the SEMC in choosing a pro-rata approach with a defined curtailment limit.

Wind Prospect would like to take this opportunity to commend the SEMC for recognising that a number of assumptions within the original SEM-11-105 were deficient.

In particular Wind Prospect would like to further commend the SEMC for adopting recent evidence which has come to the fore with respect to the effect curtailment by reference to FAQ will have on the renewable energy industry and in particular the inability of this method of allocating curtailment to meet the five criterion identified in SEM -12-028.

The proposed decision will facilitate the build out of non-firm wind generation enabling Ireland to meet their 2020 renewable targets while pro-rata curtailment also provides an efficient entry signal into the market as opposed to the prohibitive entry signal provided under a grandfathering by FAQ scenario. By default and as observed by the majority of responses from financial institutions to SEM-12-028 consultation paper, a stable investment environment is created through the decision to curtail future generation in the same manner as existing generation.

Wind Prospect would also like to take this opportunity to remind the SEMC that mitigating curtailment is crucial to realising Ireland's renewable penetration potential. Work streams such as DS3 and decreasing the level of must run generation and efficient use of EWIC must be expedited, with market participants encouraged and rewarded for providing services which reduce curtailment.

Yours sincerely,

Ciaran Donnelly BE CEng MEM MIET