

# *NORTH WEST WIND LTD.*

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Commission for Energy regulation,  
The Exchange,  
Belgard Square North,  
Tallaght,  
Dublin 24.

11<sup>th</sup> November 2010.

**Re.: Submission to “Principles of Dispatch and the Design of the Market Schedule in the Trading and Settlement Code”.  
SEM – 10 – 060.**

Dear Sir or Madam

North West Wind Ltd. (“NWWL”) owns and operates a 7.65MW windfarm in North West Donegal. The windfarm is known as Loughderryduff Windfarm, and the windfarm went into operation during the summer of 2008.

NWWL applied for a grid connection offer in 2003 and subsequently received a Gate 1 Grid Connection Agreement. With the Gate 1 Grid Connection Agreement, was the possibility of connecting with a Non-Firm grid capacity. To ensure financing in terms of bank debt, promoter equity and BES funding, the non-firm capacity needed to be quantified. This was subsequently quantified in a Constraint Report issued by Eirgrid/ ESB Networks. For Loughderryduff windfarm and other Gate 1 windfarms connecting to the Binbane Node in North West Donegal, the Constraint report stated ½ % Constraint. NWWL financial model was based on this maximum constraint level of ½%. For Gate 2 the constraint level for Donegal was around 14%; and we understand only one controllable Gate 2 windfarm has been built in Co. Donegal.

Having read the SEM Committee “Proposed Position Paper and Request for Further Comment SEM-10-060” I believe it is imperative that already operating windfarms like Loughderryduff windfarm, (which for example has bank borrowings currently in the order of €8 million) are not put into financial jeopardy whereby the Regulatory Authorities introduce a new set of operational rules which then negatively impact existing wind farms. Regulatory certainty has up to now been a hallmark of the Irish RE market.

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Conal Shovlin, Peter McArdle