

28th July 2011

## **Electronic submission to:**

Mr. Billy Walker (billy.walker@uregni.gov.uk)
The Northern Ireland Authority for Utility Regulation,

&

Mr. Jamie Burke (<u>jburke@cer.ie</u>)
The Commission for Energy Regulation (RoI)

Re: <u>DW Consultancy Ltd's response to the Joint Regulatory Authority Consultation on:</u>
'All-Island Generator TUoS Tarriffs (SEM-11-036)'

&

'Generator TUoS Methodology(SEM-11-037)'

Dear Sirs,

DW Consultancy Ltd. (DWC) welcomes the opportunity to respond to the RAs above referenced consultation on TUoS generator charges and charging methodology, and we apologise for the slight delay with this submission.

DWC has a portfolio of wind power projects in Northern Ireland and Republic of Ireland that are in operation, construction or in various stages of development.

DWC responded to the last TUoS consultation on 13<sup>th</sup> May 2011, and our thoughts highlighted in that submission, i.e. with regard to the proposed level of increase in TUoS charges to apply to NI projects, is still our primary concern with this consultation.

We also fully support the submission by IWEA with regard to this consultation, and we would reiterate their concerns with regard to

i. the inclusion of the North-South Interconnector in the EirGrid forecast statement,

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ii. the significant increase in averaged tariff for wind generators, particularly in Northern Ireland

We still believe that it would be unfair to harmonise tariffs on an all-island basis until the major jurisdictional differences in the level of monies required for a transmission system are addressed.

Yours Sincerely,

Barry O'Kane, B.Eng, C.Eng, MIEI,

Chartered Engineer

For: DW Consultancy Ltd.

cc Ms. Doreen Walker DW Consultancy Ltd.