

12rd October 2011

Paul Brandon
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Email: pbrandon@cer.ie

Consultation on Tie Breaks in Dispatch in the Single Electricity Market and Associated Issues, SEM/11/063

Dear Mr Brandon,

Aeolus (Windfarms) Ltd welcomes the opportunity to respond to the Regulatory Authority's (RA's) consultation on Tie Breaks in Dispatch in the Single Electricity Market.

Aeolus (Windfarms) Ltd is developing a 28 MW windfarm in North East Mayo and has a gate 2 connection agreement. The project is expected to be energised in 2013.

Aeolus (Windfarms) Ltd supports the detailed response by IWEA on issues raised in the RA's decision and consultation paper. Outlined below are additional comments on the temporary connection proposals.

Temporary Connections

In the RA's Tie breaking consultation it is proposed that temporary connections should be in the category with 0-33% firm access. However these categories will only apply in the two constraint areas. It is unclear how temporary connected generators will be treated outside of these areas.

Aeolus believes in principle that generators with temporary connections should be constrained before those with permanent connections. This principle was established in the South West Gate 2 constraint reports. Similar to the "grandfather" issue, there is a need for regulatory consistency and stability on the treatment of temporary connections.

Temporary connections are against the principles of group processing. The group processing approach details how shallow connections are allocated. Temporary connections 'bends' these rules to facilitate early connections for some generators. Aeolus is not against temporary connections in principle but strongly believe that they should only be permitted on the basis that they do not negatively impact on generators with permanent connections.

In the COPP direction the CER agreed that temporary connection should only be permitted such that other pre-Gate 3 generators on the local network are not impacted negatively, suffering local constraints due to the temporary connection. Aeolus respectfully requests that the CER continue to respect this principle in consideration of the Tie-breaking direction.

Should you have any queries, or should you wish to discuss this matter further, then please do not hesitate in contacting me on the details provided below.

Yours Sincerely,

Tommy Brennan
Director
Aeolus (Windfarms) Ltd
Killeen House
Claremorris
Co. Mayo