



**SEMC consultation on the Treatment of Price Taking  
Generation in Tie Breaks in Dispatch in the Single Electricity  
Market and Associated Issues.**

**SEM 11- 063**

**Introduction**

Coillte welcomes the opportunity to respond to the CER's consultation paper.

Coillte have circa 400 MW of joint venture and 100% owned projects at various stages of development in Gate 2 & 3.

Coillte supports the proposals being put forward by IWEA in relation to the main issues in the consultation paper.

Coillte believe the consultation is a temporary means to resolving the challenges associated with increased renewable energy on the system whilst the fundamental issues pertaining to feed in tariffs being undermined through its linkage to metered output and delays to the delivery of a robust Transmission System to ensure export capacity, remain. Outlined below are additional comments on some of the issues.

**1. Hierarchy**

It is Coillte's view that the hierarchy for dispatch published in the Dispatch and Scheduling decision paper alongside this consultation, has not been consulted on and query the role of Eirgrid as owner of the new East-West interconnector in the development of the proposed hierarchy.

Coillte believe that the detail provided on the hierarchy does not provide the necessary clarity in relation to how the 2009 RES-E directive's priority dispatch of wind within Ireland is being fulfilled, or the mechanisms proposed for counter-trading across the interconnector will be implemented.

## **2. Constraint Lists and Groups**

Coillte agree with the principal of constraints groups and lists on a (FAQ) basis however do not believe the categories defined in relation to the constraints lists are appropriate. Coillte would wish to see the date of Connection application/Gated process and firm access reflected as a means of developing the categories. Coillte echo IWEA's position in relation to the absence of data to inform the decision making process.

It is Coillte's view that the proposed groups must be clearly defined and not open to periodic review/expansion in order to ensure the levels of certainty required for investment decisions in the industry.

In relation to generators not included in the constraints lists a further mechanism should be defined to clarify post Gate 3 scenarios so that further groups are not required in the future.

## **3. Compensation for Curtailment**

Coillte support the principle of pro rata curtailment on the island of Ireland however stress the requirement for non-firm generator compensation as well as firm, in these instances.

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