

Paul Brandon
The Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.
10th October 2011

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

Dear Mr Brandon,

Killala Community Windfarm Ltd is developing a windfarm near Killala in North Mayo. This development is being led by a group of eight families in the area. This project will offer local people an opportunity to invest in the project, thereby maximising the return to the locality. Planning permission was granted by an Bord Pleanála in October 2010. A grid application was made in 2005, and the project is in Gate 3. Killala Community Windfarm Ltd would like to make the following observations on the tie-break consultation.

We understand that temporary connections may be offered to generators until such time that their entire shallow connection is complete. We understand that there is more demand for grid than what is available. While temporary connections may be required until such time as the grid is reinforced these temporary connections must not negatively impact on generators which have permanent connections in the same general area. We believe that the constraints should be weighted upon those generators connecting temporarily, rather than generators with permanent connections. Those that have paid for permanent connections will not realise the full potential of their investment if they are constrained by such temporary connections.

The proposal in the Regulator's Tie Breaking consultation paper is that windfarms with 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. We are concerned that this proposal does not go far enough to protect generators with non-firm permanent connections from potentially higher constraints caused by temporary connected generators.

We are also concerned that some Gate 3 generators in Co. Mayo have been allocated firm access based on their temporary connection methods. This is outside of the

principles of group processing and has now created another category of temporary connection. Temporary connections are a “bend” of the group processing rules. Allocating firm access based on temporary connections is another “bend” of the group processing rules. Grid connections and constraint issues are complex enough without creating sub-categories of generators with special connection rules. We are 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 generators on the local network are not impacted negatively, suffering local constraints due to the temporary connection. We respectfully request that the CER continue to respect this principle in consideration of the final tie-breaking direction.

We trust you will take on board our concerns.

Yours sincerely,

Damien Barrett
Director
Killala Community Windfarm Ltd