

Sean Connolly
Eirgrid
The Oval,
160 Shelbourne Road,
Ballsbridge,
Dublin 4,
Ireland

05 August 2011

SEM Testing Tariffs

Dear Sean

Energia welcomes the opportunity to comment on the above consultation.

Following detailed consideration Energia broadly supports the proposed testing tariffs and would endorse the views expressed by the Irish Wind Energy Association (IWEA).

Notably Energia considers the approach taken in distinguishing between units that are reliable and proven from those that are less reliable or that in the process of commissioning to be a wholly sensible approach. Energia agrees with the principle that testing costs should be covered by those units imposing these costs on the system. This will allow generators to test their plant more readily, when this is required, which should lead to increased performance across the generation fleet and therefore improved system stability.

Energia concurs with the view that the asset owners of interconnectors, including the future East West Interconnector, and pumped storage units should pay appropriate testing charges and we would urge the regulatory authorities and SEMO to ensure this is possible through expeditious modifications, as necessary, to the trading and settlement code and central market systems.

It is Energia's considered view that testing charges are not warranted for wind because of its unique characteristics detailed in the IWEA response and Energia understands from the consultation paper that it is not the intention or effect of the proposals that wind will bear testing charges.

Please do not hesitate to contact me if you would like to discuss this response.

Yours sincerely

A handwritten signature in blue ink that reads "K Hannafin". The signature is written in a cursive style with a large, stylized 'K'.

Kevin Hannafin
Regulation Manager