

Sean Connolly
Operational Services & Performance
EirGrid
The Oval
160 Shelbourne Road
Ballsbridge
Dublin 4

05 August 2011

Sean,

Re: ESB PG Response to Consultation on SEM Testing Tariffs

ESB PG welcomes the opportunity to respond to the consultation on SEM Testing Tariffs. We support the proposals to introduce two tariffs for testing with the tariff applied to a particular generator related to the risk it poses on system security. We consider that this is overall a fairer means of allocating testing charges. Below are comments relating to specific sections of the consultation paper.

Section 2.2

We broadly agree with the criteria set out for the different test phases and the requirements for a unit to progress from one phase to the next phase, these seem very reasonable when commissioning a new unit. However, when considering a unit retuning from a long overhaul or major outage, selection of the applicable test phase becomes subjective. We would therefore consider it appropriate that a dispute resolution process be put in place should there be a disagreement between the generator and the TSO.

Section 3.2

We are also concerned by the charges associated with additional run hours which vary inversely with the size of generator unit. The results of the modelling for estimation of these costs are counter intuitive and result in step prices that seem unduly harsh for small generator units. We would like the TSOs to consider implementation of more reasonable prices for smaller generators.

Should you have any queries in relation to the above response please do not hesitate to contact me.

Yours sincerely,

John Lawlor,
Manager, Strategic Regulation.