



The Secretary
SEM Committee
C/O Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Revised Submission - 19th November 2012

Re: Treatment of Curtailment in Tie Break Situations – Proposed Decision 5th October 2012.

Dear SEM Committee,

The National Offshore Wind Association of Ireland (NOW Ireland) was established to promote the development of Ireland's substantial offshore wind resource and to ensure that our island leads the way in building a green energy economy. NOW Ireland was established by companies that have over 2,600 MW of offshore wind farm projects under development in Irish Waters and have since been joined by a number of national and international companies operating in the offshore wind supply chain sector including turbine, foundation and substation equipment manufacturers.

The members of NOW Ireland welcome the publication of the recent proposed decision by the SEM committee on "Treatment of Curtailment in Tie-Break Situations". Our members recognise that this decision involved a complex assessment of the implications of the various options for the allocation of curtailment and that it has been difficult to reach a consensus within the industry.

Insofar as it concerns a 'pro rata' approach to tie-beaks, we believe that the proposed decision will:

- Have the minimum impact on consumer and Dispatch Balancing Costs.
- Facilitate Ireland and Northern Ireland in reaching their 2020 Renewable Targets
- Provide an efficient entry signal and incentivise the development of renewable energy in Ireland
- Ensure a stable investment environment for renewables in Ireland going forward.

However, we believe that the proposal to phase out market compensation payments for curtailment of wind projects is likely to be a discriminatory treatment viz other energy forms, and would strongly advise against this aspect of the proposed decision.

We would welcome the opportunity to discuss these views with you further. If you have any queries please do not hesitate to contact us.

Yours sincerely,
NOW IRELAND

Brian Britton
Secretary