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Constraint Groups Consultation SEM-12-076

Dear Jamie and Andrew

Energia welcomes this opportunity to respond to the above consultation on constraint groups (SEM-12-076), both endorsing and supplementing the IWEA submission with Energia's considered views.

Energia is an active member of the Irish Wind Energy Association (IWEA) and supports its response, notably in:

- Calling for greater clarity on the treatment of projects outside constraint groups.
- Stressing the need for a reporting mechanism on how constraints are applied operationally to ensure consistency and transparency of approach.
- Welcoming the publication of constraint groups in Donegal and the South West.
- Suggesting that consideration should be given to more widespread use of SPS, whilst importantly noting the need for compensation for windfarms with SPS in line with SEM principles where they have firm access.
- Highlighting the importance of constraint reports reflecting the rule set applied to projects outside constraint groups which will be different to those within constraint groups

Supplementary to the IWEA response, Energia has the following important comments:

1. Energia supports the proposal for no constraint group in Northern Ireland, based on the reasoned understanding that:
 - a) For constraint at a local node, SPS should operate first, then constraints should be applied equally at that node, except for permitted exclusions (i.e. permitted non controllable windfarms)
 - b) For transmission constraint on backbone network, constraints should be alleviated on the backbone network by feeder nodes which most alleviate the constraint. SPS should be applied first at the feeder node, then applied equally to other windfarms at the node, except for permitted exclusions.
2. Energia supports the proposed constraint group for Donegal and proposed constraint group for the South West in 2015/16 once the 220KV transmission projects have been implemented.
3. As stressed by IWEA, greater clarity is required on the treatment of constraints outside constraint groups. It is Energia's reasoned understanding that for anywhere outside a constraint group, including Northern Ireland:
 - a) For constraint at a local node, RAS scheme or SPS should operate first, then constraints should be applied equally at that node, except for permitted exclusions (i.e. permitted non controllable windfarms)
 - b) For transmission constraint on backbone network, constraint should be alleviated on the backbone network by feeder nodes which most alleviate the constraint. RAS scheme or SPS should be applied first at the feeder node, then applied equally to other windfarms at the node, except for permitted exclusions.

Given the importance of this issue we would request the opportunity for further discussion of the above at your convenience during the course of your deliberations.

Yours sincerely



Kevin Hannafin
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