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23/07/2014

**Re:** Views of the Irish Wind Farmers Association on the Draft Decision Paper (SEM-14-045)

**By email to:** [JeanPierre.Miura@uregni.gov.uk](mailto:JeanPierre.Miura@uregni.gov.uk) & [pnewsome@cer.ie](mailto:pnewsome@cer.ie)

Dear SEMC,

As you are aware, the Irish Wind Farmers Association (IWFA), which represents the vast majority of independent SME wind promoters in Ireland, has been very actively involved in the consultation process on the development by the SEMC of the I-SEM. We are increasingly concerned about the trend in the development of the high level design of the I-SEM. This document sets out the views of the Irish Wind Farm Association (IWFA) on the proposals described in the Draft Decision Paper of 9 June 2014.

## Overview

The IWFA is dismayed by the draft decisions of the Single Electricity Market Committee (SEMC). The draft decision paper (page 5) states that the proposed design has been developed (inter alia) to "... promote renewable energy sources [and] establish a level playing field in which competition can flourish..." Almost without exception, the SEMC's draft decisions discriminate against wind generation. It is difficult to conceive of a set of energy market and capacity remuneration arrangements less well suited to wind generation. Specifically:

- The SEMC proposes that the primary market should be the Day Ahead market, despite the fact that wind generators cannot possibly know, 24 hours ahead of real time, whether they will be able to generate – unlike every thermal generator on the system.
- The SEMC proposes the most uncertain and volatile of all possible imbalance settlement pricing mechanisms, despite the fact that wind generators will inevitably

be exposed to this imbalance price every hour of every day for at least a portion of their output – unlike every integrated utility and thermal generator.

- The SEMC proposes a capacity remuneration mechanism in which the risks of participation by wind generators are very significantly greater (probably prohibitively so) than for every thermal generator on the system.

The SEMC appear to justify these anti-wind proposals on the spurious grounds that it will reduce curtailment of wind generation (by enabling “optimum” interconnector scheduling at the day-ahead stage). The proposals will have the opposite effect and result in more unnecessary wind curtailment. The SEMC analysis appears to be founded on the mistaken view that equalising day-ahead prices between the I-SEM and BETTA markets will ensure efficient interconnector flows. This is simply wrong for a system with up to 40% wind generation – we only know whether we should import or export when we know if the wind blows. There is no getting away from this fact. If, as we fear, wind and other generators under-sell in the day-ahead market (because the risk of over-selling is too great), then interconnector decisions based on equalising day-ahead prices will result in more, not less, inefficient wind curtailment. While this mistake may, to some extent, be corrected in the Intra Day Market as wind forecast error reduces, it is by no means certain that demand will present itself in that market. Getting interconnector flows wrong at the day-ahead stage, in the hope that they will be (partially) corrected in the intra-day market, is a ridiculous basis on which to design the new market arrangements.

The IWFA is, frankly, at a loss. We had a very strong impression that the SEMC was intent on these anti-wind proposals in the run up to the recent consultation, and our suspicions have been borne out. This impression has been further reinforced by the misreporting of the consultation responses – by our estimation, over 50% of respondents stated Option 4 as their preferred choice of energy market, not the 16% quoted by the SEMC in its presentation to the recent Stakeholder Forum<sup>1</sup>. This seems to us to have damaged the integrity of the whole consultation process, if not the HLD development itself.

If wind generation was a tiny, immaterial part of the future Ireland system, it may be understandable to create new market mechanisms so ill-suited to wind. We find it impossible to comprehend why we would wish to go down the route proposed when the aspiration is to grow wind power significantly. As we all know only too well, this island is currently very exposed to energy security risks by virtue of its lack of fossil fuel resources, and at the same time is hugely endowed with its own renewable energy resources, some of which can now produce at a lower cost than the cheapest gas derived electricity. We will inevitably be seeking to go well beyond a 40% contribution to electricity from renewable sources over the coming years - ideally seeking to have all of our energy (never mind electricity) come from renewables in a reliable and secure manner. Given our location on the very western edge of Europe, it is unavoidable that we have weak links with the rest of the European electricity market. With this in mind, we need to make provision for our own needs - and not simply adopt markets more designed for continental Europe and its fuel mix. Compliance with the EU Target Model must be achieved in a way which matches the future requirements of our own system and does so in compliance with the Renewables Directive. The SEMC has partly recognised this by maintaining the legal obligation of 'priority of dispatch' as a tenet of the new market, and we urge the SEMC also to give effect to the other equally relevant legal obligation from the same Article in that Directive, namely 'guaranteed transmission' (which to date the SEMC has completely ignored, instead using

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<sup>1</sup> Page 4, "Integrated Single Electricity Market (I-SEM)", Presentation to Stakeholder Forum on I-SEM Draft Decision, Dundalk, 17th June 2014 ([www.allislandproject.org](http://www.allislandproject.org))

the spurious threat of curtailment as a lever to get the renewables sector to accept the SEMC's draft proposals). The damage that the SEMC's draft proposals would do to the wind sector would, we believe, cause us to miss our targets and therefore to breach the Renewables Directive. In damaging wind, the I-SEM as proposed would have the effect of dramatically reducing the current approx. €200m per year benefit to consumers from having wind on the system, based on an approach purportedly intended to protect the consumer.

We do not intend to repeat, in this document, all of the arguments for an alternative set of energy and capacity arrangements that we (and many others) set out in response to the consultation. We urge the SEMC, in the strongest possible terms, to revisit those arguments and to re-think.

The remainder of this document focuses, instead, on a number of specific issues of greatest concern within the overall construct now being proposed by SEMC.

### **Mandatory versus exclusive day-ahead market**

The Draft Decision documents have left us very confused about the SEMC's intentions in this regard. In places, the SEMC states that the day-ahead market will be exclusive but not mandatory (e.g. SEM-14-045, page 7); in other places the SEMC implies that this decision will be taken during the detailed design stage (e.g. SEM-14-047, paragraph 3.6); elsewhere that 'mandatory' for wind generation means "best endeavours" (e.g. SEM-14-045, paragraph 6.4.23), which is a recognition of the difficulty in enforcing mandatory participation for wind.

We reiterate our very strong opposition to a mandatory day-ahead market (even best endeavours), which would discriminate very materially against wind generation. It would compel wind generation to participate in a market which would expose us to additional, entirely unnecessary, risk – namely the risk that our day-ahead wind forecasts are wrong (which they inevitably will be, every hour of every day, given our exposure to the very unpredictable Atlantic weather system – not because we are, somehow, ill-informed, incompetent or under-resourced). Thermal generators do not face this risk. This major weakness was recognised in the original Consultation Document (paragraph 8.4.26): "... it exposes the wind generation to the impact of it being less predictable closer to real time" and again in SEM-14-045 (page 43/44). It is wholly unacceptable to compel wind generators to participate in a market which would increase our risk, and so put IWFA members at a competitive disadvantage.

The SEMC's Draft Decision documents suggest in several places that, within the market construct now being proposed, wind (and other) generators would be incentivised to participate in the day-ahead market – for example, for fear that by not participating, the day-ahead price would be even less appropriate for making interconnector decisions (in this case, too high) and wind curtailment would be even greater than otherwise. We agree. It is essential that wind (and other) generators be free to make their own assessment of the risks of participating or not participating in any timeframe ahead of real time. That is how efficient markets work – not by forcing participants to trade when they would not otherwise do so. Within the proposed market construct, it may well be that some/all wind generators will elect to trade in the day-ahead market based on their own risk assessment.

The SEMC Draft Decision documents also raise the option of an "aggregator" of last resort (the TSO) that small wind could use to trade in the markets on their behalf. The option of using an aggregator may be attractive to many IWFA members, to reduce the administrative burden of trading directly in the new suite of markets. As proposed, however, it does not change any of the financial risks that a wind generator would face, and raises the concern

that the TSO would be making trading decisions on our behalf with no incentive to do so in a manner that maximises our outturn revenue. One option, which we would like to explore with the SEMC, is whether the TSO could trade as principal from the day-ahead stage onwards, rather than just as our agent. The reality is that the TSO is better placed than any of us to forecast wind and manage the risk between 24 hours ahead and real time. If the TSO were to manage this risk, it would also benefit from the diversity of the full portfolio of (independent) wind on the system. The TSO could sell its forecast volume of wind at the day-ahead stage and then trade that position through to real time and imbalance settlement on its own account. The independent generators who elect to participate would receive the day-ahead revenue.

The non-mandatory nature of the intended day-ahead market must, in our view, be confirmed at this stage. It is much too fundamental to the survival of wind generation to leave to the detailed design phase.

### **The imbalance settlement price**

We repeat again that independent wind generators will inevitably be exposed to the imbalance settlement price. Even if we trade actively in the day-ahead and intra-day markets, the variability of wind will mean that we will always have either under or over-sold, and hence be exposed to the price in the imbalance settlement mechanism. The imbalance settlement mechanism proposed by the SEMC would expose wind generation to an exceptionally risky and volatile price. It is discriminatory against wind (because wind is uniquely variable close to real time) and will further work against the SEMC's stated objective of creating a level playing field. As proposed, the imbalance settlement price will expose wind generators to:

- Whatever prices other generators submit as Incs and Decs to move away from their scheduled position – which may include fully loaded start-up and no-load costs spread over very short periods
- The decisions taken by the TSO in real time to balance the system, whatever they may be and regardless of whether those decisions were efficient, least cost or in error, or whether those decisions were taken for underlying energy balance or system constraint reasons to the extent that those can be distinguished in practice (which is exceptionally difficult to do)
- Gaming by generators with local monopoly power (e.g. behind a transmission constraint or required for other system stability issues)

This is entirely unacceptable and discriminatory against wind.

The SEMC Draft Decision document makes clear that the motivation for such a volatile and uncertain imbalance settlement price is to induce wind to participate in the day-ahead market. The argument appears to be that if the imbalance settlement market were more stable, wind would be more likely to sell its output there and so make the day-ahead market less liquid. This is wrong. The precise opposite is the case. Wind output is uncertain because we do not know how much the wind will blow. If we trade in the day-ahead market, we run the risk that we are unable to match that with output on the day and so become exposed to the imbalance settlement price. The more volatile the imbalance settlement price, the greater the financial risk of over-selling in the day-ahead market. If the SEMC insists on exposing wind to the exceptionally risky imbalance settlement price now proposed, the effect will be to incentivise wind generators to under-sell in the day-ahead market. It would simply be too risky for us to sell a lot in the day-ahead market, because if the wind does not blow we would have to 'repurchase' that output through the imbalance

settlement mechanism at an exceptionally risky price. It would, in such a system, always be safer for a wind generator just to accept whatever (very uncertain) price it gets through the imbalance settlement mechanism than risk making large financial losses by selling day-ahead and risk having to buy that volume back at a much higher imbalance settlement price.

If the SEMC is genuine in its stated objectives of encouraging renewables and creating a level playing field, it MUST address this fundamental unfairness.

Many respondents to the consultation, including us, supported a suite of day-ahead and within-day markets alongside an imbalance settlement mechanism that was based on a full unconstrained schedule of the whole power system. We remain firmly of the view that these are not incompatible. Indeed, for the reasons outlined above, they would be mutually reinforcing – i.e. such an imbalance settlement mechanism would encourage more wind generation into the day-ahead market, not less. If the imbalance settlement price were to reflect the full unconstrained schedule of the entire system, it will be significantly less volatile than that proposed by the SEMC. As a result, the risk for wind of over-trading in the day-ahead market will be much lower, thus encouraging greater participation at the day-ahead stage. We urge the SEMC to reconsider this option along with any other options to reduce the volatility and riskiness of the imbalance settlement price – including, for example, unconstrained schedules to remove the effect of system constraints and TSO error from the price mechanism, a broad definition of the ‘marginal’ action to balance the system to avoid extreme values, strict regulation of inc and dec prices, etc.

As with the first issue above, in our view this is too fundamental to our ability to participate in the proposed markets to leave to the detailed design phase.

### **Renewable energy support schemes**

The IWFA is unclear what the SEMC is proposing in relation to both existing and possible future support schemes for the wind sector. This is an issue of very significant concern to IWFA members, and it is important that there is no uncertainty or lack of clarity on this. We urge the SEMC, therefore, to be much more clear and explicit about proposals in this area. We comment in turn on (i) wind projects under existing (REFIT) support schemes and (ii) possible future support schemes.

For wind and other renewable projects under **existing** support schemes, the overriding principle should be to ensure no change to the financial position of any generator or supplier as a result of the move to I-SEM. That includes projects that are built and about to build under existing schemes. We urge the SEMC to make a clear and unambiguous commitment to this principle, which should guide all detailed design of the new arrangements. Without this, the financing arrangements that underpin wind generation projects that benefit from any of the existing support schemes would be endangered, hence undermining their commercial viability.

Once established, this principle could be achieved, no doubt, by many alternative means, and IWFA members will be flexible in precisely how it is done. A central issue will be the choice of ‘reference price’ to replace the current SEM reference price in the REFIT arrangements. Simple replacement of the SEM price with the day-ahead price, for example, would not achieve the above principle if it was applied to the settlement. It would instead leave a hole in the funding under the REFIT scheme - a new ‘missing money’ problem. REFIT currently guarantees both the REFIT price for generators and the balancing payment for suppliers. Simply using the day-ahead price as ‘reference price’ for settlement would alter that, and so fundamentally alter the terms of the REFIT schemes on which investments have

been financed. Where that 'missing money' could exceed the balancing payment, many suppliers would understandably seek to exit the scheme and it could collapse.

A mechanism is required (for example) to derive the 'reference price' from the weighted mix of market prices (day-ahead, intra-day, settlement), and that price should only be used for the estimated ex-ante PSO payments to the supplier. To avoid completely undermining REFIT, the ex-post settlement must not be carried out on the basis of some market price but on the total market revenue received for the project, as is done in SEM to reflect the current legislation. (In the case of generators with a portfolio of wind projects, the aggregate profile of market selling prices for the whole portfolio could be applied to each scheme, for example).

There is clearly much greater freedom over the design of arrangements for possible **new** support schemes in the future. We note the SEMC's comment that one option for such schemes could be to set the day-ahead price as the reference price for future schemes. This may indeed be possible and, as the SEMC observes, may have the advantage of encouraging participation in the day-ahead market. The financial implications of that (and specifically that no wind generator will ever be guaranteed to sell all of its output at the day-ahead price) would need to be taken into account in the design of any new support schemes, to ensure that they remain financeable.

Since support schemes are in the end the purview of the two Governments, we urge SEMC to engage now with both Departments and the wind industry on the general issues around support, to avoid creating a fatal flaw in I-SEM.

### **Capacity Remuneration Mechanism (CRM)**

The IWFA is pleased that the SEMC proposes to include a CRM in the I-SEM arrangements. In an energy-only market, the market price would rise above the SRMC of the marginal generator at times of system stress, and all generators that produced energy in those periods would receive that higher price. As we have a small system, there is a clear risk that lumpy additions of capacity will depress prices for prolonged periods and hence generators would be under-remunerated without a CRM in place to top-up the energy price.

The proposed Renewable Obligation (RO) version of a CRM has benefits in terms of market entry and exit signals, which could lead to a conventional generation fleet more compatible with wind. However, it could be exceptionally difficult for a wind generator to participate in – once again, the SEMC is proposing arrangements which, as presented, seem to discriminate against wind. Any generator which holds a RO would be liable to pay the difference between the day-ahead and RO strike price whenever the former exceeds the latter. So long as the generator actually generates in that period, it is hedged against times of very high spikes in the day-ahead price. For variable wind, however, there is far greater uncertainty whether it will be able to do so – unlike every thermal generator on the system. Indeed, given the price-lowering effect of wind, such price spikes are most likely when wind is not generating, raising the risk for wind that it is not generating when such spikes occur. The result is, once again, that wind generation will be disadvantaged. The 'missing money' from the energy price can be topped up by thermal generators through the RO scheme at relatively low risk; wind generators cannot do this. We remain somewhat sceptical that some form of adjustment for 'capacity value', mentioned to us by CER in a recent meeting, could offset the risk for wind of not being present during price spikes.

We also noted the comment from CER that the SEMC may consider following the UK lead of excluding supported projects from the capacity mechanism, which also seems

discriminatory, and we would welcome clarification on this point as a matter of urgency. While on the face of it such a move would have little effect on the revenue of supported projects, it would have the most unwelcome effect of raising the PSO, when that is already a growing issue for the sector.

The CRM proposal as presented is fundamentally unfair and anti-competitive. We reemphasise that, in an energy only system, the high price in periods of system stress would be paid to all generators who generate energy in that period – not just to some technologies, or those who are deemed to be ‘reliable’ in some sense. How that can be offset by some ‘capacity value’ factor, we cannot see at present, but need to be able to assess it at this stage, before the detailed design stage.

We oppose the addition of any further ‘penalties’ to such a scheme, which would further exacerbate the risk and so further discriminate against wind.

We urge the SEMC to reconsider the form of CRM system, with the objective of implementing a scheme that is equally accessible for all generation technologies on a level playing field. The Draft Decision document dismisses a price-based CRM scheme on the grounds that it would require a price to be determined administratively rather than by the market. And yet the proposed RO scheme requires both the quantity of ROs and the strike price to be determined administratively! We urge the SEMC to reconsider the option of a simple price based CRM system.

### **Aggregator**

The new arrangements are likely to require small renewable projects to use an aggregator to enable them to interact with the I-SEM, and the proposal to have the safety net of an aggregator of last resort is, in principle, welcome. How it is implemented is crucial. It should be enduring as in Denmark, or at least be active when there are fewer than 2 commercial aggregators active in the I-SEM.

Use of an aggregator will, of course, have a cost. It might be expected that only ‘out-of-support’ and ‘supplier-lite’ projects, would require this service initially. For the viability of these projects, it will be essential that the cost of this service is kept to a minimum, and ideally that cost should be taken into account in the calculation of the REFIT top-up.

The TSO already wears multiple hats, so we raise a slight concern about Eirgrid having this role as well within I-SEM, and suggest that the necessary regulation be in place to deal with the possible conflicts arising from those multiple roles.

### **Intermediaries, de minimis, etc**

The IWFA is unclear how the arrangements proposed in the SEMC’s Draft Decision documents would affect intermediaries, generators that fall below the de minimis threshold, negative demand and ‘supplier lite’. Up to 40% of the market could be relying on the Intermediary feature with long term REFIT contracts by 2020. We have been assured by CER that all of these features of the existing SEM can continue to operate in the I-SEM. However, we have been given the impression that, for non-technical reasons, the bidding of ‘net negative demand’ into the I-SEM may be reconsidered, which would affect ‘supplier lite’ projects. There should be no change to this arrangement, as that would undermine the financing of the existing small number of projects in this category as well as the few now

planning to go this route under REFIT 2. In any case that basic structure will continue to be required as projects move out of support, in order for them to remain viable in the open market.

We urge the SEMC to now provide clear guidance on how these features would operate within the proposed arrangements.

### **Out of support' projects**

The features discussed in the last two sections are very important for supported projects but absolutely vital for projects coming out of support. IWFA seeks to represent about 38 of these with a current total of 140 MW and growing (36 projects with an average size of about 3 MW). Please see list of out of support projects appended.

In addition, out of support projects would need to be able to access a CRM to be viable, so the design of that aspect of I-SEM is even more crucial to the out-of-support projects. Once again, we fail to see how these projects could possibly participate on an equal basis with the fossil plant in the CRM as proposed.

All projects will be coming out of support at some stage over the next 15 to 20 years or so, and therefore within the probable lifetime of the I-SEM market. Unless the SEMC wants all these projects to shut down when they come out of support, the arrangements must also work for the out of support projects. Indeed all authorities have expressed the view that wind projects should be able to survive in the open market, without support, in the medium and long term - a good idea in principle. That means however that such authorities, including SEMC, need to think through the consequences of what they are proposing for wind projects that are out of support. If the market structure around such projects renders them unviable, they will be forced to shut down, progress to targets will be affected and new supported projects will be required. Such an outcome would completely contradict the authorities' stated aim of the survival of wind projects in the open market.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Carville', written over a light blue rectangular background.

James Carville,  
Chairman,  
IWFA



## **Appendix 1**

### **List of out of Support Projects**

List of projects out of support:

Support scheme	Project	MW	Utility owned	Large Dev.	Small Independent developers	
					1-10 MW	10-20MW
Valoren	Bellacorrick	6.45	6.45			
Thermie	Cronalaght 1	3			3	
AER 1	Barnesmore	15	15			
AER 1	Tullymurray.Arigna	4.8	4.8			
AER 1	Spion Kop - Leitrim	1.2			1.2	
AER 1	Drumlough Hill	4.8	4.8			
AER 1	Crockahenny	5	5			
AER 1	Cark	15		15		
Thermie	Kilronan	5			5	
Thermie	Inverin	2.64			2.64	
AER 3	Currabwee	4.62			4.62	
AER 3	Beenageeha	3.96		3.96		
AER 3	Milane Hill	5.94		5.94		
TPA	Cronalaght 2	1.98			1.98	
AER 3	Tursillagh	15.18		15.18		
AER 3	Largan Hill	4.8	4.8			
Thermie	Beal Hill 1	1.65			1.65	
TPA	Culliagh	11.88	11.88			
Thermie	Anarget	1.98			1.98	
AER 3	Black Banks 1	3.4	3.4			
TPA	Corneen	3	3			
TPA	Carnsore	11.9	11.9			
AER 5	Inis Meain	0.675			0.675	
AER 5	Inverin 2	0.66			0.66	
TPA	Meenadreen	3.4	3.4			
TPA	Kings Mountain	25	25			
AER 5/6	Beal Hill 2	2.55			2.55	
AER 5	Burtonport	0.66			0.66	
AER 5	Raheen Barr	18.7				18.7
AER 5/6	Meenanilta 1	2.55			2.55	
AER 5	Old Sonnagh	7.65			7.65	
AER 5/6	Cuillalea 1	2.55			2.55	
AER 5	Mienvee	0.85	0.85			
AER 5/6	Curraghraigue	2.55			2.55	
AER 6	Meenanilta 2	2.55			2.55	
AER 6	Tursillagh 2	6.8		6.8		
AER 6	Black Banks 2	6.8	6.8			
AER 5/6	Meenacloghspar	1.2			1.2	
AER 5	Skehanagh	3			3	
AER 5	Beallough. WEXFORD	1.7			1.7	
AER 5	Carrig. Tipperary	3			3	
AER 5	Ballyveny. Tipperary	2.55			2.55	
AER 5	Moanmore, Kilrush	12.6		12.6		

AER 6	Gartnaneane	4.5	4.5			
AER 5	Kilbranish 1	2.55			2.55	
AER 6	Kilbranish 2	2.6			2.6	
TPA	Meentycat	72.4	72.4			
AER 6	Mount Eagle 1	4.91	4.91			
AER 6	Coomatallin 1	4.25	4.25			
TPA	Coomatallin 2	1.7	1.7			
TPA	Ballywater	31.5		31.5		
AER 6	Gneeves	9.35	9.35			
TPA	Arklow Banks	25.2	25.2			
AER 6	Muingaminnane	15.3		15.3		
AER 6	Mountain Lodge	37.5	37.5			
AER 6	Derrybrien	60.35	60.35			
AER 6	Drumlough 2/Lough Doo	9.35	9.35			
AER 6	Cloghbola	10		10		
AER 6	Taur, Newmarket	26		26		
AER 6	Altnagowan.Arigna	7.65			7.65	
AER 6	Black Banks 2	6.8	6.8			
AER 6	Beam Hill	14				14
AER 6	Booltiagh 1	19.5	19.5			
AER 6	Carrane Hill. Sligo	3.4	3.4			
AER 6	The Coonm.Kilgarvan	6.8	6.8			
AER 6	Drumkeen, Ballybofey	22.5	22.5			
AER 6	Coomagearlahy.Kilgarvan	42.5	42.5			
AER 6	Moneenatieve, Co. Leitrim	3.96			3.96	
AER 6	Geevagh	3.4	3.4			
AER 6	Foiligreanna.Kilgarvan	5	5			
AER 6	Glackmore Hill	4.95	4.95			
AER 6	Cronelea Upper	2.55			2.55	
AER 6	Cappaboy.Kealkill	4.25			4.25	
AER 6	Cappaboy.Kealkill	4.25			4.25	
AER 6	Kilvinane	4.5			4.5	
AER 6	Seltannaveeny.Arigna	4.5			4.5	
AER 6	Lahanght Hill	4.25			4.25	
AER 6	Cronelea,Shillelagh	5			5	
AER 6	Dunmore, Collon	1.7			1.7	
AER 6	Cornachah,Killybegs	2.55			2.55	
	<b>Total MW</b>	<b>733</b>	<b>451</b>	<b>142</b>	<b>106</b>	<b>33</b>
	<b>Number of projects</b>	<b>80</b>	<b>32</b>	<b>10</b>	<b>35</b>	<b>2</b>