

# Moneenatieve Wind Farm Ltd.

Barrowford, Athy, Co. Kildare  
Tel: 059 8634570 Fax: 059 8634571

Jean-Pierre Miura  
Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED  
[JeanPierre.Miura@uregni.gov.uk](mailto:JeanPierre.Miura@uregni.gov.uk)

Philip Newsome  
Commission for Energy Regulation  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24  
[pnewsome@cer.ie](mailto:pnewsome@cer.ie)

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**Re: Response to the Draft Decision Paper SEM-14-045**  
**Integrates Single Electricity Market (I-SEM)**

Dear Jean-Pierre, Philip

Moneenatieve Wind Farm Ltd (MWFL) is an independently owned business which has two windfarms, Altagowlan Windfarm, Co. Roscommon (7.65 MW) and Moneenatieve Windfarm, Co. Leitrim (4.25 MW). Both projects are out of support and are De minimis.

The detailed submissions by both the IWFA and IWEA are highly important and highlight/discuss the issues that will influence and/or prevent the development and maintenance of a growing national energy industry. The submissions show how seriously the whole wind industry views the proposed market changes and how a poor and ill-thought-out design could destroy a very important industry to Ireland and to Europe as a whole.

Wind energy is the corner stone of a renewable, sustainable energy policy. It aids us with security of supply, protects the environment, and provides a hedge against rising fuel prices in times of conflict, un-rest or economic uncertainty. Renewable energy is also vital in reducing our greenhouse gas emissions and reducing the impact of climate change. The impact which will be felt by everyone nationally and internationally.

The new I-SEM is designed to comply with the EU Target Market requirements but it must also be designed to adhere to the Renewables Directive, EU Renewable Energy Targets and Priority Dispatch. MWFL is concerned that the proposed changes will make the survival of wind energy in the electricity market difficult if not impossible.

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Directors: Padraic A. White (Chairman), Anita Layden, Sheila Layden

Registered Office: Arigna, Carrick-on-Shannon, Co. Roscommon  
Registered in Ireland - Number 337610

The main points of concern for our business are summarised below:

Non-Mandatory but Exclusive Day Ahead Market : This proposal must be maintained.

Imbalance Settlement Price: A penal and very volatile imbalance price will result in less wind going into the day ahead market. This is because the risk of getting a forecast wrong potentially could result in very high costs for the generator. A less volatile price would encourage more wind generation into the DAM. A pool price or a blend of prices would ensure that the price would not be set by one generator, would be more transparent and less volatile. A further discussion on this should be facilitated.

Aggregator: This is a welcome proposal and ensures that a small generator has an option to sell without the requirement to establish a trading desk – a concept and cost that is well out of the scope/ability of MWFL. MWFL would welcome further discussion on this before a final format for the aggregator is agreed. It should be possible to establish an entity based on best practice, using guidance from established aggregators worldwide. The aggregator must be a fair, transparent and cost-effective mechanism.

This should be an enduring entity otherwise it would bring continued uncertainty into the market

De Minimis and Intermediaries: These must be retained

Portfolio Bidding: MWFL notes that some portfolio bidding will be allowed, it is vital that there is complete transparency of Portfolio bidding.

Adequate Testing of the new market: The timelines for the completion of the new market are very tight and MWFL is concerned that this will result in inadequate testing of the new market before it is activated. MWFL proposes that a trial period during which time the new market ‘shadows’ the existing SEM is carried out. This would ensure that many variations of the generation mix would be experienced and so should highlight potential problems before going ‘live’

CRM: MWFL fails to see how a wind generator can partake in the proposed CRM and asks that the proposed mechanism is reconsidered. A long term price based mechanism ensures that wind generators will receive a fair payment for its capacity contribution to the system.

I hope the point raised in this submission will be considered while the decisions on the HLD are being finalised

Yours sincerely,



Sheila Layden,  
Director

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