

LOUGHDERRYDUFF WINDFARM

NORTH WEST WIND LTD.

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By email to:

Warren Deacon (wdeacon@cer.ie) and Kenny Dane (kenny.dane@uregni.gov.uk)

Re: Submission on

Integrated Single Electricity Market (I-SEM)

Consultation on the Aggregator of Last Resort Framework

SEM-14-106, 5th December 2014

31st January 2015.

North West Wind Ltd (NWW) welcomes the opportunity to respond to the consultation on the **Aggregator of Last Resort Framework (AOLR)**.

North West Wind Ltd. is a small 7.35MW windfarm operating under a REFIT 1 support program since 2008. NWW has contracted with a major Supply company for a REFIT 1 PPA until 2023 and will expect to continue to be paid the generator REFIT 1 price without any subtractions until then. NWW's finance is spread beyond the expiry of its REFIT 1 support scheme, necessary to obtain finance, so NWW is obviously concerned, if the windfarm will not be viable to operate outside of support due to the design of the I-SEM and in particular the proposed AOLR.

We in general support the IWFA response to this consultation and we set out our arguments below.

We may well require the services of an AOLR to be able to operate in the proposed I-SEM market, and in particular consider that:

- the AOLR must be able to trade in all of the ex-ante markets to provide an adequate service to wind, given the inevitable error in forecasting 24-36 hours ahead,
- since the need for this new service is driven by the design chosen by the RAs for I-SEM, the service should be provided at no cost to us, otherwise it simply will not work and defeat its own purpose.

We would like to thank the RAs for the opportunity to engage on this issue and to highlight the particular importance of this consultation.

Yours sincerely

Inge Buckley

**sent by email, requires no signature*

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