

Limerick City and County Council
Engine
Upper Cecil St
V94 EH9
Limerick

T: +353 (0) 61 556 000
F: +353 (0) 61 415 266

18th June 2020

+CITYXCHANGE



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 824260.

A Chara,

Limerick City & County Council are currently involved in an innovative project, called *Positive CityxChange (+CxC)*. The goals of +CxC project include the

- development of positive energy blocks and districts,
- involving the creation of local / community energy groups in energy efficiency, energy generation and local distribution,
- Installation of innovative tidal turbines and solar PV in an urban environment.

As part of this project we have examined the SEM-20-028 Consultation paper Implementation of Regulation 2019/943 in relation to Dispatch and Redispatch and we thank you for the opportunity to respond to the consultation paper.

Yours Sincerely,

Gearóid Kerin
A/Executive Engineer
Urban Innovation Department
Economic Development Directorate

Response to SEM-20-028 Consultation paper:

Our project is tasked with installing innovative tidal turbines in the Shannon river and, as with other innovative renewable energy technologies, we will require support to enable the project to achieve commercial viability.

In a submission previously made as part of the RESS consultation process, we had looked for a reduction to the *Minimum Offer Quantity* required for Community Led Projects to 0.5 MW and this request was acceded to. However, the maximum 400kW threshold specified in article 12 of the Regulation means there is no overlap between these two and any Community Led Project in the RESS scheme will not be given priority dispatch.

It is our concern that any Renewable Energy project that doesn't have priority dispatch is carrying a higher level of financial risk, as it will be subject to energy balancing actions by the TSO (as set out in your Question No 6).

We are also concerned that the provision for innovative technologies, set out in Article 12 2(b), is too restrictive as it doesn't allow priority dispatch over the lifetime of the project. It is our contention that the dispensation given does not address the additional financial risk mentioned above in any meaningful way. For example, in our project, it is envisaged that the "demonstration period" for the water turbines is for one year, though the lifetime of the water turbines is 20 years. It would be very beneficial if dispensation for priority dispatch would be available to qualifying Community Led Projects for the duration of their participation in a RESS auction or any initial Power Purchase Agreement.

Consultation Question 10: Feedback is requested from interested stakeholders on the types of demonstration projects that may be suitable for an application process for limited priority dispatch eligibility.

As a project we had looked to make a direct comment to your Question 10 but on reflection it is difficult to answer that question directly; As is mentioned in the consultation paper, the Regulation has defined a demonstration project and we would contend that this threshold is high enough and there is no need to try to sub-divide demonstration projects any further.

To summarise, if a project can successfully demonstrate that they fit the criteria of a "Demonstration Project", then they should be entitled to priority dispatch for an agreed period. It is hoped that this period reflects the community risk associated with local electricity generation and contractual obligations such as RESS auctions and PPA's.