



*Making renewables Ireland's primary power source*

March 27<sup>th</sup> 2009

Andrew Ebrill,  
The Commission for Energy Regulation,  
The Exchange,  
Belgard Square North,  
Tallaght,  
Dublin 24.

***Re: NOW Ireland Response to CER Consultation CER/09/031 Treatment of Conventional Generator Connection Applicants***

Dear Mr Ebrill,

NOW Ireland the National Offshore Wind Energy Association of Ireland was established to promote the development of Ireland's substantial offshore wind resource and to ensure that our island leads the way in building a sustainable, green economy. The founding companies of NOW Ireland (Airtricity, Codling Wind Park, Fuinneamh Sceirde Teo, Oriel Windfarm and Saorgus Energy Limited) have the potential to generate up to 3GW of energy from existing resources. Our primary goal is to make renewable energy Ireland's primary energy source.

In respect to the consultation, NOW Ireland is disappointed that this consultation actively excludes offshore wind generation which seems contrary to the EU priority access, priority dispatch rules and principles. Furthermore given the size of the fully consented projects outside Gate 3 (2.1GW)<sup>1</sup> which are a magnitude larger than any of the thermal generators wishing to connect there is merit in considering them more like conventional plant.

NOW Ireland accept a certain amount of conventional plant will be required to be added to the system to provide for back up. However offshore wind delivers considerably higher load factors, offering between 1.5 and 2 times the efficiency of onshore wind. With improved days ahead forecasting, it can be treated more like conventional generation thus allowing an effective balance and energy mix to be maintained and planned for on an ongoing basis. Consequently we would advocate a reduction in new conventional generators and a greater emphasis on large scale offshore wind coupled with improved European interconnection.

The Gate 3 system will administer grid offers for 3,900 MW of renewable energy projects. Of this 784.8 MW of Offshore wind is within Gate 3. Given that Gate 3 is set to deliver the 2020 renewable energy target of 40% it is not apparent which projects within the system will proceed to construction. To date there are no criteria in place to assess the developer's financial commitment to deliver or if the

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<sup>1</sup> Both Codling Wind Park and the Arklow Bank Projects combined are fully consented (but outside Gate 3) for the installation of 420 wind turbines. Assuming 5 MW offshore turbines are utilised this equates to a combined installation capacity of 2.1 GW. This figure could be increased as the generating capacity of offshore turbines continues to scale up.

necessary planning consents have been obtained. Without such criteria being applied there is no demonstration of a readiness to build in place.

NOW Ireland believes that due to its capacity, its large scale and the challenging nature of offshore construction that the remaining projects should be considered through a parallel process or a specific offshore Gate. The significant benefit of this could reduce the amount of conventional new plant required as large scale offshore wind can be considered a flexible fuel source. Additionally large scale offshore wind would considerably add to the energy mix. Furthermore offshore wind allows for flexibility in the system and contributes towards a more balanced fuel portfolio that maintains a public interest benefit.

NOW Ireland members welcome that the commission will continue to reserve the right to direct system operators to issue an offer to any generator connection applicant if warranted on security of supply, competition, environmental or other grounds. Large scale offshore wind fits into each of these criteria.

In considering the offer process NOW Ireland would advocate applying the small steps approach. Adapting this process will as the consultation notes prevent "lock in" thus giving the regulator flexibility to maintain a diverse portfolio over the coming years. This approach still leaves the door open to reducing the number of new carbon based conventional plants and allows for a greater emphasis on large scale offshore wind. Were the big bang approach to be adopted it would not allow for large scale offshore wind to be considered yet alone allow for it to be delivered in the next 15 years. This would be a missed opportunity for Ireland.

NOW Ireland considers interconnection will allow for improved security of supply and presents an opportunity for energy export rather than Ireland's continued reliance on energy importation. Our members would support the ring fencing of interconnector offers. Interconnectors within the system play a critical role for large scale offshore wind as they support and allow for energy trading. Furthermore within the context of the pan European offshore Supergrid they will facilitate the deployment of large scale offshore renewable energy.

Now Ireland would welcome the publication by the CER of a consultation that would specifically cater and develop a timeline for large scale offshore renewable energy delivery and deployment. In considering that the consultation on the treatment of small, renewable and low carbon generators outside the GPA (CER/09/044) will not allow for this, NOW Ireland would formally request the publication of a consultation that will deal specifically with grid connections of offshore renewable energy sources.

If you have any comments or require further clarification on any of the points raised in this response, please feel free to contact me.

Yours sincerely,  
NOW Ireland

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Séamus Mc Cabe  
Committee Member