



21st November 2008

Commissioner Michael Tutty,
Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

Re: Submission on the Commission's Publication CER/08/226 "Criteria for Gate 3 Renewable Generator Offers and Related Matters"

Dear Commissioner,

We wish to make a submission on the Commission's "Proposed Direction to the System Operators" as follows;

1. While the members of NOW Ireland welcome the inclusion of three of the five offshore wind farm projects in Gate 3, we believe that, due to its capacity, large scale and the challenging nature of offshore construction, remaining offshore projects should be considered outside of the Gate system.
2. We welcome CER's proposal that the land access requirement for Gate 3 for offshore will be met by the issuing of the relevant Foreshore Licence (and not a Lease). We believe that this will be adequate to meet the CER's need to avoid 'land' disputes.

Yours Sincerely,
NOW Ireland

Brian Britton
Secretary