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Kilmallock Rd  
Charleville  
Co. Limerick

5<sup>th</sup> December 2003

Ms. Claire Beaussang  
Commission for Energy Regulation  
Plaza House  
Belgard Road  
Tallaght  
Dublin 24

Dear Claire,

**Re: ESBNG Proposal to Limit Windfarm Connections.**

The ESBNG's call to 'freeze' windfarm Grid Connection processing is abrupt. If Grid Connections are delayed or stopped windfarm developers will suffer significant investment losses. It is clear that this erratic management of the industry will be detrimental to the development of an energy resource which has great potential for Ireland.

The ESBNG's concerns are real issues that have to be dealt with. However any of the proposed solutions appear to involve considerable time delay:

1. Establishment of a UK Inter-connector. This would allow a much higher level of electricity supply security, while at the same time allow the development of a natural resource in the country with large export potential.
2. Technical advancement of Wind Turbine technology is unlikely to have significant impact considering that the fundamental issue is that the wind turbine's prime mover, the wind energy source, is not controllable.

A reassessment of the actual scale of the threat that windfarms are likely to pose to the security and stability of the electricity system is needed, bearing in mind the past slow rate of actual wind energy development that resulted from successful developers in AER competitions.

The scale of individual wind energy projects has been increasing. This has led to a few developers dominating the industry. The 60 MW project at Derrybrien, has given detrimental publicity to the whole industry, before ever being connected to the grid. Large economy of scale type projects have smaller development costs per MW installed, and will suffer less loss of investment per MW if their development is now impeded. As a source of energy these projects are more vulnerable to localised wind fluctuations than smaller widely distributed windfarms. They also offer smaller returns to and are less accepted by communities in the remote areas in which they tend to be based.

Rather than now stopping the whole wind industry in it's tracks it would make more sense to stop or delay a small number of large projects. Many large developers are already operating and generating income from the wind industry and can more easily recuperate investments lost in projects that are not immediately developed. Small scale and particularly first time developers with planning permissions achieved and outlays of up to 30 to €50,000 already incurred should be allowed continue to obtain Grid Connections to enable them develop their wind farms and recover their investments.

Regards

John Clery

Slieveveagh Power Ltd