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Commission for Energy Regulation,
Plaza House,
Belgard Rd.
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DRAFT

Attention: David Naughton

Submission to CER

in response to consultation

"Resuming Connection Offers to Wind Generators,
Proposed Direction to System Operators"

cer 04/354, November 2004

(further to cer 04/317, 30-9-04 and cer 04/319 & 321 of 6-10-04)

on behalf of:
Simone O'Neill
Garrett Sinnott
Aidan O'Neill
Myles Kehoe
Lester Rothwell
Thomas Kehoe
Ian Bailey
and Myles Nolan
Wexford,

otherwise known as the Ballycadden Group.

Final version will be for publication, 29th November 2004/final, gch

Further to our submission of October 25th, in response to your proposal on the Group Processing Scheme.

Others, such as Meitheal na Gaoithe, have addressed the broader issues, and there is no need for the Ballycadden Group to elaborate on or repeat them all.

The Ballycadden Group welcomes the fact that their projects have been taken into Gate 1, and look forward to individual offers within months.

However, as already stated, the Ballycadden Group would prefer not to be treated as part of a Group that involves other projects outside their immediate area, and certainly not outside the Ballycadden Group as far as the physical connection is concerned. Such an approach is likely to compromise the understanding that has come to exist within the existing Group on shared asset cost and so on. There is a considerable risk that failure by a neighbouring project to complete would lead to over design and extra cost, or a lengthy redesign, delay and failure on planning grounds/PPA time limits or whatever. The Group would prefer if possible to stick with some version of the Group connection design it has already commissioned.

An important issue raised by Meitheal na Gaoithe concerns the payment schedule. We reject completely the idea that we should be asked to pay 100% of the shared asset costs at Offer Acceptance. The justification by TSO and DSO for this approach is not sound, as it is based on a worst case of complete abandonment of the project after funds are committed. This is extremely over cautious, at the expense of generators. This type of rule will never be needed since no project will be able to get to that point in the first place. It is a self-fulfilling prophecy, as it ensures projects will not succeed. CER should stick with the well-established 25% at Offer Acceptance, otherwise we will fulfil the TSO and DSO's worst fears by being projects that can't complete.

In general, the Ballycadden Group agree with Meitheal na Gaoithe that it is essential as soon as possible to change the connection policy in Ireland, if only to help unblock the logjam that now exists.
