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Mr. Denis Cagney,
CER- Networks Director
Plaza House,
Belgard Rd.,
Dublin 24.

21st November 2004

**Re: Submission on behalf of Tradewinds Energy Limited
P55(1) TG22 – Athea Windfarms & DG04 –Gate 1 Omission- Final
Information delivered on time. It therefore should be properly included
in Gate 1.**

Dear Mr. Cagney,

I am making this Submission and proposing an amendment to the first paragraph in the “Commissions’ Proposal” at point 16 of the paper (cer04/354), as follows:-

“The System Operators will give immediate priority to issuing connection offers to those 33 (?) applications which had met their completion requirements by 3rd December 2003, **even if deemed complete after that date**, and which, the Commission understands, amount to a total export capacity of 330MW (?)”

We would also submit the following:-

1. It is unfair not to include those who had provided all information to the TSO/ DSO by the date of the moratorium, **since they were not in a position to then influence the TSO’s declaration of completeness;**
2. There were **considerable delays** at the TSO in the lead up to the moratorium, which would place such projects behind the cut-off date through no fault of their own; In addition, it can be argued that with the further and repetitive information, required by the ESB National Grid that there was another agenda in play i.e. that TG22 was interacting with the Aughinish Application and also the Application at Tynagh, both fossil fuel based. With TG22 and many other wind applications being lodged, these

may have spoilt the party for ESB National Grid. Perhaps the Freedom of Information might help to establish what actually went on.

3. The approach currently applied by ESBNG relies on the absolute **consistency and punctuality of internal operations of TSO, which claims to be under-resourced.**

4. It appears that there is only one other project other than TG22 and DG04 which has been excluded and this relates to a small project DG116 (1.7mw) we understand.

5. CER in allowing the criteria of a two stage process between Gate 1 and Gate 2 now wish to introduce new criteria which will cause chaos with the grouping system in Gate 2 with very unclear time scales. We would submit that acceptances to offers must be made within thirty days for Gate 2. **In addition, we would submit that Gate 2 be no more than 1 month after the closure of Gate 1.** Any unused capacity in Gate 1 must be immediately made available in Gate 2 and in the order of the completed Applications if there is to be a consistency applied along and across the board. We would also submit that in the building and orderly development of an extended National Grid that where necessary transmission would take preference over distribution.

6. With Gate 2 and thereafter, there is no urgency for CER to create any additional capacity bearing in mind that the EU Directive targets have been met.

Kindest Regards,

David FitzGerald - Managing Director