



Irish Power Systems Limited

Response to “Proposed Direction To System Operators” CER/05/010

Irish Power Systems Ltd. have a number of concerns regarding the CER proposal for group processing of connection applications made by “renewable generators”:

1. Our first concern relates to the background to this proposal as outlined in the document itself. All the problems that have led to this proposal, all previous documentation circulated by the CER on such matters as group processing, and the moratorium itself all related to wind generator connections. Now, suddenly, all connection applications for all other renewable technologies are included even though they have not contributed to the problem themselves, and despite the fact that they offer a much more reliable and in many cases despatchable product.
2. Our second concern relates more specifically to landfill gas projects. Unlike wind, landfill gas generation has a limited life span on any given site. Extended delays in receiving grid connection do not just push projects back they prevent them happening at all.
3. That leads us to our third concern that relates to environmental matters. Landfill gas utilisation not only improves the environment by displacing fossil fuel generation, it also prevents the gas from having to be flared or from escaping into atmosphere, and the consequential effects this would have to the environment. Unlike other renewable technologies where delay is an inconvenience a day's delay in project commencement is a day's energy lost forever. More particularly, the generation of landfill gas presents environmental and health & safety issues that are dealt with in a generation scheme. In a month, nearly 0.5M cu. m of gas per 1MW of potential generation is produced in landfill sites of which 50-60% comprises methane (a greenhouse gas roughly 20x more harmful than CO₂).

In short, Irish Power Systems Ltd believes there are distinct and substantial disbenefits, not only to the proposed generator but also to the community at large if landfill gas connection applications are treated in the same manner as the proposed wind connection application treatment. Landfill gas generation does not give rise to large unpredictable fluctuations in output and is therefore a more robust form of power-generated energy than presented by wind generation. The effects on the distribution system are therefore more readily assessed and reliable.

Our view is that we could accept: the principle of a Group Processing regime where this applies and also the basis of connection charging. What the landfill gas technology should not be subject to is the Gated, ordered application processing regime presented in the proposed direction. The consequences are that this relatively small and stable technology will be inordinately delayed by the much



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larger and complex wind proposals, and that in many cases projects will simply not go ahead.