

Wexford Energy Management Agency Ltd.

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9th February 2005

Commission for Energy Regulation
Plaza House
Belgard Road
Tallaght
Dublin 24

Re: Standard Pricing Approach for Generators

Dear Aidan,

I am writing on behalf of Wexford Energy Management Agency Ltd. (WEMAL) with regard to the proposed Standard Pricing Approach for Generators and subsequent TSO/DSO submissions regarding same.

WEMAL is a European SAVE Agency established by Wexford County Council and Wexford Organisation for Rural Development (WORD). A component of WEMAL's remit is the development of locally based renewable energy systems and it is in this context that we submit the following concerns:

- The proposed 30 day acceptance period for connection is too short and the requirement for complete payment at this stage places considerable financial pressure on smaller developers.
- The 30 day acceptance period does not allow the developer to secure planning permission for the proposed grid connection works. Thus, a developer must commit funds to a project that may or may not be permitted to proceed.
- Where a connection is not accepted the group processing procedure will result in further delays and increased connection costs for the accepting developer(s).
- The connection cost set by ESB Networks is not subject to competition pressures. Some form of tendering at this stage would at least improve the competitiveness and value of the connection fee for a developer.
- Shared connection plant adds another layer of project complexity to the developers within a subgroup.
- Is there a possibility that PSO funding could be used to off-set renewable energy connection costs. Current PSO expenditure on renewables is very low compared with expenditure on non-renewable peat fired power generation, yet the delivered output of the former greatly exceeds the latter.

We would appreciate if these concerns could be addressed by the CER. This would go a long way in assisting the development of locally based renewable energy systems in accordance with Government targets for sustainable energy development.

Yours sincerely,

Neil Foley

Technical Officer.

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Wexford Energy Management Agency is supported by:



Wexford County Council



Wexford Organisation for
Rural Development



European Commission Directorate
General for Energy and Transport