

**Subject** : **Comments on Proposed rule changes WPDRS 2007/2008**  
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**Dated** : **19<sup>th</sup> September 2007**

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**Comments on proposed rule changes Winter Peak Demand Reduction Scheme  
2007/2008  
CER/07/131**

**1 Calculation of Reliability Payment**

This rule change is noted and is welcomed.

**2 Calculation of rebate**

This rule change is noted and is welcomed.

**3 Benchmark energy**

This rule change is noted and is welcomed.

**4 Demand side bidding**

Fingleton White sites will not be participating in Demand Side Bidding therefore this rule change is not relevant.

**5 Historical Data**

This rule change is noted and is welcomed.

**6 Baseline calculation**

Under the current WPDRS rules 07/08 Baselines are calculated on 06/07 historical data for the WPDRS period resulting in uneconomic Baselines for many eligible customers who contributed reliable peak reduction in 06/07 WPDRS. Therefore there is no incentive to participate in 07/08 WPDRS and continue reliable winter peak operation. The only option for such a site to regain a favourable Baseline is to shut off generation for peak hours for a full WPDRS season, which is contrary to the spirit of the scheme. The rules should be modified to the benefit of both EirGrid and customers by incentivising such customers to continue to participate and maintain reliable operation and peak load reduction. Setting the Baseline for such customers to the Baseline level for the site demand without onsite generation would make it worthwhile for these customers to participate.

For sites that operate principally in the summer months, for example milk production plants, and operate for WPDRS hours only the baseline should be calculated on the average consumption outside 17:00 – 19:00 in the historical period November to March as the average consumption between 17:00 – 19:00 is not an accurate reflection of the base load.