

**From:** Tim Murphy, SAV Energies: IWEA member

## 2. Installation Process for Micro Generation

### 2.1. Technical Considerations

#### **Request for Comment**

The Commission seeks comments on ESNB proposal to set initial penetration limits of 40% of the total installed micro generation capacity on the existing low voltage substation.

This is a difficult question to answer without knowing the amount of power that a low voltage substation can provide. My ESB colleague informed me that 10kV substations can power between 50-100 residential homes. If this is the case then 40% is a very reasonable number to start with.

### 2.2. Notifying the Network Operator

#### **Request for Comment**

The commission is of the view that the approach adopted for the installation of micro generation units should ensure timely information is provided to ESNB minimising the risk that noncompliant units will be installed and aiding management of the networks in a climate of increasing micro generation.

The Commission requests comments on the “inform, consent and fit” approach from interested parties.

Yes, I do agree there should be an “inform, consent and fit” approach

### 2.3.1. Informing ESNB of Installation

#### **Request for Comment**

The Commission requests comments on ESNB’s proposed approach to the implementation of the inform, consent and fit approach in Ireland. In addition, comments are requested regarding the Commission’s alternative approach as outlined above and, in particular, whether a register of approved micro generation units should be maintained and if so who is the appropriate body to do this.

Yes, I agree that the commissioner’s approach to use a register appears to be a better approach than the one suggested by the ESNB. I also agree that the ESNB should be the body to manage this register with CER as its watchdog.

However, I disagree that this register should be public as it is unfair to the vendors selling systems. A vendor can spend a considerable amount of time and money getting a manufacturer’s unit to pass the required tests. If the manufacture’s name and model are public what is to stop another vendor waiting to see what units are registered by ESNB and then employing these units in their systems at no expense to them.

### 2.3.3. Enforcement and Practical Implications

#### **Request for Comment**

The Commission requests comments on the proposed consenting and fit processes as outlined above. Comments are also sought on the area of enforcement and practical considerations in relation to informing interested parties of the need to inform ESBN of the intended installation of micro generation.

My view is that absolutely every time there is an installation the ESBN should be informed.

This section of the document raises many significant issues but it does not tackle them; there needs to be very strict enforcement procedure. This section is far too loose. The fear I have here is that without strict procedures there could be unsafe units installed which could damage public safety along with the future for micro generation.

### 2.3.6 Licensing and Levy Order

#### **Request for Comment**

The Commission seeks comments on the principle and level of the proposed application fees and the exemption from payments in respect of the Levy Order for micro generators.

Yes, I agree that there should be no levy; we need to give every incentive to the customer to adopt micro generation.

### 3. Metering and Commercial Arrangements

#### **Request for Comment**

The Commission requests comments on the payment options for exported energy and metering options outlined above and any other proposals on payments.

I am afraid that I am very disappointed in the Commissioner's view on metering. I would like to point out that without a metering system that rewards the customer you are putting the customer to a huge expense. With a beneficial metering system the customer can choose not to use batteries in his/her system as the grid effectively acts as a battery. Batteries can add more than 40% to the cost of a system depending on the site and the weather conditions plus they require constant maintenance. This extra expense makes the system payback period well over 10 years which most customers view as unacceptable.

I would urge the Commissioner if he is not going to introduce some form of beneficial metering at this time to put a marker down and say when is the latest date that Smart Metering will be introduced. I will have to inform my customers that at present there is no beneficial metering and if I were them I would wait until Smart meters are introduced. So in the meantime, I believe the current Commissioner's view is detrimental to the customer take-up of renewable micro generation.