

Subject: Comments on Arrangement for Micro Generation
Consultation Paper
CER/06/190
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1. **Initial Penetration Limit**

We agree with the initial penetration limit of 40% of the total installed micro generation capacity on the existing low voltage substation.

2. **Application Fees**

Section 2.3.5 of the Consultation Document outlines the current situation whereby the application fee for a generator of less than 4MW is €7,880. This Consultation Document proposes a fee of €20 for single connection less than 50kVA.

We agree with the proposal for a reduced fee. We believe that the reduced fee of €20 should apply up to 100kVA and should be graduated in further steps in an effort to promote Micro & mini generation and embedded generation.

3. **Export Electricity**

DUoS Charges

The argument in Section 3.3.3. is flawed. DUoS charges are part fixed and part commodity, this is to reflect costs. The end consumer pays the DUoS charges. If a micro generator consumes less units, then he pays less DUoS commodity. This is cost reflective and is not a subsidy. If the micro generator is exporting then the exported units are consumed locally and DUoS commodity is charged on those units.

Export Electricity Price

Prior to the implementation of the SEM the micro generator should be paid at least top up price (or better as negotiated) for exported electricity.

Once the SEM is in operation the current proposal is for embedded generation to be treated as negative supply.

Metering

A choice of metering arrangements should be available to the micro generator allowing the micro generator to evaluate cost/benefit analysis for each site.