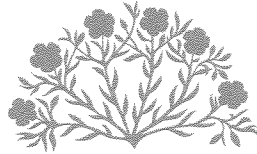


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DATE RECEIVED: 13/11/06

Mr Paul Hogan
Commission for Energy Regulation
Plaza House
Belgard Road
Tallaght
Dublin 24
7 November, 2006

Reference; consultation document on micro generation in an all-island energy market

Dear Mr Hogan:

I am writing to express the concerns of Sinn Fein on your proposal to effectively block "net-metering" as a method that consumers can use to install and finance micro generation units in their homes or businesses.

If one of your first acts in an all-island context is to block consumer-led installation of microchip, PV or wind by not allowing two way metering and "netting off" imports and exports over the year, you will bring the all-island market into popular disrepute very early on in its genesis.

There are forces who would prefer the all-island Market for energy to fail, and will use this proposal by the CER to show why it is a mistake.

I would urge you to seize the opportunity of net metering as a method whereby the CER and its counterpart in the North can implement a popular policy not traditionally supported by the ESB or Veridian thereby demonstrating their independence from the incumbents.

Sinn Fein members and supporters here in the Six Counties have installed PV systems, micro wind and systems needing to be powered by electricity like ground source heat pumps or air source heat pumps that can benefit from a net metering policy. **All distributed energy systems should be able to benefit from net metering.** Thus a ground source heat pump driven by a micro wind turbine, or the pump on an active solar system should be allowed to offset and the CER should encourage "suites" of systems to encourage consumers to deal with not just their power, but their heat and hot water too as part of an overall net-metering package.

Many of our party members have worked in the building trade in New York, Boston and in the East Coast in the USA given the difficulty with finding work here in the past. We have had practical experience of net metering going back to the early 1980's and can assure you that there are no technical issues that are outstanding with this technology that have not previously been dealt with by electricity regulators or the Institute of Electrical Engineers. We would urge you to do a bit more research on this matter.

If properly qualified individual electricians are installing systems pre-approved by the two regulators from a data base of systems kept by the grid operators, there is no reason why these systems cannot be installed by reputable companies onto the grid without the prior permission of the grid operators.

Is mise le meas

Cllr Willie Clarke MLA
South Down Sinn Féin