

Dear Paul,

My comments:

1. This document is welcome. It should have been published years ago. The CER have a statutory duty to promote renewable and sustainable energy under the 1999 Electricity Regulation Act that established the CER. Why has it taken so long to produce this document?

2. I have no comment on the 40% limit ESNB proposes of micro generation capacity on substations. This is a safety issue and I do not have the necessary expertise.

3. The "Inform, consent and fit" approach is fine where consent is automatic if ESNB do not respond with 10 working days. It must be possible to "inform" ESNB via the internet so that renewable energy vendors may apply on behalf on consumers. This will ensure that the "inform" process does not become a bureaucratic barrier to micro generation.

4. The CER approach to "inform, consent and fit" is better than the ESNB proposal. ESNB should maintain the register of approved grid tie inverters/generators on their website. An applicant should be able to select an approved model from a drop down list when "informing" ESNB via the internet.

5. 10 working days should be sufficient for ESNB to decide to object to an installation where the grid tie inverter is of an approved type.

6. Micro generators and inverters should be type approved to IEC standards for safety, noise and power output. In addition, they should CE marked and comply with relevant EU directives. The UK Clear Skies scheme applies these rules. Grants are only available through approved installers who install approved equipment. The CER should outlaw the sale of generation equipment that do not meet IEC standards.

7. There should be no fee for single connections less than 50kVA. It would just be a tax on the poor and would discourage use of RES. There is some logic to fees for larger installations.

8. The CER claim "All electricity generators in Ireland are required by law to have an authorisation to construct and a licence to generate electricity". This is nonsense. It would mean motor vehicles, trains, planes, solar powered calculators and garden lights, certain cigarette lighters, diesel and petrol generators, wind turbines on sail boats etc, all of which generate electricity, would require a CER licence. A CER licence is required where electricity is for sale or "for supply to final customers". This would apply to grid tie micro generation equipment where the micro generator may spill power onto the grid. That the CER is prepared to automatically licence all micro generators under 1MW is welcome. There should be no licence fee for micro generators less than 1MW.

9. Spill payment. It is public policy to encourage renewable energy use. See the Green Paper on Energy, Oct 2006 and the Óireachtas Joint Report "Review of Energy" June 2006. The CER has a statutory duty to encourage renewable and sustainable energy. Where micro generators based on renewable energy are installed, net metering should be allowed. The customer should pay the costs of installing a CER approved smart meter. I agree "ESNB will under recover their revenues for micro generation customers and the short fall will have to be taken up by all other customers and DUoS charges will rise." This will have the effect of *encouraging* the use of micro generation based on renewables. I find it extraordinary that the CER, given their statutory duty and public policy rule out Net Metering, the mechanism that will reward RES use most.

All in all a good paper.

Kind regards,

Dermot

Paul Hogan <phogan@cer.ie> wrote:

Dear Mr McDonnell,

Your query was passed on to me as I am dealing with this issue of microgeneration. Apologies for such a long delay; since June of this year, but it seems that your query was overlooked.

The answer to your question is that there are currently no such arrangements in place. Just today I published a consultation document exploring how, among others, these arrangement that you mentioned might work. This is available on the CER web site but I attach same for your convenience.

Perhaps you could consider this document and forward any comments you would have.

Regards,

Paul.

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From: Dermot McDonnell [<mailto:dermotmcdonnell@yahoo.co.uk>]

Sent: 08 June 2006 22:14

Subject: Connection of microgenerators to the Grid

Hello,

Can you please advise me of the CER position on connection of microgenerators (less than 6kW capacity), such as small wind turbines or PhotoVoltaic, to the low voltage grid?

Thank you,

Dermot.

Send instant messages to your online friends <http://uk.messenger.yahoo.com>

"My Verdict: [The new Yahoo! Mail](#) is far superior..." – The Wall Street Journal.