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Mr Paul Hogan
Commission for Energy Regulation
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Dear Paul,

We welcome this opportunity of responding to your consultation paper on “Arrangements for Micro generation” as this is an area in which we are interested.

As a general comment, every avenue for capturing and using renewable energy should be taken in view of the mounting evidence on global warming and the need to take corrective action. Therefore this consultation paper from the CER is very timely.

Setting initial penetration level at 40% of LV substation capacity

It is prudent to take a mid value at the outset so that there is no delay in developing guidelines and procedures for connecting to the network. As the paper suggests this can be reviewed with experience. However, in order that it is not left entirely aside it would be prudent for the CER to request that a review be conducted within two years. The extensiveness of the review should be set by the CER and can depend on the level of connection in the intervening period.

Comment on Notifying the Network Operator

We suggest the most important matter in developing these guidelines and procedures is that they are simple, straightforward and standardised. For example, as suggested in the consultation paper, a register of approved micro generators should be prepared and published by ESBN on its website (with regulatory oversight). This will allow interested parties to check against this register when considering purchasing a micro generator. To be placed on the approved register, vendors would submit all required technical data, certification, test results, etc for their micro generators and interface equipment so that prospective purchasers would be spared this detail and the attending cost. In this way, micro generators on the approved register will comply with all requirements whether technical, protection, safety etc.

Comment on ‘Inform, Consent and Fit’ Approach

The electricity industry in Ireland has an excellent safety record and connection of micro generation should not result in any diminution of safety. The ‘Inform, Consent and Fit’ approach is consistent with maintaining those safety standards. However, we suggest the most important matter in developing these guidelines and procedures is that it not a highly



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bureaucratic procedure. It should be no more difficult that when someone has upgraded the wiring in his/her home and furnishes a certificate of readiness to get the ESB tails upgraded.

Documentation to ESBN & CER

Again this should be standardised as much as possible. The first page of both forms should be identical, requiring the same information. The second page/section should collect the specific information required by different parties.

Levy Order

Micro generators should be exempt from paying the levy order. The costs associated with implementing/collected the levy would outstrip the likely revenue.

Metering

The present domestic or small commercial/industrial metering employed is not practical for metering any exports from Micro generators. Similarly, the cost of QH (profiled) metering is not commercially viable. We suggest that no changes be required to existing metering in order to comply with installations requirements. The value of electricity varies enormously over the course of a day/week/year, and so it is impractical that any supplier can agree to net metering. However, with the expected developments in smart metering these can be installed at a later stage if found to be commercially beneficial. For example, these could aggregate imports/exports over several (four) periods in a month, e.g. nights, weekdays non-peak, weekdays peak, weekend days.

Signed

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