

Hello Paul,

In relation to the consultation CER/06/190, I have two short comments:

#### 2.3.1. Informing ESNB of Installation

I agree with the commission on the establishment and maintenance of a register of approved types of micro-generation and that the list should be maintained and should be made available to the public. The Commission believes that the ESNB would be the appropriate body to maintain this register. This is appropriate **only once** there is a regular scheduled review of the register and that any unit subsequently shown to be TCTRS compliant is added to the register within a defined time period to avoid the ESNB's maintained register being potentially used as a block to the connection of micro-generators. The CER **must** assure the maximisation of micro-generation in the country and should not tolerate any potential impedence to the full utilisation of this resource that has a huge, underestimated constituency.

#### 3.3. Payment Options

The most appropriate method of paying for legitimately micro-generated energy is to record the net energy at generating source, program all DUoS and other relative levies at source and directly upload net data to the DSO for billing. This is 2006, this is been done elsewhere so let's be present thinking!

Also, in section 2.3.5. Application Fees, it is stated that "Currently the application fee that applies to generators is covered by the schedule of charges approved by the Commission in 2005. For a generator less than 4MW the application fee is €7,880. However at that time little or no account was taken of micro generators connecting to the network." I find this startling - that when the CER was establishing the 2005 schedule of charges that no one in ESNB or the CER was thinking about micro-generation! It was on the lips of everyone else even in the remote edges of the energy industry so why not in the CER?! Sorry for been negative but I did find that amazing when I read it!

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Best regards,

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