

CER

Attn. Mr. Paul Hogan

Thank you for the opportunity to comment.

R.McGrath

Eur.Ing.

My Comments.

1. Appendix 2 relates to lab type testing **total microgenerator system** (prime mover + generator + convertor (if used) + grid interface protection as a complete system.

This approach is far more onerous than exists for large generators as it eliminates flexibility between prime mover , generator , convertor and GIP.

This overcontrolling approach is a major barrier (noting system trip protection at PF of +_0.95) ie asynchronous generators cannot be used , these are common in water turbines.

This proposal would mean in practice that for example a millwheel (hydro) prime mover with 3500 potential sites countrywide) cannot connect as a type approval **cannot** be obtained for complete system.

Therefore appendix 2 should relate to test of GIP only

An analogy to the CER proposal is like saying the domestic washing machine , switchboard , wiring for a house must be tested together as a system and ESB has to get involved and approve a register of washer, wiring, switchboard systems and review their lab test results of each system .This does not appear to be the business of ESB and they should not be allowed create more barriers. Note the domestic wind turbine has a similar power to a washing machine.

2. CER proposal is spill is unpaid so no incentive to spill , customers can be required to prevent spill to system therefore eliminating voltage rise concerns. (reverse power relay).

3. ESB Insurance requirements for all generators and distribution code impose additional barriers.

4. When a Generator is fitted ESB insists on changing tariff from residential to commercial (recent case available on request) this is a residential microgenerationbarrier.

ph +353 5677 71144

Mob. +353 86 2532484