



Paul Hogan  
The Commission for Energy Regulation  
The Exchange  
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Tallaght  
Dublin 24  
Republic of Ireland

Fred. Olsen Renewables Ltd  
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64-65 Vincent Square  
London  
SW1P 2NU

3<sup>rd</sup> April 2009

Via E-mail & Post

Dear Mr Hogan,

***Re: Fred.Olsen Renewables Ltd. Response to CER Consultation  
CER/09/044 Treatment of Small, Renewable and Low Carbon Generators  
outside the Group Processing Approach***

Fred. Olsen has been involved in wind power since the mid 90's with presence in Norway, Sweden, UK, Ireland and Canada. Fred Olsen Renewables Limited (FORL) has 178MW of operational wind projects and a further 273MW consented in the UK and 1100MW consented just off the Irish coast, this makes FORL a major player in the wind energy sector. In addition, FORL are BWEA, SRF, IWEA and NOW Ireland members and are active on a number of the industry groups and FORL staff has been, and continue to be, involved with numerous industry working groups. FORL are joint owners, with Treasury Holdings, of the consented Codling Wind Park offshore wind farm (1100MW).

The proposal to have "non-wind" renewable generators outside the gate process is useful and demonstrates that it can be done with the current regulated regime. It continues to be a source of frustration that with only a handful of offshore projects currently in development it would seem appropriate to treat offshore wind outside the Gate 3 process too, particularly given that the two consented offshore projects in Ireland are not within the Gate 3 system. It is felt that with a complete lack of a specific offshore "gate" or processing connections outside the "Group Processing" principles, a tremendous opportunity is being missed for Offshore Wind.

If you have any comments or require further clarification on any of the points raised in this response, please do not hesitate to contact me.

Yours sincerely,

*G. Cooper*

**Graeme Cooper**  
Grid Compliance Manager  
Fred.Olsen Renewables Ltd