

Bríd O'Donovan
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

18 September 2009

Dear Bríd,

CONTESTABILITY FOR DISTRIBUTION & TRANSMISSION LEVEL CONNECTIONS TO THE ELECTRICITY SYSTEM

Thank you for the opportunity to comment on the above consultation.

Viridian Power and Energy (VPE) welcomes the long awaited introduction of contestability for distribution level connections. Depending on the accompanying rules, procedures and resources contestability at distribution level should provide developers with greater flexibility, and has the potential to both save time and money.

However, the potential benefits of contestability will not be realised unless a clear robust set of rules are developed together with design standards and specifications that are relevant to the application and are applied consistently by ESB throughout the country.

VPE would like to see a widening of the scope of contestable equipment to also include protection and communication equipment.

To enable contestability options to proceed in a timely manner, VPE would urge ESB to review and issue a complete set of standards/specifications by or before the Commission's final direction. In ESB's review we would welcome standards/specifications that are suitable for the location of installation e.g. installation of cable in rural areas, through bog and into

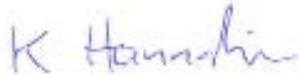
floating roads etc. We would also welcome flexibility in the application of standard cable and transformer sizes.

To achieve the potential benefits of contestability it is very important that ESB Networks allocate adequate resources across the range of activities especially in preparing and issuing standards and specifications, modification of offers, responding to technical queries, approving designs, site sign-off and the provision of suitable commissioners.

As drafted there is some uncertainty in relation to bonding requirements. VPE believe that further consideration and clarification of the application within groups should be given to this area before a direction is issued.

We look forward to further engagement with the CER and ESB Networks on the points we have raised in this response, and please do not hesitate to contact us if you require further clarification on any of these comments.

Yours sincerely

A handwritten signature in blue ink that reads "K Hannafin".

Kevin Hannafin
Senior Regulation Analyst