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**PROPOSED DECISION ON CONTESTABILITY FOR DISTRIBUTION AND TRANSMISSION
LEVEL CONNECTIONS TO THE ELECTRICITY SYSTEM**

Dear John

Thank you for the opportunity to respond to the above consultation.

In addition to our previous comments Viridian Power and Energy (VP&E) would like to note the following concerns and suggested solutions in this response:

2.2.2 Unanimity

The Gate 3 connection process will test this principle to the limit. In our view there is likely to be too many speculative generators involved with a large number of groups.

VP&E therefore suggests that if one or more generators have in excess of 90% of the MW in the group they should be allowed to contest the connection. As per the proposal under 2.2.1 the distribution system operator (DSO) can underwrite the "final customer" until that generator is connected.

2.2.3 Ownership

Question 1 – "additional benefits to owning the shallow connection?"

VP&E considers the main benefit of above that the generator could coordinate the maintenance of the grid assets with the turbine maintenance schedule. This would increase availability of the plant and ensure both high voltage and low voltage works are regularly carried out. The current situation is that the substation maintenance, although planned, moves at short notice to alternative dates. This is usually caused by delays or changes to the programme ESB Networks have to plan and this causes a knock on effect across the system. Subsequent notices are short, less than a week, and it is then impossible for the generator to re-organise the turbine servicing to match the alternate substation maintenance.

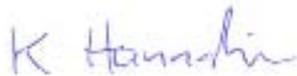
Question 2 – “are the criteria reasonable? – are assets required for system development?”

The grid development plan, Grid 25, is currently a movable feast and it would appear that even the most innocuous substation could be required for a major transmission upgrade. Most substations, if space was left of an extra GIS bay or two, could be developed further at a future date. Unfortunately there are considerable delays encountered at the moment (15 months +) while it seems Eirgrid/ESB agree what the system development requirements are.

We suggest there should be a specific time limit imposed on deciding if the asset is to be developed further (70 Working Days).

Please do not hesitate to contact us if you would like to discuss this or our previous response on the above issue.

Yours sincerely

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

Kevin Hannafin
Senior Regulation Analyst