



Confederation House
84-86 Lower Baggot Street
Dublin 2

James McSherry
Renewables
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

14 December 2011

Re: CER/11/189- Consultation on a Certification Process for High Efficiency CHP

Dear Mr McSherry,

CHP Ireland is the IBEC group that represents developers, suppliers and host sites of combined heat and power technology. The group welcomes the opportunity to submit comments as part of the consultation on a certification process for high efficiency CHP.

A mechanism for the identification and certification of high efficiency CHP, as required under Directive 2004/8/EC, is crucial for the recognition of combined heat and power as an environmentally-beneficial technology, and as a basis for providing support through existing and future national support mechanisms, in reward for such benefits.

It is our understanding that at this juncture the certification process will facilitate the granting of priority dispatch to the limited number of plants of sufficient scale that will be exporting to the grid, in addition to enabling the award of REFIT III to anaerobic digestion and biomass CHP plants. CHP Ireland believes that the certification process ought to be used as the qualifying criterion should the policy decision be taken to introduce broader support for CHP, including fossil-fired CHP, as an energy efficiency support measure.

CHP Ireland is strongly of the view that the certification process must minimise the administrative burden and cost to applicants, while ensuring the integrity of what is a complex system.

In its final decision on the matter, it would be useful if the Commission could clarify to what extent the proposed certification process meets Ireland's requirements under Article 5 of Directive 2004/8/EC relating to the establishment of a guarantee of origin of electricity from high-efficiency cogeneration.

Finally, regarding the approach to the classification of useful heat, CHP Ireland is of the view that any thermal use must meet the established criteria as either process heating (or cooling), space heating (or cooling), or for drying purposes. CHP Ireland would favour the consideration of recycled heat as useful under Approach 1, provided that the CHP boundary is sufficiently defined.

Should you have any queries in relation to any of the issues raised in this submission, please contact Conor Gouldsbury, Secretary to CHP Ireland, at 01-6051557, or conor.gouldsbury@ibec.ie

I wish to thank you in advance for giving our comments due consideration.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'JF', with a stylized flourish at the end.

John Fingleton
Chairman, CHP Ireland