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Certification of High Efficiency Combined Heat and Power (HE CHP)

Aughinish Alumina Trading Response to CER/11/189
14 / 12/ 2011

1. Introduction

Aughinish welcomes the opportunity to respond to the consultation paper on the certification process for high efficiency (CER/11/189). Aughinish have no objection to this paper being published.

It is the view of Aughinish Alumina Ltd that the promotion of cogeneration and HE CHP based on useful heat is of the upmost importance. As outlined in the EU directive 2004/8/EC there are numerous benefits for the state including reduced electricity costs, efficient use of energy and reductions in emissions.

2. Comments

1 Useful Heat

Classification
We believe that useful heat is any load which would continue to exist if the CHP plant did not. This load would have to be shown to be economically viable based on market conditions.

We believe that heat used in the preparation of CHP boiler feed water or the preparation of CHP fuel should be netted against the total heat export of the plant. This would be similar to the in-house power load of the CHP plant being netted against the total power generated.

Required information for Assessing Useful Heat
We accept that the initial certification or recertification under the final framework is likely to be an arduous task. This process could be streamlined somewhat through the use of generic templates with opportunities to add supporting documentation. This would have the added advantage of clarifying requirements to existing or potential HE CHP participants.

2 Calculation Methodology

The definition of HE CHP, Overall Efficiency and PES are as per the legislation and EU Cogen Directive.

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3 Calculation Methodology Information Requirements

The CHP Plant Design information is suitable

Clarification would be required in relation to climate adjustments, is it based on the average for the year or does the PES vary from winter to summer?

We feel that the submission of some of the required data will be repetitive each year. The renewal process should be accessible online with pre-populated data. Other jurisdictions (eg UK) have successfully implemented the facility of submitting the annual renewal information using .xml files, this should be considered by the CER.

4 Application Process

We feel that a single cut off date for subsequent applications is unnecessary and is a risk which could be mitigated by having quarterly acceptance dates. It could also lead to bottlenecking of the application process.

The proposed 10day window to get the first round of application forms submitted following the CERs decision paper being published might be unrealistic. It will depend on how well developed the application process will be and how well participants understand the process.

Additionally if a participant fails to make a submission within this 10-day window they might be penalised by not receiving certification for 2012.

Clarification would be required as to what level of certification is required on measurement devices.

5 Auditing Regime

We see no problem in large HE CHP plants being audited once a year.

Thanks for the opportunity to respond,

Yours Sincerely,

John Ryan

Energy Manager
Aughinish Alumina Ltd