

Attn:- Nigel Morris,
Commission for Energy Regulation,
The Exchange,
Belgard Square Noth,
Tallaght,
Dublin 24.

11th October 2013

Re:- Consultation on Installed Capacity Cap
CER 13/2/10

A chara,

I would like to make a submission to the CER in regard to the above.

EirGrid's Connection Offer Policy and Process Paper (COPP), Up date on installed plant 13/08/2013 has the following on page 5 ***It is questionable whether over installation should be available retrospectively to Windfarms already connected'***.

Corr na Gaoithe Teo. would like to comment as follows:-

We believe that it would be discriminatory not to allow the increased installed capacity for existing Projects. Allowing existing Projects to increasing installed capacity would seem practical from the following view points:-

- Efficient use of the Grid.
- Assist in meeting Government targets for Renewable Generation.
- Fair treatment of all Generators.

Corr na Gaoithe supports the proposal to increase the installed capacity to 120% of the MEC. We also believe that this should take account of the Turbine size been installed.

I will illustrate this by a practical example.

Sonnagh Old Windfarm has an MEC of 7.65MW. 20% increase would allow us 1.53MW. The turbines installed are Vestas V52 850KW's and its questionable if planning constraints would allow any other turbine size/type on this farm. If we are capped at 20%, we will be allowed install just one extra

850 KW turbine (or 11.0% additional installed capacity) whereas if an allowance is made for the next nearest turbine, we would be allowed install 2 turbines or 1.7 MW's. 1.7 MW's is only marginally over the 1.53MW and therefore we believe that this should be allowed.

In the case of existing or operational windfarms consideration should be given to the type of turbine already installed. There may be case for adjudication of the cap on a case by case basis by the CER.

Yours sincerely

Frank Ó Domhnaill
For and on behalf of
Corr na Gaoithe Teo.