

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

11th Oct 2013.
Fax:- (01) 4000 850

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

Dear Sir,

The above and EirGrid's 'Connection Offer Policy and Process Paper (COPP), Up date on Installed Plant 13/08/2013' refers.

I have extracted 2 key points from the conclusion (Page 5) in Eirgrid's paper as follows:-

Conclusion:

... ...'EirGrid would note that it is largely comfortable that an increase of up to 20% above MEC should not have a material impact on same due to the meshed and extensive nature of the transmission system.'

'The second consideration relates to the impact on the electricity end-user costs.the end-user should not be affected to any material degree '

Sheeragh Wind is in favour of the new proposed Capacity Cap of 120% and as it appears to have the support of Eirgrid and the CER it seems reasonable that the proposal will meet approval.

However, the following from Eirgrid is of concern:-

'It is worth noting that one of the main industry reasons for raising the cap appears to have been the mismatch between the timing of planning permissions and connection offers, and the turbine technology changes in the meantime. Therefore, if that is the primary concern, it is questionable whether over-installation should be available retrospectively to wind farms already connected'.

Sheeragh Wind contend that the Installed Capacity Cap should apply to all projects including those already connected. The primary concern of windfarms already connected (*or certainly that of Sheeragh WindFarm*) is that we optimise the capacity of the Grid Connection and the site itself.

Sheeragh Wind submits to the CER that when they are making a decision on this matter that in the interest of fairness the same rules apply to new and existing projects and that the 120% Installed Capacity Cap apply to all projects.

Sheeragh Wind has a second submission as follows:-

Existing windfarms will more than likely wish to increase capacity by installing the same turbines as those already operational on the project. Flexibility is required around the 120% rule and Sheeragh Wind propose that in relation to existing projects that they are allowed to install under the following rule set:-

- Target Installed Cap of 120%

- Where the same turbine is proposed as those already installed then the Generator be allowed construct up to the next turbine above the Installed Cap of 120%.

There are very practical reasons for this proposal. For example a 3 No. Enercon 2.3MW WindFarm with a MEC of 6.9MW and an Installed Capacity cap of 20% equating to a further 1.38MW would not benefit from the 120% rule unless there is an accommodation for the existing turbine type on site.

Small windfarms will suffer disproportionately if an allowance is not made and on that basis Sheeragh Wind requests that projects up to 10.0MW be allowed to install to 120% and over and above this to accommodate the marginal turbine. Indeed Sheeragh Wind has no objection if this rule were to apply to all projects

Yours sincerely

Eamon Ó Domhnaill,
Sheeragh Wind,
An Bóthar Buí,
An Ceathrú Rua,
Co. Galway
Phone:- (091)595585
e-mail:- Eamon O Domhnaill [eamon@aeolas.com]