

From: Shane Kenny <XXXXXXXXXX@XXXXXX.com>
Sent: 29 October 2021 18:48
To: Clean Export Remuneration <cleanexportremuneration@cru.ie>
Subject: Microgeneration Scheme

These are my suggestions having reviewed your consultation paper.

1 I think it is important that the CRU fixes a minimum price for CEG compensation. It is in the interests of all the companies to pay as little as possible for exported energy from micro producers, and there could well be a “club” approach to keep the price as low as possible. The fact that they are invited to compete on price does not necessarily mean that some companies will offer a tariff above the wholesale market average. They will also be conscious that they’ll be faced soon with the “premium” tariff when the second tier of the microgeneration scheme is rolled out, and companies will see themselves as subsidising the installation of micro generation to compensate for changes to the grants scheme.

2 This fixture does not have to be a sum of money - it can be a formula based on the monthly Day Ahead Market (DAM) average, so well illustrated in your consultation document, to deliver the average monthly price for wholesale electricity to micro producers. This could be shown as a credit on the two monthly bills of customers on their supplier accounts.

3 A fail safe floor price should be added in case there is a short term glut of wholesale electricity, that micro producers should get at least the equivalent of the company night rate for their supply of electricity.

4 To save on the costs of administration etc., all of the micro generation tariffs should be given in the form of adjustments to bills in the form of credits obviously spelt out in a manner that is transparent and easy to understand.

5 Not all customers will have smart meters. I got a totally new one 3 years ago at my house because of an extension, but I’ve consulted ESB Networks and I’m informed that even this very recent new meter is not a smart meter, despite it’s costly installation. However my Huawei Inverter and 10kW of battery storage are linked to the web with a website in the Inverter and can be managed with the Huawei Fusion Solar app which, with always on Wifi, giving a clear record of electricity export to the grid, as well as a number of other metrics on all the operations of the Solar System as well as my usage of imported electricity from the grid. I do not know what other systems record, but in order to keep abreast of technological developments, I think your decision should advise that in the absence of the complete rollout of smart meters, Fusion Solar and other such technical records of exports should be recognised by ESB Networks and the

companies as a valid record of exported electricity. Anything less would be a denial of modernity unfitting to an Ireland looking to the future. It is impossible to manipulate the record which is sealed inside the Inverter, and it can be double checked against the record of imports vis a vis the meter.

Thank you.

Shane Kenny

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