Kish Offshore Wind Ltd

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Kish Offshore Wind Ltd Response to SEM Committee Proposed Position Paper SEM -10-060

Friday, 12th November 2010

Kish Offshore Wind Ltd recommends that the SEM Committee have regard to the following:

- 1. That the management of the SEM should not create unnecessary market uncertainty. The main driver of market uncertainty is the SEM Committee's own actions.
- 2. That the management of the SEM should do nothing to frustrate the aims and requirements of the Renewable Directive (2009/28/EC). It is our view that if an arguable case can be made that the SEM Committee has not acted in full compliance with this Directive, legal action will certainly follow. We would encourage the SEM Committee to fully embrace the long-term thinking displayed in the Directive.
- 3. Insofar as the SEM Committee has an administrative function in relation to the operation of the network, we recommend that earlier connections should receive priority over later connections in terms of constraints and curtailment. This is in the interests of fairness.
- 4. Other than the points above, we support the submission of the IWEA

Yours sincerely,

Damien Courtney

Kish Offshore Wind Ltd

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