



Jamie Burke
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Friday, 13 May 2011

Re: Public Consultation on SEM-11-018

NOW Ireland the National Offshore Wind Energy Association of Ireland was established to promote the development of Ireland's substantial offshore wind resource and to ensure that our island leads the way in building a sustainable, green economy. The founding companies of NOW Ireland have the potential to generate over 2,600 MW of energy from existing resources. Our primary goal is to make renewable energy Ireland's primary energy source. The members of NOW Ireland consider that the development of our offshore wind resources would provide significant benefits to Ireland as follows:

The view of NOW Ireland is that irrespective of the detailed method used to calculate and allocate TUoS charges, the system must have regard to the following principles:

- It must be in compliance with all relevant EU regulations and in particular, EU Renewable Energy Directive 2009.28.EC.
- It must provide a stable investment environment, particularly for the renewables that will be needed for EU targets. NOW Ireland does not consider that dynamic or locational models of charging provide a stable investment environment.

- It must not allocate costs arbitrarily and should not, for example, allocate TUoS charges to generators when this will necessarily be then passed on to consumers as part of the electricity price

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Forde', with a stylized flourish at the end.

NOW IRELAND
Aidan Forde
Council Member