

SEM Committee,
c/o Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

25th May 2012

**SEMC consultation on the Treatment of Curtailment in Tie-Break situations
SEM-12-028**

By email to: jburke@cer.ie

Coillte welcomes the opportunity to respond to the SEM Committee consultation on the *Treatment of Curtailment in Tie-Break Situations*. Coillte has circa 400MW of joint venture and 100% owned projects at various stages of development in Gate 2 & 3. Coillte support the IWEA response to this consultation and the detailed research and justifications therein.

Coillte would like to reiterate its view that consultations on curtailment tie break situations are a temporary means of resolving the challenges associated with the requirement to have increased renewable energy on the system. The fundamental issues pertaining to the accommodation of renewables in accordance with the RES-E Directive obligations remain.

Coillte as an investor in wind energy projects for many years believe the existence and continuation of a stable policy framework to allow the industry on the island to move forward as being critical. Coillte believe linking curtailment to firm access is a significant shift in the industry for both operating wind farms and the development assumptions of windfarms currently in the planning phase.

Linking curtailment to firm access will result in a significant number of Coillte renewable energy projects which had been planned for the early part of the decade, not materialising until the latter end as the dependence on firmness would prevent appropriate projects from moving forward until the full impact of curtailment had abated through firmness. Coillte's view is that such an approach will result in the required level of new renewable energy not materialising, which will negatively impact the consumer and prevent Ireland and Northern Ireland from reaching their 2020 renewable targets.

We support the position taken by IWEA on the options put forward and also support the IWEA proposal to vary Option 3 in favour of the preferred ("Option 3b"). We believe this is a solution that represents an industry compromise position which importantly meets all of what we understand as the SEM Committee key objectives and strikes the right balance between addressing the curtailment issue and enabling the renewables industry advance in line with Government and EU policy and targets. We believe "Option 3b" as set out can be supported by the SEM Committee and the industry as well as importantly providing the least impact on the consumer.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Jude Byrne".

Jude Byrne
Director, Wind Energy