

25<sup>th</sup> May 2012

Your Ref: SEM-12-028

**Electronic submission to:**

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

By email to: [jburke@cer.ie](mailto:jburke@cer.ie)

**Re: Response to the "Treatment of Curtailment in Tie-Break situations ", SEM-12-028**

Dear SEM Committee members,

We, DW Consultancy Ltd (DWC), are wind farm project developers operating in both the Republic of Ireland and Northern Ireland. We have been active in the Irish wind industry for over ten years, and we have a large portfolio of operational, consented, and proposed windfarm projects which span both jurisdictions of Ireland. We fully welcome the opportunity to respond to the SEM Committee consultation on the *Treatment of Curtailment in Tie-Break situations*.

We are committed and active members of the two primary renewable organisations in Ireland, those being the Irish Wind Energy Association (IWEA), and the Northern Ireland Renewables Industry Group (NIRIG), and we would like to emphasise the detailed analysis both these organisations have conducted in proposing a solution to this consultation.

We fully support both the IWEA and NIRIG responses to this consultation, and would like to reiterate that curtailment is a critical matter to be addressed in order to provide a stable policy framework, which will allow the industry on the island to move forward. We believe linking curtailment to firm access will result in the required level of new renewable energy not materialising, which will negatively impact the consumer and prevent both the Republic of Ireland and Northern Ireland from reaching their committed 2020 renewable targets.

We support the position taken by both IWEA and NIRIG on the options put forward, and we also support the IWEA proposal to vary 'Option 3' to the now proposed 'Option 3b'.

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As outlined at the outset of this letter, we have a wide portfolio of projects (in both RoI and NI). Many of these projects have already been granted Firm Access and are yet to be constructed. We also have two operational windfarms with firm access. With this in mind these projects would benefit from the 'Option 1' as proposed by the SEMC in their consultation document. We have however viewed this consultation in the wider context of the overall benefit to the wind industry on the island of Ireland, and have thus concluded that the 'Option 3b', as proposed by both IWEA and NIRIG, offers the industry as a whole the best possible compromise on this issue.

We also believe this is solution importantly meets all of what we understand to be 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.

In conclusion we would like to thank the SEM Committee for the opportunity to engage on this issue and to highlight the particular importance of this consultation given the significant implications it has for the viability of the wind sector across the island of Ireland.

Should you have any queries, or should you wish to discuss this matter further, then please do not hesitate in contacting us.

Yours Sincerely,

A handwritten signature in black ink that reads "Barry O'Kane". The signature is fluid and cursive, written over a horizontal line.

**Barry O'Kane, B.Eng, C.Eng, MIEI,  
Chartered Engineer  
For: DW Consultancy Ltd.**

cc Ms. Doreen Walker

DW Consultancy Ltd.