

25th May 2012

To whom it may concern,

We welcome the opportunity to respond to this consultation on the treatment of Treatment of Curtailment in Tie-Break situations (SEM-12-028).

Gael Force Wind Energy operate wind farm projects ranging from pre-Gate to Gate 1 and are involved in upcoming Gate 3 wind farm projects. The wind farm projects we manage are based in the South-west region (a potential constraints group), and we have actively monitored dispatch in our projects over the last 3 years.

We are writing to SEM Committee to support the principals of a grandfathering approach with respect to its positive impacts identified in the SEM-12-028 Consultation paper. A grandfathering approach will act as an effective entry signal in addition to highlighting the status of the grid in accepting renewables.

In our view, a pro-rata approach would retroactively affect the financial viability of existing wind farm projects as well as giving a negative investment signal for future projects.

Given that both curtailment/constraint are grid related and that the System Operators (SO's) will actively manage and control curtailment/constraint, it would be pertinent to put in place an incentive for the SO's to carry out all dispatch of renewables in the most efficient manner possible. For example, Transmission Use of System (TUoS) charges for a firm renewable generator are fixed regardless of the amount of dispatch carried out in a TUoS billing period. If a mechanism was introduced to reduce TUoS charges proportional to the amount of curtailment/constraint, it would both:

- incentivise efficient curtailment/constraint by the SO's
- offset any potential impact on the consumer and Dispatch Balancing Costs

Yours sincerely,

A handwritten signature in black ink that reads "Michael Sheehy".

Michael Sheehy
Managing Director

Gael Force Wind Energy Ltd.
Tom Crean Centre
Kerry Technology Park
Tralee, Kerry
Ireland