

Killala Community Windfarm Ltd.,
Lisglennon,
Killala,
Co. Mayo

SEM Committee,
c/o CER
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

25th May 2012

By email to jburke@cer.ie

Response to the “Treatment of curtailment in tie break situations” SEM-12-028

Killala Community Windfarm Ltd is developing a windfarm near Killala in North Mayo. This development is being led by a group of eight families in the area. This project will offer local people an opportunity to invest in the project, thereby maximising the return to the locality. Planning permission was granted by An Bord Pleanála in October 2010. A grid application was made in 2005, and the project is in Gate 3. Killala Community Windfarm Ltd (KCWF) would like to make the following submission on the current consultation document.

KCWF is strongly opposed to grandfathering based on firm access. KCWF welcomes the SEM committee consultation and the opportunity to review the allocation of curtailment which is a critical matter to be addressed to provide a stable policy framework to allow the industry move forward. KCWF was disappointed by the lack of consultation preceding such a momentous shift in policy. It is our opinion that the grandfathering of curtailment was fundamentally flawed on the basis that it was biased in favour of existing generators, was anti – competitive, and would prevent Ireland reaching its 2020 targets for renewable energy and indeed would have a hugely deleterious effect on the future viability of the entire wind industry. It is also a retrospective change in how the wind industry expected curtailment to be allocated. In-fact, in numerous SEMC consultation documents curtailment was proposed to be allocated on a pro-rata basis without any other options being discussed. In our own case the introduction of grandfathering based on firmness would delay the development of our proposed windfarm until approximately 2025, twenty years after we applied for a grid connection.

The proposal as it stood would have a particularly damaging effect on the development of community based projects like ourselves, as such projects tend to be site specific and community based developers do not have a suite of proposed and developed sites over which they can spread the curtailment risk. Various policy documents over the years have advocated support for community based wind projects to increase the overall acceptance of the wind industry within local communities and at the same time maximizing the local economic return. It is high time cognisance of community wind farm developments was taken in the allocation of grid connections.

KCWF supports the position of IWEA on the current consultation in that

- There is a need to break the link between firmness (FAQ) and curtailment.
- It needs to be recognised that there is an unavoidable trade-off between perfectly protecting operational projects and allowing new build.
- Any policy decision should at very least allow 2020 targets to be met.
- Addressing the risk of overbuild making it difficult to finance any build is not appropriate
- It should be recognised that with trajectory towards the EU Target Model, it may be fruitless to set policy past 2020.
- It is important to facilitate a scheme to adapt to changing policy (e.g. introduction of 2030 targets) and changing systems (e.g. curtailment mitigation measures or new technology).

In principle, KCWF broadly supports option 2, involving the pro rata allocation of grid access. However we urge that the special position of community based projects be recognized in such an allocation of grid. In Denmark for example it is our understanding that community based projects receive favourable treatment in the allocation of grid.

We believe such a broad approach would allow Ireland meet its 2020 obligations at the least cost to the consumer. The number of community based projects is minimal in the context of the wider industry but we believe that the emergence of community based projects is of major strategic importance in increasing the acceptability of the wind industry and in maximising the economic returns to the environs of the windfarm. Most windfarms are located in economically disadvantaged remote areas with limited resources and such a favouring of community windfarms would have a significant economic benefit in such areas.

Option 3 as it is set may address short term concerns, however KCWF feels it may not be sufficient to address the requirements of financiers and therefore may be unworkable. However, we see merit in the IWEA proposal “option 3 b” which is effectively pro rata curtailment up to achievement of the 2020 targets. Again we would ask that the special position of community based windfarms are considered if this option were to be adopted.

We do not consider the other options 1, 3 and 4 to be workable.

We are grateful to receive the opportunity to make a submission on this important issue.

Yours Sincerely,

Damien Barrett
Director Killala Community Windfarm Ltd¹

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