

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

25th May 2012

By email to: jburke@cer.ie

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

Dear SEM Committee members,

Nordex Energy Ireland welcomes the opportunity to respond to the CER's consultation on the *Treatment of Curtailment in Tie-break Situations*. Nordex is a leading wind turbine manufacturer with operations in 18 countries worldwide. Nordex Energy Ireland was established in January 2010, and we currently have over 152MW of wind installed in the Republic of Ireland and over 120MW in Northern Ireland.

Nordex understands the importance of this issue for the future of the Wind Energy Industry and Irelands 2020 renewable targets. Nordex accept that curtailment and is not a black or white issue and it is difficult to propose a perfect solution for both current and future windfarms. Importantly we feel it is critical that sufficient support is provided to generators who have wind farms that are ready to finance and construct because to remove the ability to finance will certainly have an impact on the expansion of wind onto the grid in the near and medium. Nordex also understands the concerns from existing generators that retrospective curtailment would be unfair.

In the longer-term interests of the wind industry and Nordex's participation in developing this business within Ireland, we support the positions outlined by the Irish Wind Energy Association (IWEA) in their response to this consultation. In our view the IWEA position has been well thought out and strikes a balance between short-term and long-term wind energy projects. Crucially, it is our belief that IWEA's recommendation will help to restore confidence in the Irish market and help Ireland to achieve its 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 ("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.

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.

Yours sincerely

For and behalf of Nordex Energy Ireland

Gary Crowley

*sent by email.