NIRIG
NORTHERN IRELAND
RENEWABLES INDUSTRY GROUP
The voice of IWEA & RenewableUK in Northern Ireland

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

19th November 2012

By email to: jburke@cer.ie

Re: Response to the **"Treatment of Curtailment in Tie-Break situations – Proposed Decision Paper", SEM-12-090**

Dear SEM Committee members,

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association (IWEA) and RenewableUK. NIRIG represents the views of the large scale and small scale renewable energy industry in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in renewable energy.

NIRIG welcomes the opportunity to respond to the SEM Committee Proposed Decision Paper on the Treatment of Curtailment in Tie-Break Situations (SEM-12-090) and the opportunity to review the allocation of curtailment. We support the IWEA response to this consultation and welcome the proposed decision that curtailment be allocated on a pro rata basis; however, we strongly oppose the proposal to reduce and remove the levels of compensation to generators for curtailment.

Our concerns are primarily regarding the discriminatory nature of the proposal and the retrospective application of the changes, as well as determining one aspect of the future market design without considering the market in its entirety. Such a retrospective change would be very damaging to investor confidence and undermine any confidence in a stable policy framework.

We would also like to note that the proposed decision is in contradiction to the recent Material Harm decision which clearly set out a number of triggers to monitor material harm

to the consumer. The proposed decision paper outlines a quantified impact that does not justify harm to the consumer.

We support the position taken by IWEA on the proposed decision put forward and also continue to support the IWEA proposal to vary Option 3 ("Option 3b") which was previously put forward. 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

**sent by email, requires no signature*

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Meabh Cormacain

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