

Eirgrid
The Oval
160 Shelbourne Road,
Ballsbridge,
Dublin 4

SONI LTD.
12 Manse Road,
Belfast,
Co. Antrim
BT6 9RT

4th December 2015

Brookfield Renewable Energy Group
5th Floor,
City Quarter, Lapps Quay,
Cork

RE: DS3 Volumes Calculation Methodology and Portfolio Scenarios

Dear Sir/Madam,

Brookfield Renewable welcome the opportunity to engage and provide commentary on the consultation paper for 'Volume Calculation Methodology and Portfolio Scenarios' for DS3 System Services Implementation. The delivery of DS3 is essential for facilitating greater amounts of non-synchronous generation on the Irish grid. The increased SNSP limit will be crucial for minimising the curtailment as we progress towards 2020 given the significant wind development pipeline. Minimising curtailment of wind must remain a priority in order to meet 2020 targets and ensure consumers get maximum benefit from low marginal cost generation.

Brookfield Renewable Ireland Limited (Brookfield Renewable) is a wholly-owned subsidiary of Brookfield Renewable Energy Partners, one of the largest publicly traded, pure-play renewable power platforms in the world. Brookfield Renewable completed the acquisition of the wind generation assets of Bord Gáis Éireann in June 2014 which included 320 MW of wind capacity across 17 wind projects in 8 counties in Ireland and Northern Ireland. Since then, Brookfield Renewable has brought 144 MW of wind generation to commercial operation and now have an operating portfolio of 464 MW across the island. Additionally, Brookfield Renewable plans to expand its portfolio and has an extensive development pipeline of approximately 200 MW of wind across Ireland and Northern Ireland, including a 100MW tidal generation project off the coast of Northern Ireland and nearly 50MW of onshore wind projects approaching construction.

Brookfield broadly agree with both the methodology for determining the volume requirement of each of the system services, the interpolation between detailed modelling years and the portfolios chosen to represent the system put forward in this consultation paper.

However, during stakeholder engagement there was some uncertainty regarding the threshold for the acceptable level of curtailment. Following a question from IWEA, the TSO stated that any portfolio scenario that returned a curtailment of less than 5% would be deemed acceptable. Brookfield do not agree that it is appropriate to set a threshold below which any amount of curtailment is satisfactory nor do we agree that if such a figure were required for resolving a model that 5% would be an appropriate target.

By using an acceptable threshold of 5% to determine the volumes of each system service required, Brookfield feel that the TSO is limiting the potential of future generation portfolios to achieve curtailment levels below this. This is contrary to the objective of the RES Directive which states that

“appropriate grid and market-related operational measures are taken in order to minimise the curtailment of electricity produced from renewable energy sources” and that

“if curtailment of renewable energy sources is required to ensure security of supply, systems operators must propose corrective measures to prevent inappropriate curtailments”.

Brookfield believe that there should be an incentive for the TSO to minimise curtailment and that 0% should be the hypothetical target in order that:

- Ireland continues to meet its renewable targets,
- Consumers gain the maximum benefit from low marginal cost generation such as wind,
- Curtailment targets in Ireland continue to comply with European RES Directive.

Please don't hesitate to get in touch if you would like to discuss any of the points addressed in the letter any further.

Kind Regards,
Daire Reilly

Regulatory & Power Markets Analyst
T 021 422 3673 M 087 991 7887
daire.reilly@brookfieldrenewable.com