

From: Owen Martin (omartin100@gmail.com)
Sent: Tue, 24 Nov 2015 13:10:37
To: DS3@eirgrid.com
Subject: DS3 Programme Consultation

Dear Sir / Madam,

Response by Owen Martin, electricity consumer, on DS3 Programme System Services Plan (deadline 25th November 2015).

The above programme is proceeding illegally in contravention of Aarhus Convention and the SEA Directive. UNECE CC MOP ruled that NREAP did not comply with Article 7 of the Aarhus Convention (ACCC/C/2010/54). Therefore consultations on DS3 Programme are superfluous since the overall plan is deemed illegal.

Notwithstanding this fact, I strongly object to paying for system services that are required to facilitate large amounts of wind energy. This amounts to yet again more cross-subsidisation for a technology that is already over subsidized. The wind industry should not be asked, but instead told, that they are to pick up the tab 100% for system services required to keep the lights on during high penetrations of wind. Irish electricity prices are already the third highest in EU, it is not acceptable to add to that.

Article 3 of the Lisbon Treaty states that I have a right to a highly competitive social market economy. The DS3 Programme is re-inforcing the culture of subsidy entitlement in electricity generation going against the principles of this Treaty which I have endorsed and to which Ireland has signed up to.

Eirgrid's main role is to keep the lights on, not to facilitate non dispatchable generation to the detriment and expense of consumers. If we, the consumer, are to subsidize system services for the benefit of the wind industry, then in the event of a blackout due to increasing SNSP levels, I demand to be compensated for loss of electricity by the wind industry. Please outline if there is a mechanism in the DS3 Programme for such compensation and if not, why not.

Regards

Owen Martin
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Cavan