

**From:** Nigel de Haas ([nigel.dehaas@outlook.com](mailto:nigel.dehaas@outlook.com))  
**Sent:** Tue, 24 Nov 2015 15:03:54  
**To:** [DS3@eirgrid.com](mailto:DS3@eirgrid.com)  
**Subject:** Consultation: DS3 Programme System Services Plan

Dear Sir / Madam,

**Response by:** Nigel de Haas  
**Role:** Electricity consumer  
**Subject:** DS3 Programme System Services Plan

### **Preamble**

- The DS3 programme is in contravention of Aarhus Convention and the SEA Directive.
- UNECE Compliance Committee Meeting of Parties ruled that NREAP did not comply with Article 7 of the Aarhus Convention (ACCC/C/2010/54).
- The Irish Government accepted the findings of the UNECE CC MOP that the NREAP is non-compliant
- This consultation is on a plan which has been deemed illegal by UNECE.

### **Objections**

- 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 full tab 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 unacceptable to add to that.

### **Context**

- Article 3 of the Lisbon Treaty states that I have a right to a highly competitive social market economy. The DS3 Programme reinforces the culture of subsidy entitlement in electricity generation.
- The DS3 programme runs counter to the principles of the Lisbon Treaty.
- Ireland has ratified the Lisbon Treaty following a referendum of its citizens.

### **Conclusion**

- The primary role of Eirgrid is to keep the lights on, not to facilitate non-dispatchable generation to the detriment and expense of consumers.

- Since Eirgrid proposes that the electricity consumer should subsidize system services for the benefit of the wind industry, it has an obligation to compensate consumers for loss arising from SNSP level induced power outages.
- Kindly ensure that there is a mechanism in the DS3 Programme for such compensation.

Regards

Nigel de Haas  
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