

Mr Matthew Grant  
European Electricity Transmission  
9 Millbank, London, UK  
SW1P 3GE.  
ITPRMailbox@ofgem.gov.uk

# Regulation of transmission connecting non-GB generation to the GB electricity transmission system

We the Wolfhill/Luggacurren Wind Awareness Group representing 153 households who reside in the County of Laois in the Republic of Ireland make this submission in our capacity as a stakeholders in any project that has the capacity to directly affect our rights , our environment, our health , or our asset values. We are ordinary members of the public, with no vested interest in the proposed development of energy trading between the UK and the Republic of Ireland.

1.The only option open to this export policy at the moment, given the time constraints involved is the POINT to Point option - . The companies involved in Ireland have no connection agreements with the Irish grid, only agreements to link to the UK national grid. Problems associated with this are manifold, not least being the de-coupling necessity; i.e. generators cannot also control the transmission system. OFGEM talks of getting around this by allowing through legislation, at national level and through the EU energy commission, to grant exemptions on specific projects. The rules for exemptions are obviously complex, made more so by the fact that different criteria exists on all interconnectors, depending on whether it is between member states, or 1 member state and a non-member state of the EU. The UK has flagged that it is holding a referendum in the near future as to whether it will remain within the EU, and pending the outcome of that referendum, I would suggest that NO agreements or discussions can or should take place between Ireland and the UK around export/import of energy, because as it stands, we or you do not know the criteria that can be used in approach to such legislation.

2. In the event of these projects progressing beyond this stage, we as Irish citizens, who will have to bear the infrastructure imposed on our environment and all the attendant risks, demand that we, at the very least, be afforded the same protection and consultation rights as are available to UK citizens under UK law. We also demand that our rights under the Aarhus Convention be strictly observed: the right to participation at a point before any decisions are made.

3. We, as citizens of the Republic of Ireland are protected by our constitution, article 10 of which states that all means of power production, including the air above us, belongs to the Irish people, and can only be used for the benefit of all the people of Ireland. It is hard to marry this to the proposal as laid out by this proposal. Nowhere does it say that the UK is part of this package, nor does it state that the benefits should go to a small

group of landowners and international corporations. We shall be seeking clarification of our constitutional rights through the Irish courts and EU courts, and would suggest that a referendum would be necessary to change the Irish constitution to allow what is proposed to take place.

4. Because the infrastructure will be wholly funded by the UK citizens, in the form of subsidies on their power bills. We would imagine that the UK has a duty of care to protect its citizen's assets. These assets are in a foreign sovereign nation, and so would be quite difficult to police and protect. What lengths would the UK be prepared to go to ensure that its infrastructure is protected? The 'Suez Canal' crisis is a stark reminder of how these things tend to work out. Ireland claims a policy of Neutrality internationally, The UK in the recent past has had many amber/red security alerts, and we wonder how UK strategic infrastructure could be protected in a foreign country, who has responsibility, and indeed who will bear the costs of such security?.

Relations between the UK and Ireland have improved immensely over the last decade or more, but any good done, could be very easily undone by any attempt by the UK to export its commitment to a flawed renewable policy to a neighbouring country with an equally flawed renewable policy. There is huge opposition to these proposals at grass root levels in this country. Trust in our government's handling of this policy has evaporated. We would suggest that the UK does the right thing, and stop this madness before it results in large scale bad feeling and unrest, both in Ireland and the UK.

Yours sincerely,

Deirdre MacQuaile

Secretary Wolfhill/Luggacurren Wind Awareness Group