



1<sup>st</sup> September, 2011

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Renewables  
Commission for Energy  
Regulation  
The Exchange  
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Frankie Dodds  
Social & Environmental Branch  
Northern Ireland Authority for Utility  
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Queens House  
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Dear Robert, Frankie,

***Response to SEM Fuel-Mix Disclosure Calculation Methodology Consultation***

Airtricity welcomes the intention to adopt, within the proposed fuel-mix calculation methodology for SEM, the clarifications made regarding GOs by the European Renewables Directive. Specifically the clarifications regarding the sole purpose of GOs for fuel-mix disclosure and that GOs do not need to trace the same path as the electricity from which they originate. In previous discussions with the Regulators, we had always maintained that introduction of GOs would not be for explicit financial considerations; rather it would establish a means for verifiable electricity-supply attribution used in market differentiation.

On the ability to delink GOs from physical electricity flows, we have also previously posited and agree with the principle of differentiable and detachable attributes from actual electron-flow of electricity. However we are of the view that **detachment of attributes should be on the basis of elective action taken by owners/holders of certified attributes rather than such detachment occurring by default**. Regarding the proposal to adopt the European residual fuel-mix instead of the Great British residual fuel-mix as currently obtains, from the principle just espoused, we argue this to be an incorrect application of the detachability of GOs from actual electricity flows. Where electricity attributes have not been explicitly assigned, either by owners/holders or by rules such as the one that relates to support schemes, we hold the view that the default treatment of such attributes is that they follow the electricity from which they derive.

Finally, Airtricity seeks clarification on the "green star" rating proposal of the Utility Regulator. It is in our interest to ensure full clarity regarding disclosure of fuel-mix for electricity supplied to customers. However our cursory understanding of the UR's proposal indicates that simplification of presentation would be obtained at the expense clarity.

Kind Regards,

{sent by e-mail}

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Emeka Chukwureh  
Regulation