Support Scheme for Small-Scale Generation (SSG) - Consultation

Submission by Chambers Ireland

October 2022

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged since 2019 to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs). In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing

decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), advancements in gender equality (SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).[1]

We use the SDG Goals to interpret and prioritise our policy proposals. Sustainability underpins our work and renewable energy is particularly important to our Network, as it is a critical element to our national climate action response. Accordingly, Chambers Ireland is vocal on how best to maximise Ireland's potential as a country that can become energy self-sufficient and an exporter of renewable energy.[2] As the voice of the Irish business community, we are uniquely well-placed to contribute to the national conversation on energy policy, particularly on behalf of SMEs throughout Ireland.

In the past, Chambers Ireland contributed to consultations on similar support schemes such as the Microgeneration Support Scheme (MSS).[3] In this, we underlined our steadfast support for renewable energy and a national policy that adequately sets out proposals to help achieve our climate target of a 51% cut in economy-wide emissions and for the share of electricity demand generated from renewable sources to be up to 80% by 2030.[4] Once more, we stress that such as feat is only achievable if we can scale up our capacity to generate renewable electricity. It is for this reason that Chambers Ireland strongly supports the escalation of renewable energy generation in the State.

Government has an important opportunity to empower and engage citizens, including the business community, in the generation of their own renewable electricity. Chambers Ireland is very supportive of the proposals to introduce an SSG scheme in Ireland in 2023 and wishes to underline the need to accelerate its development and widescale establishment as a way of meeting our climate targets. This would a)

---

[1] The Chambers Ireland SDGs. Available at: https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/
[2] Chambers Ireland white paper on maximising the benefit of developing the national wind energy industry and the national grid. Available at: https://www.chambers.ie/wp-content/uploads/2021/01/Chambers-Ireland-white-paper-on-maximising-the-benefit-of-developing-the-national-wind-energy-industry-and-the-national-grid.pdf
3 Chambers Ireland submission on the Microgeneration Support Scheme: https://www.chambers.ie/wp-content/uploads/2021/02/Chambers-Ireland-submission-to-the-Department-of-the-Environment-Climate-and-Communications-on-a-Microgeneration-Support-Scheme-in-Ireland.pdf
4 Government announcement on sectoral emissions ceilings: https://www.gov.ie/en/press-release/dab6d-government-announces-sectoral-emissions-ceilings-setting-ireland-on-a-pathway-to-turn-the-tide-on-climate-change/#:~:text=%E2%80%9CToday%20the%20government%20has%20agreed,under%20Climate%20Action%20Plan%202021.

contribute to our energy security which has been highlighted most recently by difficulties arising from the war in Ukraine, and b) help to reduce energy costs for SMEs, farmers and communities. Sourcing our fuels from countries that are politically unstable imports political risks into our economy. Indeed, we need to ensure that Ireland has a resilient energy supply which can sustain economic, social, political, and environmental shocks. Bearing this in mind, we have outlined several points that we believe the Department should take into consideration in designing and initiating the SSG. In short, it should be in line with the approach set out by the Regulator when it comes to the overall strategy and connectivity. Secondly, it should encompass an SME and entrepreneur-friendly approach.

Chambers Ireland's Perspective on the Support Scheme for Small-Scale Generation (SSG)

Question 1: Do you agree with the proposed technology neutral approach and indicative list of eligible technologies? Are there other technologies that should be considered eligible for the scheme, or any proposed technologies that you think should be excluded from the scheme? Please provide evidence to support your answer.

Chambers Ireland agrees with the proposed technology neutral approach and the indicative list of eligible technologies. Nonetheless, it should be noted that technology is ever-evolving and that therefore the list should be non-exhaustive to include potential future technologies. Accordingly, reviews should take place every three years, so that any appropriate changes to the list can be accommodated.

Question 2(a): Do you agree with this approach to determining the policy and subsidy lifetime, or should the policy and subsidy lifetime for the scheme be fixed from the commencement of the scheme?

It is our view that the policy and subsidy lifetime should not be fixed from the commencement of the scheme. We therefore agree with the proposal that the policy and subsidy lifetime need to be adaptable to futureproof the scheme. This is particularly relevant considering the rising cost of living. Future regular reviews should therefore take this into account, alongside the relevant supply chain difficulties and scheme uptake. Regarding costs any changes in support arrangements should to be signalled to consumers far in advance. It is also particularly important to factor in the high uncertainty surrounding the current market and the possible fluctuations that it will cause in the future trajectory of costs. Any costs associated with the SSG should not increase the burden on vulnerable consumers. Therefore, it will be vital to perform regular reviews to ensure that the rates reflect the movement in costs.

Question 2(b): Should the SSG be operated through a number of rounds or as one continuous scheme? Please provide evidence to support your answer

The SSG should be operated through a number of rounds, as opposed to one continuous scheme.

Question 3 (a): SSG support will be available to all eligible non-domestic renewables selfconsumers with new installations between 50kW-999kW and with an appropriate export grid connection from the DSO only. For renewables self-consumers in the 1-6MW range, supports will only be available to those who can demonstrate 100% SME or REC status. Do you agree with this approach? If not, what alternative do you suggest? Please provide evidence to support your answer

Regarding the first point, it is obvious the SSG scheme needs to apply non-domestic renewables self-consumers between 50kW-999kW, so as not to infringe on the Micro-generation Support Scheme which caters for installations below 50kW capacity. However, regarding the export grid connection, it is important that the requirement to prove an appropriate grid connection from the DSO does not exclude applicants who possess battery

storage capacity. Battery storage is useful as it means that non-domestic renewables self-consumers may use the stored energy when they need it.

Regarding the second point, to benefit from the exemption from state aid requirements,[5] it is a requirement for self-consumers in the 1-6MW range to demonstrate 100% SME or REC status. The scheme therefore has to be selective, as this is a requirement under EU law.

Question 3(b): Would it be appropriate for exported volumes of renewable electricity eligible for SSG support to be capped at a certain percentage of total generation capacity for this cohort, to encourage self-consumption? Please provide evidence to support your answer.

No. There is no disadvantage to generating electricity for export – this is what should be happening if we are to encourage investment in renewable energy infrastructure. Indeed, limits on installation sizes and a payment cap on exported volume could act as disincentives to uptake of the scheme. Were caps of some variation to be introduced, then a sliding scale of remuneration could be considered for export volumes above the cap, and a flexible approach could be considered for non-domestic buildings during periods of low occupancy. However, Chambers Ireland feels that it is fundamentally not feasible for large companies, for example, to apply for the scheme and have a skeleton business in place. Accordingly, the likelihood of the scheme being open to abuse in this regard is extremely low and capping supports at a percentage of generation capacity is not necessary to disincentivise uptake.

Question 3 (c): Supports for rooftop solar PV installations will need to take account of current and future renewables requirements in relevant building regulations. How can this best be achieved? Please provide evidence to support your answer

It is arguably correct to say that many of our buildings are simply too old to meet the minimum standards or lack the resources required to install rooftop PV solar panels. Relatedly, an amendment to the Energy Performance of Buildings Directive will require Member States to ensure that all new buildings are designed to optimise their solar energy generation potential based on the solar irradiance of the site. This is to enable later cost-effective installation of solar technologies but may by extension further limit the number of eligible rooftops for solar PV installations. Relevant data should be made available to account for this in the modelling by the SEAI, as it will decrease the number of eligible rooftops for solar PV installations under the SSG.

Question 4 (a): Do you agree that all small-scale generation projects should be eligible for SSG support for installations between 50kW-999kW? If not, what alternative approach would you suggest? Please provide evidence to support your answer

Yes. All small-scale generation projects should be eligible for supports within the specified range (50kW-999kW). This is for the same reason given in 3(b); that the likelihood of the scheme being open to abuse by applicants is low. We do not envisage skeleton businesses being set up to take advantage of the SSG. Furthermore it is logical to not apply narrow or unduly selective criteria for applying to the scheme. This is not least for the purposes of improving our energy security but rather for the attainment of our agreed climate goal of having 80% of our electricity generated using renewable energy by 2030.

---

5 State Aid Guidance. Available here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.2022.080.01.0001.01.ENG&toc=OJ%3AC%3A2022%3A080%3ATOC

Question 4 (b): Do you agree that projects in this cohort must be able to demonstrate planning approval/exemption and grid connection offer in order to be eligible for SSG support? If not, what alternative approach would you suggest? Please provide evidence to support your answer

Yes, the requirement to demonstrate planning approval or exemption, along with a grid connection is necessary if the support in question is a grant aid. It is a fair concession to allow projects to be eligible and to pay the first stage payment in advance. This allows for administrative activity to progress but, ultimately, planning consent should be confirmed before connection can take place.
However, if a tariff is involved, then the planning requirement should be waived, as it is irrelevant. Additionally it should be noted that the relevant legislation (the Planning and Development Regulations 2001) pertaining to planning and installing the infrastructure is being examined to bring Ireland into line with the EU's Solar Rooftops Initiative by permitting procedures for installing solar rooftops being shorter and simpler. The draft regulations have proposed removing the rooftop square metre-based limits that currently apply in the Principal Regulations, to allow more extensive coverage, subject to certain conditions as well as restrictions in certain areas. If or when these planning requirements for infrastructure is removed, then both requirements may be made redundant.

Question 5 (a): Do you agree that 100% SME and Community-owned small-scale generation projects between 1MW-6MW should be eligible for SSG support? If not, what alternative do you suggest? Please provide evidence to support your answer

Yes. Community-owned SSG projects should be eligible for SSG support and promoted in our high-density urban areas. Available examples from the UK - specifically areas in London – indicate that community-owned projects have been proven to work well, especially in economically-deprived areas and areas where social housing is present. Not only do participants receive a reduction in bills; an additional incentive exists for the communities to reinvest the income generated by the SSG projects into their own community. This shows the wider advantage of the scheme for communities; reinvested money could go into debt management, fuel poverty advice and additional grants for young people living where the projects are located.

It is important to highlight that while Chambers Ireland welcomes the development of the SSG, it is critical that any regulation in this area is flexible and not burdensome on businesses, especially SMEs. Rigid regulation which has the potential to undermine business participation should be avoided. It is also important to highlight that any new regulations that may be introduced as part of a future strategy should not be applied in a way that may harm business competitiveness – especially for businesses that are adapting, or have adapted, more circular approaches to their operations. The SSG should make it easy for entrepreneurs and SMEs to participate. It should also be designed to be SME-friendly and by doing this we can ensure maximum participation with reduced red tape and administrative burdens. Similarly, allowing community projects to participate in the scheme will alleviate the administrative complexity of applying to the scheme.

Question 5 (b): Do you agree that the terms and conditions of the scheme should define further eligibility criteria for SME projects in this cohort, to ensure that only appropriate beneficiaries receive SSG support? How can this best be achieved? Please provide evidence to support your answer.

No. Further eligibility criteria should not be defined to avoid the scheme being utilised improperly. The purpose of the SSG support is to offset all or at least part of a final customer's electricity demand. Even where subsidiaries are concerned, solar power is an add-on, rather than the main business activity of the entity. Bearing this in mind, it is unlikely that subsidiaries of larger businesses would be set up solely for the purpose of receiving SSG support. Were further terms and conditions to be defined, then caps could be applied to SMEs whereby they should only be eligible to participate in one scheme. This would bypass the risk of excluding businesses from the SSG scheme. It would also be in addition to providing support to established entities, as laid out by the consultation paper.

Question (6a): Do you agree that a two-way floating Feed-in Premium is the most appropriate support mechanism for small-scale generators between 50kW-6MW? If not, what alternative would you suggest? Please provide evidence to support your answer.

Chambers Ireland agrees that the two-way floating Feed-in Premium (FIP) is the most appropriate, cost-effective support mechanism for small-scale renewables. Feed-in Premiums are more effective, specifically because they are flexible when compared to a feed-in tariff. We support the implementation of an FIP policy that is similar to that which is in place for the Micro-Generation Support Scheme (MSS). An FIP policy should therefore be in place which is fixed by year and is in addition to the Clean Export Guarantee (which all archetypes listed by the SEAI in its report are expected to receive).

Question (6b): Do you agree that a two-way floating FiP is appropriate in the case of renewables self-consumers? At what level of installed capacity should this come into effect? Are there any other clawback mechanisms that you think would be more appropriate? Please provide evidence to support your answer.

Chambers Ireland does not hold a position on this topic.

Question 7 (a): Do you agree that SSG support for Renewables Self-Consumers should be in the form of a floating FiP, paid by suppliers, with shortfall between the SSG FIP and wholesale prices to be covered by the PSO? If not, what alternative arrangement would you suggest? Please provide evidence to support your answer

Chambers Ireland does not hold a position on this topic.

Question 7 (b): Do you agree that for all other projects, SSG support will be in the form of a floating FiP on top of the market revenues they receive by way of a PPA with an electricity supplier? If not, what alternative arrangement would you suggest? Please provide evidence to support your answer.

Chambers Ireland does not hold a position on this topic.

Question 8(a): What are respondents views on the appropriateness or feasibility of different tariff rates for different classes of applicants?

We agree with the tariff rates for different classes of applicants. Considering the amount of space required for generation, there is reason to believe that most applicants will likely end up in the below 50kW-100kW cohort. As stated elsewhere in the submission, the tariffs laid

down in the MSS scheme are not sufficiently high to increase uptake, and we hope that the SSG will cater for those. Similarly, applicants falling in the 1MW-6MW cohort should be adequately facilitated by the FiP rate in place. This is true where applicants cannot meet the timelines and other requirements of the RESS scheme, especially where community groups are concerned.

Question 8 (b): Are there any specific measures that can be taken to minimise the overall costs of the SSG to consumers?

It is our view that protection for vulnerable consumers should be built into the design of the scheme. Connection costs will be particularly contentious, as depending on the connection in question, the cost may be relatively high or in some cases only feasible for wealthy applicants. This may be a significant problem for applicants who live in rural areas, where connectivity to the grid is notably poor. Hence the impact of high connection costs - and other accumulated costs - has the potential to close off the SSG to many applicants and limit the effectiveness of the scheme. Consequently, should the costs of the tariff be passed on to the consumer it is possible that all consumers are supporting the capital investments of those consumers with the available money to cover the initial investment.

Question 9: Respondents are invited to offer suggestions as to how projects owned by Renewable Energy Communities may be supported under the SSG. Please provide evidence to support your suggestion.

Chambers Ireland is very supportive of the initiative. We nonetheless hold concerns that Renewable Energy Communities (RECs) may experience challenges in obtaining requisite funding. The rationale for this is that SMEs in particular experience difficulties in accessing funding, and by extension we anticipate these difficulties being mirrored in this context. Microfinancing can close this gap by providing the small loans required that RECs need to get off the ground and thrive. It is therefore critical that microfinancing is available for the RECs and that joint-ownership is a requirement. As an example, to alleviate any financial hurdles, Scottish communities have chosen to co-own wind farms alongside private developers, by acquiring either a stake in a project or a number of individual turbines. Similarly, some communities have chosen to buy a share of the revenues from projects, without owning an actual shareholding. This means they can avoid many of the responsibilities and risks that come with co-owing a renewable energy project.

One way of ensuring sustainable joint-ownership and a community-led approach to the project is to implement evaluation criteria on the participation of local citizens and municipalities. Numerous examples such as Amel & Bullingen[6] in Belgium provide a blueprint for implementing such a requirement to ensure effective financing; here two companies won the tendering process by offering up to 60% of the project to the municipalities, while 40% of the project stayed in the hands of local citizens through cooperatives.

We also would like to note that in addition to the lack of financial resources being a barrier for Renewable Energy Communities, regulatory regimes (specifically across Europe) have traditionally favoured larger, more economically viable projects than small scale generation projects. Consequently this has excluded small-size initiatives, who have been unable to compete, particularly in tendering processes. Additionally, community renewable energy projects are usually based on a bottom-up approach, which in the majority of successful cases counts on the support and/or direct participation of the local authorities. To achieve local

6 Amel & Bullingen. Available here: https://www.rescoop-mecise.eu/renewable-energy-projects/amel-bullingen

acceptance, the involvement of local authorities will be as important as highlighting social or financial benefits arising from the SSG for the local community.

Question 10 (a): DECC welcomes the views of respondents as to any financial, regulatory, technical or other barriers to the uptake of small-scale renewable electricity generation in Ireland. Are there specific barriers impacting Community projects, or projects in agricultural, rural or island settings? How can these barriers be overcome? Please provide evidence to support your answer.

State aid guidance as laid out by the European Union allows for exemptions to competitive bidding requirements for installations in all sectors up to 1MW. This also applies to SMEs and Renewable Energy Communities, up to 6MW. Renewable energy communities and small and micro enterprises may also develop wind projects up to 18 MW without competitive bidding. We, therefore, do not envisage any severe drawbacks or barriers arising from approving state aid for projects. Regarding regulatory barriers, we stress the importance that any future regulations affecting the scheme are not unduly narrow in their criteria and restrict the SSG to a select number of applicants. Also, rooftop and ground-mounted systems at the SSG scale at present require planning permissions. Planning applications add costs, time and risk to the deployment of local renewables, thereby constituting a significant barrier. Elsewhere in our submission, we have noted the potential for the relevant planning legislation to be amended to mitigate this problem. This is something which we hope will happen, particularly now that there is an overriding public interest in approving SSG projects; which has been amplified by the climate crisis and presently vulnerable energy security.

Regarding technical barriers, for 100kW projects, the capacity limit requires technical expertise. For projects in the 200kW category, the requirement for a full-spec medium voltage substation is will be a barrier to applicants to the SSG, due to the increased complexity of the project. Projects in the 500kW category also face technical barriers by way of grid upgrades, which are complex of themselves.

There are financial barriers for projects falling above the 500kW capacity limit category. For these projects, the route to market contains considerable risk as there is uncertainty regarding their financial viability. For projects in the 200kW category, the substation and the planning and connection applications and processes create additional cost implications when compared to lower-scale projects.

Question 10 (b): Are there specific barriers impacting Community projects, or projects in agricultural, rural, urban or island settings? How can these barriers be overcome and what innovative solutions could be applied? Please provide evidence to support your answer.

Regarding rural projects, low grid capacity and transmission connectivity may prove to be a barrier to uptake of the scheme. Grid capacity tends to be considerably limited in rural communities who are likely to have the ability and land needed to deploy these projects. However, costs involved to increase capacity can be sizeable, acting as a significant deterrent to deployment. In addition to low grid capacity, the grid in rural areas tends to not be distributed. This may cause purely-export projects to be faced with high costs arising from installing a long electric connection in order to reach the existing grid. Finally, ground-mounted projects will likely be faced with significant land expenses and local authority rates that negatively impact project finances and, therefore, present an important barrier for feasibility.

Consequently, improving grid connectivity to rural areas should be prioritised, along with integrating the mandatory requirements which are essential for meeting interconnecting distributed generation to the grid, in order to ensure safe and reliable operation. This is important for making the SSG suitable for rural communities.

Though many of these projects are administrated by communities, stakeholder alignment may also prove a barrier to Community projects. While this model has seen multiple successes – as evidenced by the oversubscription of the community category in the RESS-1 auction – we agree with our colleagues at the SEAI that it can be difficult to scale. Delays may also be problematic. Community actors must come together and remain organised for these projects to succeed. Often, communities also face difficulties accessing financing and lack the capacities needed to develop and manage these projects or the associated external service and equipment providers.

Question 10 (c): Are there barriers specifically regarding constraints and curtailment that may need to be considered in the SSG design? Please provide evidence to support your answer.

For capacity limits between 1,000kW and 6,000kW, a Remote Terminal Unit (RTU) is required, so that the network operator can have both visibility and control – including the ability to curtail – the generator. Although curtailment can have a relatively low impact on most projects below 1 MW capacity, it can have a high impact on projects above this threshold, depending on the voltage of the connection and the area in which it is connected. Costs may then prove a barrier as they will increase due to the equipment and required communications and certification requirements.

Question 11 (a): Do you agree that SSG projects should be required to establish a Community Benefit Fund? Should payments under the SSG Community Benefit Fund vary by project type and size (large commercial, agricultural etc.)?

Having learned from Ireland's experience with offshore energy generation sites, Chambers Ireland is concerned about breaking the link between the developer and the local community. Unlike offshore wind farms, it is unlikely that communities may feel as though the utility of their environment is diminished due to the nature of rooftop technology being so localised. However, if it is the case that some communities experience some form of disruption as a result of the construction of ground-mounted solar systems, they may resent the works which they will see as being carried out for the benefit of others. It is our view that the key to addressing local opposition to renewable energy projects is to ensure local ownership of their development, with particular emphasis on making visible how the local community would benefit from these projects. This includes the creation of employment. Individual developers are also motivated to ensure that communities have a high degree of social acceptance, and the flexibility to understand local social and political constraints. It seems unlikely that a centralised national body would have the same granular understanding on the ground, and indeed could be prevented from using benefit funds strategically leading to the perception that the primary beneficiaries of the Community Benefit Funds are those who get to administer them.

Question 11 (b): Are there any alternative means of ensuring that projects receiving SSG support benefit the local community, and in particular financially vulnerable

customers and those at risk of energy poverty in urban/rural/island settings? Please provide evidence to support your answer.

Chambers Ireland's position is that only a small portion of the Community Benefit Fund should be managed at the national level. Using a common scoring system for all fund applications, all communities, and all members of communities could expect an impartial and nationally consistent consideration of funding applications would be an ineffective way of funding. This would guarantee that monies would be disbursed widely and thinly, which will preclude those at risk of energy poverty from taking part in the SSG.

Question 11(c): Are there any alternative means or evidence from other jurisdictions of ensuring that projects receiving SSG support benefit the local community, and in particular financially vulnerable customers and those at risk of energy poverty?

As referenced elsewhere in our submission, there are numerous examples of communities in economically-deprived parts of the UK with vulnerable customers who benefitted from such community projects. This should be replicated in communities with vulnerable customers in Ireland. The reinvestment value from community-administered projects into such communities manifests itself in better societal gains. A report[7] from the UK indicated that the value of such schemes lies in their ability to develop solar PV schemes on social housing. This model requires much cooperation; organisations such as Repowering London work with local authorities, and local authorities. The real value manifests itself as the profit from their renewables projects being reinvested into their outreach work supporting fuel-poor households.

Question 12: A common 6% discount rate across all sectors assessed was chosen as an input to the viability gap assessment. Do you agree with this approach? If not, please provide evidence to support your answer.

We agree with the 6% discount rate which was chosen for the viability gap assessment.

Question 13: Do you agree that battery storage does not represent a cost-effective option for targeted supports under the SSG? If not, please provide evidence to support your answer

This is a double-edged sword. Regardless of the financial cost involved, until adequate grid infrastructure exists to export the generated electricity, batteries provide an interim solution for storage and should be considered to also encourage self-consumption. This is particularly relevant considering the possibility of future blackouts. Not including any consideration of storage in the policy design may even disincentivise uptake.

However, it should be noted that installations with storage options in many cases have significantly higher viability gaps than those with no storage. They therefore may not be financially viable solutions. The reason for this is that self-consumption creates savings for the installation by minimising the amount of generated PV energy that is exported to the grid and, therefore, is not remunerated to the owner of the installation. It also entails more costs for the system, making the viability gap greater than it would be otherwise. This should be considered when assessing battery storage for the SSG.

7 Report available here: https://www.cse.org.uk/downloads/file/bringing-local-energy-benefits-to-deprived-communities.pdf

Question 14: What, if any, delivery dates/deadlines should be applied to projects receiving funding under the SSG? Please provide evidence to support your answer.

Chambers Ireland does not have a position on this topic.

Question 15: What is an appropriate level of ambition, in terms of MW supported, for the scheme, based on the potential and appetite for small-scale generation in Ireland? Please provide evidence to support your answer

The fundamental message which should be emphasised is that the more MW that is supported, the better. The logic for this is in part determined by the fact that the tariffs set by the MSS scheme are currently not set at a high enough level to encourage uptake. In the unlikely event the tariffs are set too high, then this can easily be remedied. We do not anticipate the same problems the UK had when feed-in-tariff systems initially were set too high, which necessitated curtailment. The Irish system is subject to enough control to regulate this.