

Response to applicant query on the basis for firm access allocation within Gate 3 – addendum

The System Operators provided a report to the Commission on the 22nd September 2009 in response to a query received from a Gate 3 applicant on the basis for firm access allocation within Gate 3. Further to queries raised by the Commission the System Operators have prepared an addendum to that report to provide clarification in particular to some of the difficulties were the System Operators to seek to implement Option 2 and also expand upon Option 1 of the report.

Difficulties in Implementing Option 2

Extract from Joint Report issued to CER on 22nd September 2009

- ”3. Applications included in Gate 3 were received over a three and a half year period. Over this time both processes used in assessing application forms submitted, and the application forms themselves have evolved such that it is difficult to define a consistent rule for what is necessary information
4. The System Operator’s had different processes for dealing with applications as they were received, and therefore consistency of treatment between the System Operator’s is also an issue ¹”

Applications included in Gate 3 were received over a three and a half year period, from 2004 to 2007. Over this time the demand for renewable generator connections, and the level of renewable generation connected, has grown considerably. This is particularly the case with wind energy.

Over time the level of information required by the System Operators to deem an application complete has altered with certain information now only being required at a subsequent stage. Moreover, a number of different application forms requesting different information were employed at different times over the period.

In addition over the three and a half year period, work processes have evolved (in response to the increased demand for connection, and indeed revisions in policy to deal with this growing area) to streamline the processing of application forms.

The unintended impact of the above changes would lead to the potential for a level of inconsistency (even where applicants had applied to a single System Operator) between treatment of applications over the course of 2004-2007.

Added to the above, however, applications were being managed by two different parties, who – at any given point in time – did not have fully co-ordinated processes, and

¹ Given that the rule for inclusion in Gate 3 by necessity had only to be applied over a short time period and that the rule was applied exactly to overcome inconsistencies between the System Operators, these concerns do not arise with regard to inclusion in Gate 3

therefore consistency of treatment between the two System Operator's would also potentially be an issue.²

Taking all the above into account it could be considered that it would be impractical or at least difficult in the extreme to try adopt a single consistently verifiable system for checking applications for completeness over a three and a half year period.

Option 1

Option 1 is to allow allocation of firm access on the basis of a physical date stamp, an electronic date stamp (where an application was submitted in the first instance electronically) and/or correspondence to the customer advising them of their receipt date.

Such a system is verifiable and since these dates have been in the public domain for a considerable period of time, one would assume be unlikely to be disputed.

² This is the primary reason that a decision was taken to move away from 'pure' deemed complete date for the purpose of inclusion of applicants in Gate 3.