



Modification Fees for Connection Offers

September 2012

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1. Introduction and Background

This document outlines the process for dealing with modification requests (as set out in Section 3), and the fees chargeable to the customer (Section 4) when applying for modifications to Connection Offers issued by either ESB Networks, in its role as the DSO, or EirGrid, in its role as the TSO (together known as the “System Operators or SOs”).

The fee structure and the leadtimes associated (below in Section 4) are based on a number of assumptions which are described in Section 5. Following the consultation process, the fee structure has been updated and is standardised around 8 categories. Appendix 1 includes some specifics as to how different regularly occurring categories of modifications would be treated under this system. This appendix has also been updated following the consultation process and consideration of industry comments.

As set out in the consultation, a standardised approach is deemed more appropriate for the following reasons:

1. As with standard pricing, and application fees, a standard fee for modifications provides more certainty and transparency to the industry;
2. The proposed process allows the SOs sufficient flexibility to match the fees fairly to the work expected to be required over time;
3. A process whereby modification fees are standardised and are advised and paid prior to processing:
 - a. allows a party assess whether they wish to proceed with the modification request in full knowledge of the cost;
 - b. allows the SOs in some cases to process modification requests prior to offer acceptance (as allowed for in Section 20.1 of the Connection Offer Process and Policy paper);
 - c. gives a clear signal that the timeframe for completing the modification request has commenced;
4. The fees are also calculated to enable a level of resource be available to deliver modifications within reasonable timelines (which are included in the assumptions);
5. There is an efficiency that comes with standardisation which means less administration in calculating individual fees. This means that there is more time available for customer engagement, and modifications can be processed more quickly; and
6. A prepaid approach helps to reduce the occurrence of spurious modifications. The elimination of such modifications would help to concentrate scarce resources where they are needed.

Overall, the SOs consider that a standardised pre-paid system will provide a real benefit to the industry by having a practical, consistent and effective method for processing modification requests. From an assessment of the responses received to this consultation, it would appear that the industry in general agree with the standardised approach

2. Modifications processed free of Charge

As set out in the consultation paper there are a number of modifications which are processed by the System Operators at no charge to the parties to whom the modified offer will issue. These are set out in the table below

Basic Type	Types of Modifications
Application Data	Provision of Applicant Specific Data where original application was based on assumed data (One submission only. Second and subsequent will be charged)
Change to internal network (provision of as built information)	Change to internal network
Offer Validity Period ¹	Extending offer validity period
Subgroup Reprocessing	Subgroup dropout and reprocessing
Accelerated Works	Assessing whether works can progress in advance of full group turn-out ²
System Optimisation	Modifications driven by system optimisation and other system operator requirements
Commercial terms	Change in bonding regime as per cer/09/138
Application Data for applicant in queue	Where an application has been submitted but has yet to be approved for processing, the first such change will be processed at no charge and a level 1 will apply thereafter.
Some instances of Change in Longstop Date	Where the delay in progressing the project has been due to a delay on the part of the SOs such a modification will be progressed free of charge

While the above modifications are progressed free of charge, they do have the potential to impact on delivery where a large number of such modifications are received.

3. Modification Application Process

When submitting a request for modification the customer should provide the following:

- The general modification form (Appendix 2);
- One or more of the forms listed in the general section (ref Appendix 2) depending on the modification(s) requested
- Any consents required from other parties
- Initial modification fee of €853 plus VAT³; and
- Any supporting documentation required.

Typically either a NC5 (full technical criteria) form or a NC5A (reduced criteria) form from will also be required, If the applicant is unsure as to what form to submit the relevant SO can be contacted to confirm

¹ Due to current circumstances with Gate 3 offer validity periods it is anticipated that these modification requests will be very limited in number and the assessment required. This will be subject to particular review

² This has been a feature of some of the Gate 3 acceptances to date. It is intended that such an assessment would only be carried out where there is an extended validity period for some or all of group members. The assessment will be to ensure that there is no excessive risk to the End-User in progressing a project

³ In the event that the modification progresses, the initial deposit will be netted from the full modification fee.

The application form, the modification form and any cover letter included should be signed by an authorised person from the company (usually a Secretary/Director) and submitted in hard copy and soft copy. The cover letter should be on company headed paper. The process for progressing is then as below

1. Once a modification request has been received, it will be assessed by both SOs to determine:
 - a) Whether the modification can be processed⁴;
 - b) Whether all the information required has been included;
 - c) The appropriate level of the modification request, and the corresponding fee which should apply; and
 - d) An expected lead time for delivery of a modified connection offer.If insufficient data is available to make such an assessment, the SOs will request further information from the customer and confirm the applicable fee once satisfactory information has been provided.
2. Once all the information required is available, and the fee and lead time for delivery has been established, the customer will be advised of the scope of the modification, as understood by the SOs, and must confirm in writing that they wish to progress;
3. Upon receipt of the confirmation an invoice will be issued for the balance of the modification fee. The timeline for processing of the modification request will commence once the fee has been paid, and any outstanding information or clarifications have been provided.

It should be noted that a modification request may lead to other construction works on a project or other projects being put on hold temporarily. The decision as to whether construction works should be put on hold would depend on a number of factors including whether the modification has potential to change the connection works required.

Timeline for Customer Response

In the event that the customer does not:

- respond to a request for clarification or
- confirm that they wish to proceed with a modification or
- pay the balance of the modification fee

within a period of three months, all the application information and work carried out in checking the application shall be discarded and the initial application fee payment forfeited. This policy may be waived only in exceptional circumstances. The customer shall be required to restart the process should they then wish to proceed with the requested modification.

⁴ The Connection Offer Process and Policy paper sets out a variety of rules indicating where modifications are allowable, and in which scenarios modifications may not be allowed.

Multiple Modifications

While in theory there is no limit to the number of modifications which can be processed the following should be noted:

1. For purposes of efficiency, if there are a number of different changes requested to a connection agreement these are best processed at the same time;
2. Should additional changes be submitted post commencement of a particular modification, the time line for delivery of the modified offer will most likely re-start and additional fees are likely to apply;
3. To avoid the potential for multiple modification requests to impact on delivery of renewable targets, in general the SOs consider the original longstop dates for the Connection Agreements should continue to apply; and
4. Except where more than 3 changes are requested and as set out in Section 7, customers will generally only be charged on the basis of the highest level applicable to the modification request i.e. they are not additive. (Section 7 provides more specific guidelines as to how requests for multiple modifications will be charged.)

Please note this principle applies even where the modification fee is capped at the appropriate application fee. See Section 4 below.

4. Modification Fees

Basis for Calculating Modification Fees

The basic principles applied when standardising the fees was that:

1. Any fee structure should be consistent regardless of whether a distribution connection agreement or a transmission connection agreement was being modified; and
2. As with application fees, some account should be given to smaller applications so that the fee is reduced to be less than fully cost reflective. For this reason the modification fee chargeable to a given project will be capped at the application fee that would be applicable to the MEC⁵ of the project. This will be regardless of the complexity of the modification requested. For example, a project of 499kW will never pay more for a modification than €1516⁶, or the revised application fee for the current year.

It was also clear that for standard fees that an increasing scale should be applied for degrees of complexity rather than applying a specific fee for a particular category of modification.⁷ Taking on board these considerations the SOs noted the following areas where significant under-recovery was likely.

1. The individualised cost for a level 1 modification is well above the €1000 that was previously set out by the CER as the maximum fee for administering such modifications. The level one fee is now proposed to be further reduced to €853. As a result this cost was spread across the other levels.

⁵ Actual MEC rather than change in MEC

⁶ Fee applicable to 30 September 2012

⁷ Different types of modifications are listed in Appendix 1

2. It was decided to apply a fee cap so that applicants will only pay up to what they would have originally paid for processing the application first time. This cap is determined by the current fee for processing a new application of the same MEC assuming shallow works are required. This fee cap therefore does not reflect full cost recovery, but does protect smaller applicants from higher fees. This principle is in line with the principle adopted for application fees. While the SOs understand that CER agree that this under-recovery should be balanced across the levels, the fee reduction calculated by CER's consultant does not – in the first instance – allow the SOs to recover the cost of allowing for the cap.
3. Transmission customers which are of a comparable size and/or complexity to a distribution customer will drive less costs individually as they impact only on the Transmission System and as such only have to be assessed by one SO. As per the current capacity application fee structure customers will pay the same fee regardless of whether they are connecting to the transmission or distribution system. This under-recovery on customers connecting to the distribution system was balanced across the levels.

Taking all the above into account a balancing process was carried out by the SOs to determine the appropriate fee for each level which would enable sufficient cost recovery overall to process the assumed number of modifications for each SO, while being consistent with the original overall principles. This fee schedule was then revised by CER.

Modification Fees Table

Table 1 outlines the fees (ex VAT) which CER propose are applicable to a given complexity of modification. The SOs will determine the appropriate level of fee based on the table below for each individual application and the general principles set out in Appendix 1.

Level	Initial deposit (excl VAT)	Balance of fee (excl VAT)
Level 1	€853	-
Level 1.5	€853	€4,290
Level 2	€853	€8,581
Level 2.5	€853	€13,020
Level 3	€853	€17,459
Level 3.5	€853	€21,066
Level 4	€853	€24,773
Level 5	€853	As per Standard Application Fee Schedule published separately by the SOs

Table 1: Fee Structure

5. Further Reviews and Implications of Same

The fees and timelines quoted are based on a number of assumptions which are believed to be a reasonable estimate, at this point in time, as to the number and range of modifications that will be

requested over the next two years or so. The fees are intended to be cost reflective and the SOs intend to review the fees to compare the overall costs incurred on processing modifications versus the fees collected, once a sufficiently representative number have been processed. This intention has also been confirmed by CER's draft decision

In the event that the actual outcomes are considerably different from the assumptions, and the SOs are faced with the potential for a significant under-recovery of costs reasonably incurred, the SOs reserve the right to remedy the situation, which may include reviewing the fees and fee structure. In addition, should the costs incurred be less than the fees collected, a reduction in fees may be appropriate for future years.

.Where the impact of a change in the assumptions is assessed to primarily affect the delivery timeline, the SOs will advise/update those affected of the estimated delivery date of the modifications.

6. Assumptions for Modification Fees

The following assumptions have been used to determine the modification fees and are provided in order to give a more complete understanding to applicants regarding the underlying information upon which the SOs have developed these fees.

1. Guidelines

The fees quoted are based on future assumptions which remain very uncertain and are the best estimates at this point in time until offer validity periods commence. They are valid so long as the flow of modifications is broadly in line with assumptions

2. Lead Time to acceptance

Based on the experience of Gate 2 and allowing for the experience of the industry in general, the SOs expect that the vast majority of modifications requests will be received within a two year window from offer acceptance.

3. Acceptance Rate

Based on feedback from the industry pre-consultation, the SOs expect approximately 70-80% of offers to be accepted. More recent indications are that this figure may decrease, however no further adjustment has been made to cater for this uncertainty. Based on Gate 2 on average the expectation is that each offer would be modified at least once⁸.

4. Lead times for processing applications

The SOs believe that the following processing lead-times are viable:

⁸ Over the course of Gate 2, DSO in particular recorded a high level of Change of Legal Entity (CoLE) in addition to other modifications

Form of Modification	Typical Lead-time from Official Commencement
Level 1	20 business days
Level 1.5	45 business days
Level 2-4	90 business days
Level 5	Customised

Table 2: Table of lead-times

However, as set out in Section 3 above, a specific target delivery timeline for modifications will be advised to the customer once the required information has been submitted by the customer. The Official Commencement of the modification will be once the scope of the modification has been formally confirmed by the customer; all fees payable have been paid; all required information has been provided by the customer and any other requirements as identified in communications to the customer. The timelines above are the amount of time that the SOs generally expect to require to process a modification. Where possible the SOs will issue modified offers in advance of these dates. On occasion, however, and particularly for complex modifications the typical timelines will be exceeded. An example of a complex modification would include underground cabling of 110kV or 220kV circuits, Where the SOs consider that a modification is particularly complex then the SOs will engage with the customer to explain the complexity of the assessment and advise of a specific target delivery timeframe.

5. Workflow

While acknowledging that there will be peaks and troughs in the workflow, the calculation of fees and timelines is based on an average capacity of around 15 modifications over a quarter. This allows for a normal rate of modifications request of 5 per month. This has inbuilt capacity to stretch for a limited duration by 20-50% and still be expected to be practical to deliver within the lead times outlined in table 1 subject to the clarification regarding complex modifications above. This also accounts for a limited reprocessing of sub-groups due to non-acceptance of offers where appropriate.

6. Level of Engagement

It is acknowledged that some modification requests are more complex than others and will require additional engagement which the SOs have endeavoured to account for in the differing levels above. It is assumed that, in general, and on average, no more than two meetings will be required with an applicant/subgroup during the modification process and a reasonable level of email queries will be addressed.

7. Annual Adjustments

The modification fees quoted are assumed to be in 2012/2013 money, and are subject to an annual adjustment in line with CPI/HICP and will be included as an appendix in the annual

EirGrid Statement of Charges. ESNB will publish the updated charges on their website as per current practice with application fees.

8. VAT

The fees are subject to VAT at the appropriate rate.

7. General Principles

This section sets out the general principles which apply when determining the level of fee for a given modification and also – in group scenarios – which party or parties are liable for the fee. In the event that the principles are not directly applicable to a given case, the SOs will endeavour to apply the general principles in a fair and equitable manner.

- 1.** Where a subgroup is potentially affected by the modification(s) requested by a member of that subgroup, the customer requesting the modification(s) should ensure that the other members of the subgroup are aware of the potential impact and that there are no objections to the modification.
- 2.** Where there is a potential impact on another customer's connection method, the customer requesting the modification may be obliged to provide evidence of consent from the other customer(s) to proceed. This is in line with the general principle of unanimous decision making within subgroups. Where a modification drives change to other customer's connection offers, the customer driving the changes shall be responsible for payment of the associated fees for modifying the other connection offers. Principles around the level of fee chargeable are set out in 7. below
- 3.** A fee will be charged per new connection offer issued. For a merger of a number of projects into one, therefore, a single modification fee will be charged. In this case the applicants shall nominate which applicants should be invoiced the applicable modification fee. Where a project is split, such that 2 or more new offers are issued, a fee will apply per each new offer. The two fees will be charged to the applicant requesting the split.
- 4.** Changes in the connection method which arise as a result of the detailed design process – typically minor changes to circuit length – will usually be accommodated as part of the standard process, and the changes in the connection method and associated costs will be formally advised to the customer as part of the process of advising pass through costs. However in some exceptional cases, such changes have the potential to drive a more fundamental change in connection (for example a change to conductor size, or even a change in voltage level). In such cases it may be necessary to process this change as a SO driven modification.

5. Where there are a number of modifications (to a single connection agreement) requested together the level that will be applied will typically be the highest level for those particular modifications where they are largely driven by the same work. See example 1 below:

Example 1: The same applicant submits a modification for:

- 1) A change in generation unit with no significant change in shallow works expected (level 2.5 – mainly driven by Technical Studies)
- 2) Merging projects with no significant expected change to shallow works (level 2.5 mainly driven by Technical Studies)
- 3) Capacity Relocation with no significant expected change to shallow works (level 1.5 mainly driven by Technical Studies)

The level that will be applied is the higher of the above i.e. a level 2.5

In some cases, where there are a high number of modifications being processed (i.e. greater than 3), and even where the driver is the same it may be appropriate to increase the fee level by 1.

6. Where a number of similar type modifications are submitted which involves differing main drivers (e.g. Technical Studies AND Construction Assessment), the level which will apply is the highest level of those modifications plus 1 level as per example 2 below.

Example 2: Applicant submits a modification for:

- 1) A change in generation unit with no significant change in shallow works expected (level 2.5 - mainly driven by Technical Studies)
- 2) Change to decision to contest where applicable (level 2 – mainly driven by Construction Assessment)
- 3) Capacity Relocation with no significant expected change to shallow works (level 1.5 - mainly driven by Technical Studies)

The level that will be applied is the higher of the above plus 1 i.e. a level 3.5

7. In some cases there will be economies of scale to be achieved in processing modifications for a number of different members of a sub-group – even where the modifications requested are not the same. For example, one member of a sub-group may request a change which by its nature drives changes to shared assets. Prior to re-issuing all offers another sub-group member may request a change to their dedicated works. As a general principle where the work done for one modification can be used for other modifications being issued at the same time or within a reasonably timeframe, the standard charge for the modification requested will be charged for only one of the applications/offers issued. The other offers within the subgroup to which the modification work can be applied shall typically be charged on the basis of a 1.5 level to cover the administration, updates to the contracts and minor assessment work. The

fee cap that will be applied for the main modification work shall be that of the largest customer in the sub-group.

Where such a scenario arises the bigger fee shall be applied to the original requesting party (based on date of receipt of modification request) unless there is agreement between the parties otherwise. Where there is agreement between the parties, or all parties request the modification (for example for a change to shared assets), the total fees will be shared equally across the group. Where one party requests a change to shared assets and the other parties agree, but do not request, the fees for modifying all offers will be charged to the party requesting the modification (in line with 2 above)

This type of request is likely to be mainly applicable for connection method changes to shared assets. In addition this principle may be applicable where a project is being split.

- 8.** Requests to repower or refurbish a generation plant shall be assessed according the number and type of changes required by the applicant such as extension to term, change in turbine type, etc. The fee shall be calculated in accordance with the examples above (5 and 6).
- 9.** In a case where the SOs agree to process a modification and subsequently determine that it is not possible or appropriate to progress it the customer shall be refunded the modification fee paid less the original €853 paid to assess the application.
- 10.** Where a customer requests the reissue of a modified offer with minor changes to what was previously issued, within 3 months, only a Level 1 charge will apply for the re-issue provided circumstances have not changed on the system compared with the basis for the original modification.
- 11.** Where a modified offer has been issued but has not been accepted, rejected or lapsed, then in line with the principles set out during Gate 3, studies for subsequent parties will assume the offer has been accepted.

8. Contact Details

Contact details for modification related queries are:

ESBN: Email : DSOGenerators@esb.ie

EirGrid: Telephone + 353 (01) 7026642 email: info@eirgrid.com

Appendix One – Categorisation of Modifications

Table 3 below sets out the fee schedule. Tables 4, 5 and 6 have been set out to give as clear an indication as possible as to what level fee will apply for a particular type of modification. This list has been updated since the original publication following some experience by both SOs and a review of the responses received from industry on the consultation and there may be further refinements and clarifications once more experience is gained. The modification fee chargeable to a given project will be capped at the application fee that would be applicable to the MEC⁹ of the project.

Table 3 – Fee Overview

Level	Initial deposit (excl VAT)	Balance of fee (excl VAT)
Level 1	€853	-
Level 1.5	€853	€4,290
Level 2	€853	€8,581
Level 2.5	€853	€13,020
Level 3	€853	€17,459
Level 3.5	€853	€21,066
Level 4	€853	€24,773
Level 5	€853 ¹⁰	As per Standard Application Fee Schedule published separately by the SOs

The types of modifications listed in Tables 4, 5 and 6 below are a list of the currently known typical modification requests. As new types of modifications are requested the SOs shall apply the appropriate level and update the list periodically.

⁹ Actual MEC rather than change in MEC

¹⁰ Applications for a new connection or an increase in MEC will require a €7000 initial payment as per standard practice

Table 4 - Modifications to be processed at no charge

Basic Type	Types of Modifications	Level	Main Driver	Change from consultation paper
Application Data	Provision of Applicant Specific Data (One submission only. Second and subsequent will be charged as per above)	0	Tech Studies	No
Change to internal network (provision of as built information)	Change to internal network < 1 km of total conductor lengths	0	Commercial	Down
	Change to internal network > 1 km of total conductor lengths	0	Tech Studies	Down
Offer Validity Period (see note 1)	Extending offer validity period	0	Commercial	Down
Subgroup Reprocessing	Subgroup dropout and reprocessing	0	All	No
Accelerated Works	Assessing whether works can progress in advance of full group turn-out	0	All	No
System Optimisation	Modifications driven by system optimisation and other system operator requirements	0	All	No
Commercial terms	Change in bonding regime as per cer/09/138	0	Commercial	New
Application Data for applicant in queue – first change only	Where an application has been submitted, it may be possible to change details, while maintaining queue position. The first such change will be processed at no charge.	0	Commercial	New

Table 5 – General table of chargeable modifications ¹¹

Basic Type	Types of Modifications	Level	Main Driver	Change from consultation paper
Name Change	Applicant Name Change/Change of Legal Entity	1	Commercial	No
Application Data for applicant in queue – second and subsequent changes	Where an application has been submitted, the first such change will be processed at no charge and a level 1 will apply thereafter.	1	Commercial	New
Merger	Merging projects with no significant expected change to shallow works (note 2)	2.5	Tech Studies	Up (note 4)
	Merging projects with significant expected change to shallow works	4	All	No
Splitting	Splitting projects with no significant expected change to shallow works(note 2)	2	Tech Studies	No (note 4)
	Splitting projects with significant expected change to shallow works	4	All	No
Relocation	Capacity Relocation with no significant expected change to shallow works (note 2)	1.5	Tech Studies	No
	Capacity Relocation with significant	4	All	No

¹¹ Table 6 covers changes to specific data in particular

	expected change to shallow works			
MEC Change	Decrease in MEC with no significant expected change to shallow works (note 2)	1.5	Commercial	Down
	Decrease in MEC with significant expected change to shallow works	4	All	No
	Increase in MEC	5	All	No
MIC Change	Decrease in MIC with no significant expected change to shallow works (note 2)	1	Commercial	No
	Decrease in MIC with significant expected change to shallow works	4	Commercial	New
	Increase in MIC	5	All	No
Change to overhead or underground cable	Change from overhead line to underground cable or vice versa for connection method with no significant expected additional change to shallow works (note 2)	1.5	Tech Studies	Down
	Change from overhead line to underground cable or vice versa for connection method with significant potential additional change to shallow works	4	All	No
Temporary Connection	Temporary Connections	4	All	No
Phasing	Phasing Projects as per COPP ruleset	2.5	Construction and Commercial	Down
	Phasing legacy projects (no impact on connection works timeline)	1.5	Commercial	New
Extension to term of contract	Extension to term of contract with no significant expected change to shallow or deep Transmission works (note 2)	1.5	Commercial	Up
	Extension to term of contract with expected change to deep Transmission works but no expected significant changes to shallow works	3	Technical and Commercial	New
	Extension to term of contract with significant expected change to shallow works	4	All	No
	Extension to term of contract with expected significant change to shallow and deep Transmission works	5	All	New
Longstop Dates	Change to longstop dates where allowed	1.5	Technical and Commercial	New
Contestability	Change to contestability decision where allowed	2	Construction and Commercial	No
Metering	Change to sub metering arrangements	1.5	Construction and Commercial	New
	Change to main metering arrangements	2	Construction and Commercial	No
RTUs	Change in number of RTU devices	2	Construction and Commercial	New
Firm or non-firm	Change in choice of a firm or non-firm/firm offer where no shared shallow works	1	Commercial	New
	Change in choice of a firm or non-	2.5	Construction and	New

	firm/firm offer where shared shallow works		Commercial	
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Notes on Table 4 and 5

1. Due to current circumstances with Gate 3 offer validity, it is anticipated that modifications to extend the offer validity period will be limited in number. This fee level will be subject to particular review
2. 'Significant expected change' means where the SOs believe that the modification requested has a material impact on the connection method that was originally offered to the customer (beyond the specific change requested) and therefore is likely to affect the connection charge. Assets chargeable to the customer are as set out in the Quotation letter (DSO customers) or Offer Letter (TSO customers). Any changes to these assets would be considered significant. Primary examples of this would be where one or more of the following is likely to be changed:

Shallow Works (TSO & DSO)
Number or size of connecting stations
Number of circuits and associated terminations
Number of couplers in a connecting station
Length, type or rating of the circuit(s)
Number or rating of transformers
Number or rating of bays
Increased busbar rating
The modification requested causes changes to the asset sharing arrangements or other Connection Method changes to another connecting or connected customer
Requirements to introduce bonding arrangements to cover potential stranded assets
Deep reinforcement (DSO)
Changes in circuit reinforcement requirements
Changes in station reinforcement requirements
Changes in protection requirements

These types of changes impact on the works, costs, leadtimes and legal assumptions contained in the original connection offer and therefore require significant reassessment by the SOs across the technical, commercial and construction related drivers.

2. For the avoidance of doubt, all references to shallow works in the table should be taken to also include deep distribution works.
3. Merging and splitting drive similar technical studies, and similar levels of assessment from the technical perspective. However merging gives rise to only one Connection Offer being issued and therefore the cost of the work has to be covered by one modification fee. On review, and following the introduction of additional levels, the SOs consider that a 2.5 fee is most appropriate for a merger. In relation to splitting, while the bonding arrangements can be complex, the work undertaken will be recovered via more than one fee. Therefore on balance a level of 2 is considered to remain appropriate.
4. Unlike the majority of modification requests where it has been possible to provide clarity on when a modification is considered to be significant, the impact of a change from overhead line to cable or vice versa, particularly for lower voltages, can be dependant on the strength of network to which a customer is

connecting. However, prior to progressing with a modification, the customer will be advised of the fee level. Should a higher level fee be required the SOs intend to advise the reason in the letter advising of the modification fee

Changes to Applicant Specific Data (Table 6 below)

The following general principles apply

1. Where an offer was originally processed based on assumed data, as was the case with the majority of Gate 3 offers, the initial provision of Applicant Specific Data will be processed free of charge. This will be the case for one submission only provided it is submitted on time. Second and subsequent submissions, or late submissions, will be charged as per table 6 below.
2. Where an offer was originally processed based on specific data (and even where a modification was subsequently processed based on assumed data), and the customer wishes to submit a change to this data then the levels set out in table 6 below will apply. It should be noted, however, that in order to avoid any delays to energisation customers are obliged to submit their final specific data no later than one year in advance of energisation (or 6 months in the case of offers pre 2009), or as set out in their Connection Agreement. Should the customer submit the data within the required timeframe, the fee level will be reduced by 1.

Table 6 – Changes to Applicant Specific Data

Basic Type	Types of Modifications	Level	Main Driver	Change from consultation paper
Change to generation turbine/unit(s)	Change to generation turbine/unit ¹² with no significant expected change to shallow works	2.5	Tech Studies	Down
	Change to generation turbine/unit ¹³ with significant expected change to shallow works	4	All	No
	Change to number of generating turbines/units with no significant expected change to shallow works	2.5	Tech Studies	Down
	Change to number of generating turbines/units with significant expected change to shallow works	4	All	No
Reactive Power Devices	Change to reactive power compensation devices	2	Tech Studies	No
Transformer Changes	Change to grid connecting transformer(s) specifications	2.5	Tech Studies	Down
	Change to number of grid connecting transformers	3.5	All	Down
House Load	Change to house load	1	Commercial	No

¹² Including wind turbine changes etc.

¹³ Including wind turbine changes etc.

Appendix Two – Modification Forms

Supplemental application for Modifications to Generation Connection Offers

When submitting a request for modification the customer should provide the following:

- The general modification form;
- One or more of the forms listed in the Part 1 and Part 3 below depending on the modification(s) requested;
- Initial modification fee of €853 +VAT; and
- Any supporting documentation required.¹⁴

Typically either a NC5 or full technical criteria form (“Full Form”) or a NC5A or reduced criteria form (“Short Form”) from Section 1 will be required. A Full Form will generally be required if

- the modification is requested within one year of expected energisation;
- there is a change to an already submitted Full Form and the applicant wishes to submit a full rather than a short form;
- the customer is already connected and wishes to change some of the original information provided

A Short Form will generally be accepted for all other cases. If the applicant is unsure as to what form to submit the relevant SO can be contacted to confirm.

All requests shall be assessed in accordance with the appropriate technical standards, policy requirements and impacts on the electrical system and/or other users of the electrical system. Therefore in some cases it will not be possible to facilitate a modification request. For customers submitting a request for modification of a Transmission connection agreement this should be done in accordance with the General Conditions of Connection and Transmission Use of System¹⁵. This Appendix serves only to complement these provisions and to clarify the administration behind it.

Below are examples of the forms to be used. For the most up to date version please see

- Transmission Applicants - <http://www.eirgrid.com/customers/gridconnections/generatorconnections/>
- Distribution Applicants - [Connect a Renewable Generator : ESB Networks](#)

¹⁴ Please note in a number of cases an IPP is required to submit consent from other parties and/or a declaration in a standard format/template. These templates are still in development. Should a modification to be processed require such a form please contact the SO directly and a form will be provided

¹⁵ Available at

<http://www.eirgrid.com/customers/gettingconnectedandmodifications/supportinginformation/>

Part 1	Component parts	Yes / No
NC 5 form (DSO) ¹⁶ /Full Technical Criteria (TSO) ¹⁷	Change in specific Data – as provided in NC5 or TSO Full Technical Criteria Form	
NC 5A form (DSO) ¹⁸ /Reduced Criteria (TSO) ¹⁹		
Part 2		
General modification form		
Part 3		
Section A	Change to overhead line or underground cable	
Section B	Change in contestability	
Section C	Connection Point Relocation	
Section D	Capacity Relocation	
Section E	Merging of two or more existing applications	
Section F	Splitting of capacity of an existing application	
Section G	Change to Connection method	
Section H	Change of internal collector network	
Section I	Application for Temporary Connection	
Section L	Phasing	
Section M	Extension to term of connection agreement	
Section N	Extension to Longstop dates	
Section O	Change to metering arrangements	
Section P	Change to number of RTU devices	
Section Q	Change to bonding regime	
Section R	Change to offer validity period	
Section S	Change of Legal Entity	
Section	Refurbishing/repowering	
Section	Change to firmness	
Section	Number and/or type of transformers	

Notes:

MEC Change (application form only required – i.e. no additional mod form)

MIC Change (application form only required i.e. no additional mod form)

¹⁶ <http://www.esb.ie/esbnetworks/en/commercial-downloads/NC5.pdf>

¹⁷ For Wind - <http://www.eirgrid.com/media/Application%20form%20for%20Connection%20of%20Wind%20Generation%20Facilities.pdf>
For Conventional - <http://www.eirgrid.com/media/Application%20form%20for%20Generation%20Facilities.pdf>

¹⁸ <http://www.esb.ie/esbnetworks/en/commercial-downloads/NC5A.pdf>

¹⁹ [http://www.eirgrid.com/media/Reduced%20Criteria%20Generation%20Application%20Form%20\(Versio%201.1%20Jan%202009\).pdf](http://www.eirgrid.com/media/Reduced%20Criteria%20Generation%20Application%20Form%20(Versio%201.1%20Jan%202009).pdf)

General Modification Form

DG/TG Number	
Connection Agreement number	
Is the applicant part of a sub-group? [Yes / No]	
If Yes	
Confirm that the written and unconditional agreement of the other parties in the sub-group, per the template, is attached? [Yes / No]	

Section A: Change to Overhead Line or Underground Cable

Previously offered		
Circuit start location [station]	Circuit end location [co-ordinates]	
	Easting	Northing
Requested modification		
Cable for all of previously offered connection method? [Yes / No]		
Cable for part of previously offered connection method? [Yes / No]		
Overhead line for all of previously offered connection method? [Yes / No]		
Overhead line for part of previously offered connection method? [Yes / No]		
If partial:		
Cable Section start		
Station [if applicable] or	Co-ordinates [if applicable]	
	Easting	Northing
Cable Section end		
Station [if applicable] or	Co-ordinates [if applicable]	
	Easting	Northing
Include additional cable sections start and end if appropriate		
Map showing proposed cable route supplied? [Yes / No]		
Estimated length of additional cable [km]		

Consent

Where circuit being modified is shared then any increase in the cost of the circuit will be borne by the party requesting the modification. The modified offer will only be valid if accepted by all parties sharing.

Section B: Change in Contestability (see template A)

If Not part of a Sub-Group	
Please clearly indicate in words, the works which the applicant wishes to contest	
SLD depicting clearly the works which the applicant wishes to contest attached? [Yes / No]	
If Part of a Sub-Group	
If intending to act as Lead Developer	
Please indicate in words, the works which the applicant wishes to contest as lead Developer	
SLD depicting clearly the works which the applicant wishes to contest as Lead Developer, and the boundaries with other applicants attached? [Yes / No]	
If <u>not</u> intending to act as Lead Developer	
Please indicate in words, the works which the applicant wishes to contest	
Is a Single Line Diagram depicting clearly the works which the applicant wishes to contest attached? [Yes / No]	

Consent

Template to be completed and returned by all parties sharing the works prior to commencement of works to modify offer. In addition, the works cannot proceed on this basis until the modified connection agreement is accepted by all parties

Section C: Connection Point Relocation

	Easting	Northing
Confirm co-ordinates of Connection Point per existing offer		
State co-ordinates of proposed Connection Point		
Is the location of the turbines remaining at the same location that existing offer was based upon? [Yes / No]		
If No, please complete Capacity Relocation Section D		
If Yes		
Is a map depicting clearly the location, and revised layout of this change attached? [Yes / No]		

Section D: Capacity Relocation

Is the location of the turbines remaining at the same location that existing offer was based upon? [Yes / No]	
If No	
Is a map depicting clearly the location, and revised layout of this change attached? [Yes / No]	
Is it co-incident to another project? If merger is required please see Section E If proposed relocation conflicts with another project, then consent is required before either project progress	

Section E: Merging of two or more existing applications (see template B)

List Applications/projects to be merged as part of this modification	DG/TG Number	Project Name	MEC
Confirm new combined MEC			
State Location of proposed Connection Point for Merged Application			
State name of Legal Entity to whom modified offer is to issue			
State address of Legal Entity to whom modified offer is to issue			
Is the written and unconditional agreement of the other parties in the sub-group, per the template attached? Yes/ No			
Is a map depicting clearly the location, and revised layout of this change attached? [Yes / No]			

Section F: Splitting of capacity of an existing application/project

Confirm existing application/project to be split	DG/TG number	Project Name
Confirm MEC per existing offer, of existing application to be split [MW]		
Post Split Application/Project 1		
Proposed MEC [MW]		
Is proposed destination location co-incident with an existing application/project? Yes no?		
If Yes		
Details	DG number	Name
If No		
Is a fully completed NC5A/Assumed Data form attached for the resulting new application? [Yes / No]		
Post Split Application/Project 2		
Proposed MEC [MW]		
Is proposed destination location co-incident with an existing application/project? Yes no?		
If Yes		
Details	DG number	Name
If No		
Is a fully completed NC5A/Assumed data form attached for the resulting new application? [Yes / No]		
Include additional projects as appropriate per sections above		

Section G: Proposed Change of Connection method

Describe as completely as possible, proposed Connection Method in words	
-------------------------------------------------------------------------	--

Is a complete Single Line Diagram showing schematically, the entire proposed connection method attached?	
Is a map showing the geographical layout of the entire proposed connection method attached?	
Is a fully completed NC5A/Assumed data form attached?	

Consent

Where works being modified are shared then any increase in the cost of the circuit will be borne by the party requesting the modification. The modified offer will only be valid if accepted by all parties sharing.

Section H: Change of internal collector network

Is the internal collector network changing at the site? [Yes / No]		
If Yes		
Please include two maps <ol style="list-style-type: none"> 1. Map indicating the location, route and length of internal collector network(s) as per original application. 2. Map depicting clearly the location, route and length of all additional internal collector network(s) arising from this change attached 		
Is a schedule of the electrical details of all additional internal collector network(s) arising from this change attached? [Yes / No]		
Describe as completely as possible, proposed change to internal network in words.		

Section I: Application for a Temporary Connection

Permanent Connection Number	
Permanent MEC [MW]	
Proposed temporary connection method (in words and SLD)	
Temporary MEC applied for [MW]	

Section L – Phasing

Current MEC [MW]			
Proposed Energisation Date			
Number of phases			
MEC associated with Phase 1		Proposed energisation date Phase 1	
MEC associated with Phase 2		Proposed energisation date Phase 2	

Section M – Extension to term of Connection Agreement

Current Connection Agreement expiry Date	
Requested new expiry date	
Changes to generating plant? (Y/N)	
If Yes – updated NC5 for DSO or full form for TSO to be provided	
Any other changes? (Y/N)	

Section N Change to Longstop Dates

Current Scheduled Longstop dates	SCIDLD/SPPLD	
	SOLD/SCAELD	
New proposed Longstop Date	SCIDLD/SPPLD	
	SOLD/SCAELD	
Please set out why extension to Longstop Dates are required, and when current issue delaying progress is expected to be resolved		

Section O – Change to metering²⁰ arrangements

Number of different metering outputs required	
Provide an SLD indicating proposed location of meters ²¹	

Section P – Change to number of RTU devices

Number of different RTUs required	
Confirm where the proposed new RTUs should be installed	

Section Q – Change to bonding regime as per 09/138

See template letter C to be returned

Section R – Change to offer Validity Period

Current Offer due to expire	
Extension required until	
Please set out why extension to Offer validity period is required and, when current issue delaying progress is expected to be resolved	

Submitted by:

Applicant Name

Print Name

Date: _____

²⁰ Primarily submetering

²¹ Please note that actual metering locations cannot be agreed until a more complete design has been assessed by and discussed with the appropriate staff post offer acceptance

