

Bríd O'Donovan
Commission for Energy Regulation
The Exchange
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2nd December 2011

RE: Consultation on Modification Requests to Connection Offers – Fees and Process (the Consultation)

Dear Bríd,

Bord Gáis Energy (BG Energy) welcomes the opportunity to respond to the Consultation on Modification Requests to Connection Offers – Fees and Process (the Consultation).

BG Energy has been actively involved in drafting the IWEA's response to the Consultation and supports the IWEA position.

In summary, BG Energy considers that it is unacceptable that the new proposed connection modifications process is more expensive and protracted than the current process. The proposed charges listed in the Consultation are inordinate and unreflective of the efforts to provide a more efficient connection modifications process, particularly as it can be anticipated that minor modifications can be expected on a high number of connection offers.

When compared to past fees for modification for Bord Gáis projects the proposed fees in the Consultation seem highly inflated and will lead to cost over-recovery. Any under-recovery of costs reasonably incurred after a first review can be dealt with by amending the fees based on actual data. There should not however be any retrospective recovery of costs.

As projects are not in a position to specify the final turbine type or plant design at application stage, there should be no charge for changes such as internal network or turbine changes. Moreover, instead of assuming that all technical analysis is completed for issued offers and that the work required to process a modification is additional work, technical studies should not be completed until confirmation of the final plant design. It is unfair to be charged in full for additional technical studies when these studies may not have been completed or only minor model changes are required to redo existing studies..

A number of the fee levels associated with different modification types vary depending on whether or not there will be significant expected change to shallow works. A definition of what "significant" means is required. Bord Gáis believe that in many cases what may seem significant in terms of the level of change to a proposed connection may lead to a much reduced scope of connection works and associated technical study requirements.

Clarification is also sought on the reason for applying high fee levels associated with changes to grid connecting transformers, given that often only small changes to system models are required for these changes which do not create major incidental network impacts.

An expedited service should be made available whereby connection offer modifications that are critical for project development are dealt with promptly on a priority basis.

Please do not hesitate to contact me should you have any queries on the above.

Yours sincerely,

Julie-Anne Hannon
Regulatory Affairs – Commercial

{By email}