

I refer to the consultation paper published on 11th December 2015 in regard to the above.

An Bord Pleanála notes that the document is the first step in producing an 'Enduring Connection Policy' which will succeed the CER's present approach to authorising connection to the electricity network. It is also noted that it is intended to review the Group processing Approach (GPA) or 'gate' process as it is more widely known in addition to the non GPA approach which relates to the processing of connection offers for small renewable and low carbon generators that fulfil public interest criteria. The review covers both the area of renewables and traditional forms of generation.

Given that it is proposed that a decision paper will issue in early 2016 on the transitional arrangements, a further consultation paper on the ECP will issue in Q1/early Q2 and a draft decision paper on the ECP will issue in Q4 2016 the Board may wish to comment further as the Review progresses.

At this stage in the review the Board would wish to provide the following general comments. In particular broad support is expressed for the approach in the document which includes a suggestion that greater interaction may be required between connection policy and generator and network planning consents. The following are therefore the initial comments

- For purposes of making informed planning decisions it would assist to understand how and where any particular project 'sat' in regard to the connection policy process;
- The thrust of the document seeking to create greater certainty in regard to the nature and form of connection would be of assistance to the planning process;
- The general thrust of the document which appears to seek rationalisation of connection and best use of existing infrastructure (sections 4.4.3 & 4.4.4) would appear to represent a logical approach;
- Would support the provisions of 4.2 in regard to interconnectors but would also query whether other large PCI projects might need to be referred to and dealt with specifically
- Section 4.4.7: Board would note that legal challenges are a very significant delay in the overall planning permitting process for energy projects at this time. This includes after they have been determined by ABP. Would support the general principle of greater interaction between connection policy and generator and network planning consents
- 5.2 Transitional arrangements: It is unclear what the planning implications of these transitional arrangements might be and whether any changes foreseen under the transitional provisions may require revised planning permissions e.g where proposing increased generator capacity

It is also pointed out that there appears to be an error in table 2 having regard to the statistics as set out in the preceding text of section 4.1

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