

# Bob Gunkel Planning

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COMMENTS AND OBSERVATIONS ON

COMMISSION FOR ENERGY REGULATION

REVIEW OF CONNECTION AND GRID ACCESS POLICY:  
INITIAL THINKING AND PROPOSED TRANSITIONAL ARRANGEMENTS

REFERENCE: CER/15/284

SUBMITTED BY

BOB GUNKEL MA MIPI

February 2016

Dear Sir,

I welcome this opportunity to comment on the proposed Connection and Grid Access Policy Review, reference CER/15/284. There have been substantial changes since the publication of the last connection policy and the review will allow to take cognisance of these changes and to update the policies accordingly.

While I in general agree with most of the proposed policies, I feel that by and large they are somewhat limited in time scale and therefore do not fully consider the longer term goals and objectives, in particular on an European scale.

My comments are as follows:

**Paragraph 2.1.4: GPA Application Built Up.**

Since the closure of Gate 3 a large number of connection applications have been received by the SO. No formal grid connection decision has been take on any of these applications due to the absence of post gate 3 assessment criteria. I fully agree with the proposal to not to process these applications and to only accept new connection agreement applications from the date of the establishment of the Enduring Connection Policy (ECP). The new applications shall be assessed on the basis of a set of comprehensive and transparent criteria, rather than just the date order.

**Paragraph 3.1: Enduring Connection Policy Objectives and Underlying Principles.**

I strongly recommend that the range of principles is widened to expressly include import substitution and balance of payments. This would provide for a longer term outlook which would include the export of green energy via a system of interconnectors to the rest of Europe.

I support the policy to optimise grid development and thus minimise the need for new infrastructure. It is important for developers, prior to making a planning application, are made aware of where there is spare capacity in the network and select a site accordingly. This information needs to be published by the SO on regular, say monthly, basis.

Over the last number of years wind energy development has become increasingly controversial as demonstrated by the recent high rate of planning appeals and judicial reviews. It has been argued that conflict can be reduced if the development is carried out on a community basis with locals become stakeholders. There is a need to develop a set of relevant and transparent criteria to define this type of application. A community application is much more likely to be acceptable, thus minimising local objection. While this is strictly speaking a planning issue, I would request CER to consider this issue further with a view to giving community driven wind energy developments a preferential treatment.

**Paragraph 4.1: Renewable Targets.**

There has been a recent surge in the demand for large scale data centres, such as for Google. Not only are these planned facilities very power hungry, most of these prefer to be powered by renewable energy. This will substantially increase the demand for renewable energy and thus have a considerable impact on the renewable energy requirement in the light of the 40% RES-E target by 2020

You estimate that Gate 3 will eventually deliver a further 1700 MW out of a total contracted capacity of 3510 MW. In my opinion this figure is unduly optimistic and does not fully reflect the major planning problems such as the requirement to include the proposed grid connection in the application and the increasing delays caused by appeals and judicial reviews as currently experienced by most wind energy development proposals. The resulting delay will result in many of the contracted generators missing the important REFIT II deadline of December 2017.

In particular I wish to refer to the problem with grid connection as the detailed design of such a connection is the responsibility of the SO which are already under major pressure and simply do not have the staff required to assess and design the required connection. Furthermore, the O'Grainna judgment has resulted in de-exempting of class 26 and 27 (20 KV or less and undergrounding respectively) which will make it much more difficult to obtain planning consent for the connection. Note that this de-exemption has now been formalised by the Department by its recent publication of the Planning and Development (Amendment) Regulations 2016.

Furthermore most of the Gate 3 permissions are now more than 5 years old and consequently many of these have since lapsed. In cases that an extension of duration permission was granted under section 42 of PDA 2000 (as amended) these extensions are now also lapsing. Note that all works need to be completed before the expiry of the permission. Also under section 42 only one extension of duration permission can be granted which will cause major problems if the development is only partially completed before the expiry of the appropriate period. Moreover, extension of duration applications are less likely to be granted if the long awaited amendments to the Wind Energy Guidelines differ substantially from the current guidelines as under section 42(a)(ii)(II) permission for an extension can only be granted if the proposed development is in full compliance with any current guidelines, including guidelines that came into force subsequent to the date of the original permission. If there is an increase in the required separation distance between dwellings and turbines, as is widely expected, the original permission may not be able to meet this new criterion and the extension application will therefore be refused

Consequently most of the wind farms contracted under Gate 3 are unlikely to be constructed. As a result considerably less than the 1700 MW envisaged by CER will be installed, resulting in Ireland missing its RES-E target. I therefore fundamentally disagree with the statement in paragraph 4.1 that "RES-E may no longer be an insignificant driver of policy".

#### **Paragraph 4.2: Interconnection, Demand and Generation Forecasts.**

The capacity figures appear not to consider the impact of international interconnectors which can both import and export electricity. Given its relatively favourable wind regime, Ireland could strive to become a major exporter of green energy to Europe, thus greatly benefitting the balance of payment and assist with the security of supply. CER are urged to actively consider this longer term scenario and make explicit provision for the export potential offered by interconnectors in their capacity calculations.

#### **Paragraph 4.4.4: Demand.**

I note your comments re large demand connections such as large data centres. Many of these centres favour a green energy supply. While I agree with the objective of encouraging large demand users to make the most effective use of the existing network, this needs to be balanced against the need to provide the demand in the form of renewable energy as required by some of the large demand users such as Google.

**Paragraph 4.4.7: Planning and Consenting Considerations.**

Over the last number of years there has been a substantial increase in the rate of planning appeals and judicial reviews. As a result there is now an increased uncertainty as to which generator proposal will actually be constructed, a situation which greatly complicates the essential network planning and investment. In view of this I agree with the proposal in the discussion document to require all new applicants for a connection agreement to have a valid planning consent for both the wind farm as well as the grid connection.

This approach has, however, is experiencing major problems due to the need to include the grid connection. The design of the connection is the responsibility of the SO which are simply not able to cater for the large number of connection applications. Developers need some certainty regarding the capacity and location of the connection sub station before committing themselves to the substantial expense of making an application and the required EIS. Trying to find the required level of certainty regarding this issue will be a major challenge for all parties, including the SO.

See also my earlier comments in paragraph 4.1 relating to planning issues facing wind energy development.

**Paragraph 5.1: Release of Existing Capacity.**

I fully support the proposal to buy back unused capacity. However, using the original offer price may be a problem as anecdotal evidence would suggest that at present capacity is traded at prices which are considerably above the ones paid as the first stage payment of the connection agreement. Unless a moratorium is declared on this type of capacity trading, it will be virtually impossible to implement the proposed buy back and thereby providing the required clarity regarding the actual spare capacity on the network. As the SO are currently under major pressure to assess the large number of requests for changes in the connection agreement resulting from this capacity trading, a moratorium will free up staff to carry out their more essential duties such as assessing and designing grid connections.

**Summary:**

- A longer timescale and a more European level of approach are strongly recommended,
- Interconnectors will allow Ireland to fully utilise its natural wind resource and therefore the new policy will have to provide for the export of renewable energy to Europe,
- The additional capacity to be provided by the built out of Gate 3 is likely to be substantially less than estimated in the report,
- The recent emergence of large data centres requiring renewable energy will substantially increase the demand for renewable energy such as onshore wind,
- The proposed buying back of unused capacity at cost price is likely to be problematic and the imposition of a moratorium is recommended,
- In view of the high cost of applying for planning permission, a mutually acceptable mechanism must be found to provide certainty as to the capacity and location of the grid connection,
- CER is requested to give preferential treatment to local community driven generator proposals.

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