

## Response to CER/15/284

<b>CONSULTATION</b>	Review of Connection and Grid Access Policy: Initial Thinking & Proposed Transitional Arrangements
<b>NAME OF RESPONDENT</b>	Michael McCarthy; Services Manager Carbery Food Ingredients Ltd
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<b>TYPE OF COMPANY</b>	Food Ingredients Manufacturer
<b>INTEREST IN CONSULTATION</b>	To ensure that fair and reasonable approach is given to auto-generation opportunities in Ireland

## SECTION 3

QUESTION 1: Do you agree with the policy objective for the Enduring Connection Policy? Are there other matters the CER should consider?

ANSWER: Having read the CER review of Connection and Grid policy Carbery agrees with the policy objectives for the Enduring Connection Policy. Maximising the utilization existing infrastructure and auto-generation should be a priority in Ireland which is similar to other EU countries as the most efficient use of existing infrastructure.

QUESTION 2: Do you agree with the application of the above underlying principles to the development of Enduring Connection Policy? Are there any other principles that the CER should consider?

ANSWER: Yes and additionally cost to the end user must be a priority particularly to small and medium sized businesses. Optimal grid development should be given the highest priority which in our opinion would be modifications to existing connection agreements to facilitate auto-generation. We require a long term stable policy which will allow all interesting parties to formalise future energy strategies and investments.

QUESTION 3: What is your view on the high level processing approach outlined above? Are there other processing approaches the CER should consider?

ANSWER: We certainly support projects getting access to the network in a timely manner. We feel that the high level approach should ensure the speed delivery of genuine projects. Our past experience with grid applications for electricity from anaerobic digestion via gas engines in a site securing a renewable contract with existing MEC capacity is unfair and biased. Also speculative developers applying for a grid development for the sole purpose of

securing project approval with possibly no intention of undertaking a project must be stopped in some way in the next phase. Again auto-generation grid applications should be prioritised under the new system, secondly only project that have commenced the project development cycle should be offered grid applications.

#### SECTION 4

QUESTION 4: Do respondents agree that the CER should consider the connection of renewables as one of several drivers to be balanced in the development of an enduring connection policy?

ANSWER: As part of Ireland's commitment to RES and carbon reduction commitments, connection of renewables should be clearly defined to ensure low cost investment providing low cost renewable energy should be the priority. Our multinational customers are demanding this and far more for future sustainability

QUESTION 5: Should connection policy make explicit provision for interconnectors? If so, what issues should the CER take into consideration?

ANSWER: Interconnectors to allow Ireland to export renewable electricity should be considered, however we are unsure as to how practical this is.

QUESTION 6: Should the technologies and projects currently covered under the non-GPA process be processed under the GPA process when the new connection policy is implemented?

ANSWER: Having read the above document it seems practical that project that currently fall into the non-GPA category should be changed possibly as suggested into the GPA category. However as stated previously these modifications to connection agreements should ensure that auto-generation projects should be prioritised as they represent the most efficient use of existing grid infrastructure.

QUESTION 7: Should some categories of project be processed outside the GPA process when the new connection policy is implemented?

ANSWER: Yes auto-generation projects should be processed as a priority as these are delivering power directly to

the consumer, in parallel to the consumer's existing grid connection. In case the consumer does not consume all generated power, the excess power is usually exported to the grid.

These projects do not require new grid connections, but only modifications to the existing grid connection of the consumer to allow for parallel connection and export of excess power. Therefore, auto-generation projects represent the most efficient use of the existing electrical infrastructure (network) and should be given the highest priority.

QUESTION 8: Do respondents agree that the CER should progress the development of the Enduring Connection Policy in advance of I-SEM go-live?

ANSWER: Yes, Carbery agrees with this policy

QUESTION 9: Should connection policy facilitate a mix of generation and in particular facilitate providers of system services? Should connection policy focus on certain technology types or rely entirely on market signals?

ANSWER: The connection policy should facilitate a mix of export generation and auto-generation utilizing the technology that provides the highest carbon reduction at the lowest cost.

QUESTION 10: Should projects which make the most efficient use of the existing network be prioritised over projects driving more deep reinforcements?

ANSWER: Yes, it should be a priority to use the existing infrastructure to keep the end user cost of the network as low as possible and therefore to ease the burden of high electricity bills of local Irish businesses and households. Efficient use of existing infrastructure should be given the highest priority.

QUESTION 11: Should large demand connection which makes the most efficient use of the existing network be encouraged through the Enduring Connection Policy?

ANSWER: Yes, priority should be given to auto-generation to make the most efficient use of the existing network.

QUESTION 12: Are there any specific issues the CER should take into consideration regarding community based schemes?

ANSWER:

QUESTION 13: Should the CER include planning permission in the criteria for receiving a connection offer?

ANSWER: In some way Yes while at the same time giving small and large projects a fair chance of succeeding

QUESTION 14: Have we identified the correct policy issues? Are there policy issues which we have not accounted for?

ANSWER: An additional policy issue to be considered is the modification of existing connection agreements to facilitate auto-generation and decentralized power solutions. These should be prioritized and treated in a separate manner to ensure reduced energy cost for industry in Ireland.

QUESTION 15: Should the GPA process be retained? And should there be more frequent rounds of offer processing?

ANSWER: Yes on both counts.

QUESTION 16: Should the non-GPA approach be revised?

ANSWER: Auto-generation should be classified as non-GPA and should be processed in a timely manner. If the GPA process can be modified to accommodate this then ok, however if a project requires only a modification of an existing grid connection agreement of a demand customer, and the requested Maximum Export Capacity (MEC) is equal or less than the Maximum Import Capacity (MIC), this project should be prioritized.

## SECTION 5

QUESTION 17: Comments are requested on the above proposed transitional arrangements, specifically:

Whether these transitional measures should be implemented ahead of the development and implementation of the Enduring Connection Policy;

The timing of such arrangements (30th June 2016 for policy measure (1) and (2));

The appropriate level of increase in capacity under policy measure (2) to deliver most final customer benefit.

ANSWER:

The transitional measures should be implemented ahead of the development and implementation of the Enduring Connection Policy.