



Coillte response to CER Consultation Review of Connection and Grid Access Policy - (CER 15284)

5th February 2016

Introduction

Coillte welcomes the opportunity to comment on the CER Review of Connection and Grid Access Policy. A fair, equitable and fully functional Grid Access Policy is essential to enable renewable energy projects to be developed in line with National and European Policy. In general Coillte supports many of the principles outlined in the consultation paper and have provided further comment in our responses below.

Response to Consultation Questions

Enduring Connection Policy: Objective, Principles and Approach

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

Coillte would agree with the policy objectives set out in the consultation and, in particular, would strongly support the policy objective of supporting both national policy and consumer interest. Renewable energy is key to both national policy and consumer interest and this should be recognised when developing the Enduring Connection Policy.

Q.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?

National Policy is listed as one of the policy objectives for the Enduring Connection Policy, however, in the underlying principles outlined in the consultation there is no reference to National Policies. In particular, principles relating to the promotion of the National Policies for renewable energy should be prioritised.

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

Coillte support the move to a more open ongoing grid access regime and believe this will provide more opportunity and certainty for projects wishing to obtain grid access. Maintaining a form of group processing is a sensible approach as this allows for more efficient network planning and design.

Finally, given the current planning environment the enduring grid access policy should recognise the importance of planning when assessing projects.

Enduring Connection Policy: Key Policy Drivers to determining Appropriate Connection Criteria

Q.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?

As outlined in the consultation, the policy should consider a wide range of economic and policy drivers. However, facilitation of renewables remains as one of the key policy drivers as highlighted by both the Government White Paper and the EU 2030 Climate and Energy Goals Policy Framework.

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

When considering Interconnectors the CER should take into consideration the level to which interconnectors support or inhibit the facilitation of increased levels of renewables on to the system. The introduction of ISEM is expected to allow interconnectors to help facilitate more renewables – this needs to be closely monitored by the CER. Also, the impact of new interconnectors on “Loss of Largest Infeed” and RoCoF should be considered.

Q.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?

Coillte is of the view that a non-GPA process should be maintained when the new connection process is introduced. The non GPA process caters well for Research & Development projects and other small scale developments. However, as per the CER 09/099 decision, the suitability of different technologies for inclusion in the non GPA Process should be reviewed. In particular, the suitability of Solar PV as a non GPA technology needs to be reviewed. Any changes in this regard could be implemented in line with the 30th June 2016 date used for the interim arrangements.

Q.7 - Should some categories of project be processed outside the GPA process when the new connection policy is implemented?

Please see response to Q.6 above.

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

Yes – the development of the Enduring Connection Policy is a complex matter which will take time. Also, the Enduring Connection Policy is not in any way dependent on ISEM so it should certainly be developed in advance.

Q.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?

Coillte is of the view that Connection policy should facilitate a mix of generation and, in particular, facilitate the connection of projects which can provide significant system services. The provision of such system services are vital to enable the transition to a more sustainable energy system.

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

Compared to projects which require deep reinforcements, projects utilising existing capacity have an inherent advantage in that they will most likely be connected earlier. On this basis a developer may choose to prioritise certain projects, however, this is at their own discretion.

Once developed, the Enduring Connection Policy should not prioritise projects utilising existing capacity over those requiring deep reinforcements as to do so would impede the long term development of the network.

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

Please see response to Q.10 above.

Q.12 - Are there any specific issues the CER should take into consideration regarding community based schemes?

Coillte believe the appropriate place to promote the connection of community based schemes is through support schemes and as such should be addressed by DCENR. Such projects should not be treated any differently in the allocation of Grid Access.

Q.13 - Should the CER include planning permission in the criteria for receiving a connection offer?

In recent years planning consent for large scale projects has become a major issue. On this basis, Coillte believe that some form of planning consent/validation should be a prerequisite to receiving an offer for grid capacity. The planning component, whether Full Planning Permission or a validated Planning Application, should be a first order criterion for assessing grid applications.

Coillte are strongly of the opinion that second order criteria should include the original date of grid application. In some instances grid applications were submitted eight or nine years ago at which time there was never any tie to planning and such applications were recorded in grid application date order.

Using the approach of a planning based first order criterion and grid application date as a second order criterion, will ensure only valid projects are assessed, while also treating the current queue in a fair and transparent manner.

Q.14 - Have we identified the correct policy issues? Are there policy issues which we have not accounted for?

The consultation identifies the main issues and in particular the very important issue of planning is identified. Further to this and to satisfy the requirements of O’Grianna, Coillte would highlight the need for the grid and planning processes to work in parallel. To allow developers to cover their grid connection in their overall planning application Coillte would support the IWEA recommendation to allow developers to request early feasibility studies from the system operators to assess possible grid connections.

The issue of shared connection agreements needs to be examined as greater flexibility is required in this regard to allow opportunities in the following areas to be progressed:

- Extensions to existing windfarms
- Co-location of solar on existing or future windfarms
- Integration of onsite storage technologies on windfarm sites

As part of the development of the enduring regime, the process for the allocation of capacity should be reviewed. In particular the assumptions used in the ITC program should be reassessed as well as the requirement to design for 100% firm capacity at all times. Further industry engagement should be sought on this subject with the overall aim of maximising the capacity which can be made available.

Q.15 - Should the GPA process be retained? And should there be more frequent rounds of offer processing? Should the non-GPA approach be revised?

Please see response to Q.6 above.

Transitional Arrangements

Q.16 – Should these transitional measures be implemented ahead of the development and implementation of the Enduring Connection Policy?

Yes – the development and implementation of the Enduring Connection Policy will take some time and the transitional measures, if introduced fairly, should be introduced in advance of that.

Q.17 – What should be the timing of such arrangements (30th June 2016 for policy measure (1) and (2))?

Coillte are of the view that the date of 31st December 2016 would seem more appropriate for the transitional arrangements. This should allow sufficient time for generators to assess their options with regards to these proposals and, in the case of the increased MEC proposal, apply for modification.

Q.18 – What would be the appropriate level of increase in capacity under policy measure (2) to deliver most final customer benefit?

Coillte would support the proposed 10% capacity increase but only if this is done in a fair and transparent manner and available to all generators. To ensure this the following changes should be made to the current proposal:

- Open to all projects, both firm and non-firm.
- Available for transmission and distribution connected projects.
- The projects should be able to have additional shallow assets constructed.