Subject:	Response to CER 15/284	**Doc. No.:**	582-AC-0002
Prepared by:	Ann Fingleton	**Date:**	05.02.2013
Reviewed by:	John Fingleton	**Pages:**	2

1.0 Introduction

Fingleton White was set up in 1981 to service the energy sector in Ireland. Since then it has been involved in many significant projects in the development of power generation, oil and natural gas infrastructure.

2.0 Response

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

FW agrees with the policy objectives, in particular efficient use of scarce network capacity. By giving embedded generation the highest priority, efficient use of existing infrastructure is achieved. The prioritisation of embedded generation (auto-generation) is line with other EU countries seeking to achieve optimal grid development.

3.1 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?

FW agrees with the underlying principles. We believe that optimal grid development should be given the highest priority. Prioritisation should be given to facilitate embedded generation.

3.2 Question 1: What is your view on the high level processing approach outlined above? Are there other processing approaches the CER should consider?

Access to the grid in a timely manner is a key consideration for the viability of genuine projects. The bar should be high to qualify for a connection offer. The past experience with grid applications for wind generation which resulted in a large number of speculative developers applying for a grid development for the sole purpose of securing a “number in the Q” and then reselling to a genuine investor should be disincentivised.

Consideration should be given to scheduled payments such as 20% within three months and 50% within twelve months to ensure access is given to projects with a high probability of completing.

4.3 Question 1: 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?

Applications for new connections and modifications to existing connection agreements for embedded generation should be processed under the non-GPA process as they represent the most efficient use of existing grid infrastructure. Consideration should be given to prioritising projects where for example the MEC:MIC ratio is less than 2:1.

Based on the recent number of applications for new solar connections and the expected growth in this area consideration should be given to new applications for solar connections being processed under the GPA process.

4.3 Question 2: Should some categories of project be processed outside the GPA process when the new connection policy is implemented?

Yes. Modifications to existing connection agreements and applications for new connections for embedded generation where the MEC:MIC ratio 2:1 or less, should be processed under the non-GPA process as they represent the most efficient use of existing grid infrastructure.

Embedded generation projects are delivering power directly to the consumer. In some cases the consumer does not consume all generated power, the excess power can be exported to the grid. By using a classification for example of MEC:MIC ratio of 2:1 or less, projects that are being built to meet the direct needs of the host site are prioritised. With the growth in standby generation, it is possible a site will have a number of generation sources and at low demand may have a significant amount of capacity for export there are plenty of sites who will have a MEC > MIC. The suggested ratio will allow for projects that are integral to meeting the sites needs efficient and timely access to the grid.

Auto-generation and decentralised power is a major trend in other European countries to ensure most efficient use of existing network and delivering the lowest cost power to end users.

A recent concern has been that projects processed under the non-GPA process can have a cumulative effect on the network especially since they are often clustered around certain points on the network. This issue is unlikely to arise with embedded generation projects. Embedded generation projects are located on site of large demand customers or in the direct vicinity of the site.

4.4.2 Question 1: 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?

The connection policy should facilitate a mix of export generation and auto-generation.

4.4.3 Question 1: Should projects which make the most efficient use of the existing network be prioritised over projects driving more deep reinforcements?

Yes, efficient use of existing infrastructure is required to ensure the end user cost is kept as low as possible. Efficient use of existing infrastructure should be given the highest priority.

Specifically, embedded generation projects should be prioritised ensuring the most efficient use of the existing network infrastructure. These projects deliver power directly to the consumer, mostly large demand customers. In case the consumer does not consume all generated power, the excess power is usually exported to the grid. In many cases, embedded generation projects do not require new grid connections, but only modifications to the existing grid connection.

4.4.4 Question 1 Should large demand connection which make the most efficient use of the existing network be encouraged through the Enduring Connection Policy?

Yes, priority should be given to embedded generation to make the most efficient use of the existing network.