

The Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

4th February 2016

IFA submission to CER review of connection and grid access policy

Introduction

This review of connection and grid access policy is timely. The outputs of the review will shape future renewable policy and act as an important conduit to the delivery of the national energy strategy, as set out in *Ireland's Transition to a Low Carbon Energy Future 2015-2030* (also known as the Energy White Paper) policy document.

Renewable energy in Ireland is at a crossroads. Almost 50% of the country's mandatory targets set by the EU remain to be delivered and there are only four years left to achieve these targets. If Ireland is serious about delivering its renewable commitments and avoiding significant non-compliance fines, the future must look very different to the present.

Opposition to renewables continues to grow due to a combination of inadequate consultation and inappropriate scale of the developments (particularly wind farms) imposed on rural areas, as well as a lack of community participation in projects.

Community participation is a central theme of the Energy White Paper, with several references in the document regarding "**supporting community participation** in renewable energy", "**facilitating access to the national grid** for designated renewable electricity projects" and ensuring "that **grid connection policy** will have due regard to current and future renewable energy policy, including in relation to **community renewable energy projects**; this policy, will be defined using criteria such as scheme size and degree of community ownership". Against this background it is essential that the CER, when deciding future connection and grid access policy is mindful of its remit to take account of national policy.

Measures to foster community participation in renewable energy production

Unlike many other European countries such as the United Kingdom¹ and Denmark,² Ireland has to-date not put in place the necessary policy framework to support community participation in renewable energy. This review presents an opportunity to refocus the delivery of renewable energy in line with national policy.

¹ Department of Energy & Climate Change (2014) *Community Energy Strategy: People Powering Change*

² Ministry of Climate, Energy and Building (2013) *Energy policy report 2013*

The following specific measure is proposed to the CER as part of this consultation:

- Grid exemption at each node should be granted to all projects that have at least 25% community participation.

In addition the following measures are proposed:

- A generation feed-in tariff premium of 2.5c/kWh for projects that have community participation.
- Ring-fencing of at least 25% of the generation capacity supported in any new renewable energy scheme for projects that have community participation.
- At least 1% of the annual turnover from community projects must be returned to communities for rural regeneration and social projects.

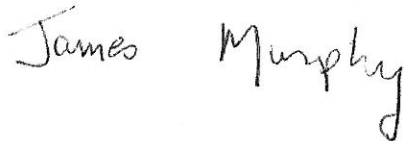
Planning and Consenting

The Association supports the proposition put forward by the CER to include planning permission in the criteria for receiving a connection offer. This will deter speculative approaches by development companies to landowners and provide certainty to landowners and local communities regarding project proposals in their areas.

Conclusion

IFA appreciates the opportunity to make this submission and would welcome the opportunity to engage further as the consultation progresses.

Yours sincerely,

A handwritten signature in black ink that reads "James Murphy". The signature is written in a cursive style with a large, looped 'M'.

James Murphy
Renewables Chairman