

Tipperary Energy Agency  
Erasmus Smith House  
Church St,  
Cahir  
Co. Tipperary

Commission for Energy Regulation  
Belgarde Square,  
Tallaght D24  
28/01/16

Re: CER/15/284 Grid Access Policy

Dear {CER}

The Tipperary Energy Agency is a non profit public good energy consultancy. The TEA have supported the development of Ireland's only community energy project, and continues to work with a number of community groups that plan to implement renewable electricity projects. The TEA also supports the Tipperary Planning section on the development plans and development management and treatment of energy projects. In addition to this, the Tipperary Energy Agency supported the National Economic and social council on the development of their recent paper on the societal acceptance of renewable energy.

The Tipperary Energy Agency welcomes the consultation on the grid access Ref CER/15/284. It is clear that a root and branch review of the policy is required. A number of significant issues are hampering the fair transition to a low carbon sustainable electricity system. Notably:

- Speculative grid connection applications over the last 15 years are being sold at a profit by developers. This profit is clearly unjust and un-equitable.
- The lack of ability to gain access to the grid is significantly decreasing the ability of communities and citizens to develop Community owned developments, that in turn are increasing resistance to the development of renewable energy infrastructure.
- The delay in the grid connection process is limiting the ability of existing projects to expand small additional capacities without justification, where the costs would be negligible to either the developer or the state.

It is the position of the Tipperary Energy Agency that the legislative context of this consultation should include the recently published White paper on energy policy in Ireland. The Tipperary Energy Agency would like to reference to action 100 that seeks to encourage community and citizen participation of the energy transition with access to the national grid.

### **Question 3.1 Enduring Connection Policy Objective and Underlying Principles.**

The Tipperary energy Agency feels strongly that the CER should, as one of the core principles, ensure that the decarbonisation of our energy infrastructure should be a core principle. Indeed the recent government White paper on energy calls for *“A radical transformation of Ireland’s energy system is required to meet climate policy objectives. Our vision of a low carbon energy system means that greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100.”* In addition to this white paper, Ireland has signed a commitment to reduce its carbon output "as soon as possible" and to do their best to keep global warming "to well below 2 degrees C". If these policies are accepted we should see electrification of heat and transport and a grid CO<sub>2</sub> emissions of 45-180g CO<sub>2</sub> per kWh by 2050 (based on 900g/ kWh in 1990 & 80-95% reduction.) To that end the grid related CO<sub>2</sub> emissions must decrease by 2.7% - 6% per annum based on the above figures. It is therefore the position of the Tipperary Energy agency that the Enduring principle of the Grid access approach should include: ***“Facilitate the decarbonisation of Ireland’s energy systems primarily via the electricity system in line with our national, European and international commitments”.***

### **Question 3.2 High Level Approaches**

The Tipperary Energy Agency considers that a clear objective of decarbonisation should be included in any approach. Generators that rely on fossil fuels should only be allowed on to the network if their addition facilitates increased renewables, otherwise Ireland will be paying for plant that will be stranded if we meet our own stated policy objectives. The Recent white paper devotes an entire chapter to the decarbonisation of our energy system. For this not to be a primary, i.e. High level approach to the development of our energy infrastructure would be contrary to stated government policy.

The Tipperary Energy Agency also considers that the objective of the white paper (which it devotes an entire chapter) that seeks to encourage citizen ownership and engagement must be considered as part of the connection process. Applicants where there is only private ownership should require demonstrated public good for access to the grid.

The state’s energy system should be for the benefit of its citizens. A third high level objective, with specific guidance should be considered that underlines CER099 – the overwhelming public good. It is proposed in this submission that all applicants should be measured versus public good and these criteria be included in the ranking of grid connections. Projects that decrease energy related CO<sub>2</sub> emissions, projects that are citizen owned, projects of an R&D nature or projects that the economic benefits go to public good should be considered ahead of others that do not score so beneficially.

**Question 4.1.**

The Tipperary Energy Agency agrees that the CER needs to be cognisant of a wide range of economic factors, however, despite their not being a further target in addition to the 27% RES EU2030, the CER must utilise long term policies to direct the policy objectives. In addition to this, on a pro rata basis the 2020 targets of 40% RES- E; 12% RES-H and 10% REST T being 16% overall renewable energy in Ireland by 2020, a 27% RES target for 2030 would equate to a 67% RES-E target by 2030, therefore this should be a minimum objective. The CER must therefore include the white paper objectives that outlines the overall 2050 vision as part of it's core objectives. Thus the decarbonisation should be of primary importance in line with security of supply.

**Question 4.3 GPA and Non GPA.**

The Tipperary Energy Agency considers the new connection process should take cognisance of the two noted points in question 3.2 and therefore have no requirement for non-GPA approach, scoring all connections in line with the relevant public policy objectives.

**Question 4.4.1**

Yes. Any further delay in reforming the grid processing approach is not beneficial to Ireland.

**Question 4.4.2**

The system services required should be one element of the assessment. However it should not override other key elements.

**Question 4.4.3**

Yes. Projects that facilitate generation and system services utilising existing networks should be prioritised. This, however, may slow the connections of large scale renewables in favour of smaller distributed connections. This needs to be balanced with the objectives of the overall energy policy in Ireland.

#### **Question 4.4.6**

The CER, taking cognisance of non-discriminatory nature, should establish criteria that clearly define “public good” as part of the connection process. While community ownership outright maybe seen by private developers as discriminating against them, The local economic benefit of widespread distribution of the economic returns of an energy generation project would be also seen as a public good, which the CER and the State in previous publications has noted of being of significant benefit. The National Economic and social council published a detailed study on this topic<sup>1</sup> and indeed should be consulted on this topic.

However, the Tipperary Energy Agency believe that all energy projects should be developed with the support and ownership of the community that they operate in. Therefore The Tipperary Energy Agency suggest that a number of policy objectives could be met by:

- Including a specific percentage target for 100% community owned developments.
- Include a specific percentage target for co-developed projects (private and community).
- Facilitate access through mandated support structures by the SO’s to support the development of suitable projects through technical support and / or reduced feasibility fees. (The TEA believe that community projects should pay the same price for the final connection charges, but it should be structured in the way that an entity that wishes to develop one project should not require the cash flow from previous projects to support an up-front charging regime as is currently in operation.)
- The grid access process should discriminate against projects that are not of societal benefit.

#### **Question 4.4.7**

Planning permission should be required to seek a grid connection offer in principle. It would virtually eliminate the speculation that is currently rife in Ireland. However, post O’Grianna & Ors v An Bord Pleanala, applicants will require planning permission for both project and grid connection as one project, therefore there will be a need for the CER to take cognisance of this requirement in forming any grid access.

- The TEA would propose that the SO’s indicate a likely connection method based on feasibility planning. This would not be a grid connection offer, but would assist the developer in making a planning application only and would form part of the planning process. The SO would be required to withhold that capacity for a period of time “use it or lose it” that could include:
  - o Application for planning permission within a timely manner (e.g. <6months).
  - o Planning permission would need to be secured within a set period. E.g. If the planning permission is denied and not appealed to An Bord Pleanala then the SO capacity offer removed.
  - o If the planning permission is denied from An Bord Pleanala, the applicant should either lose capacity or have a short period in which to continue the planning process for the same or substantially similar project.

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<sup>1</sup> [http://files.nesc.ie/nesc\\_reports/en/139\\_Wind\\_Energy\\_Main\\_Report.pdf](http://files.nesc.ie/nesc_reports/en/139_Wind_Energy_Main_Report.pdf)

The Tipperary Energy Agency welcomes this consultation. With each passing month and year Ireland continues to feel stronger and stronger effects of climate change. In addition the scientific community (and the IPCC) continue to publish more and more alarming predictions of the impact that our addiction to fossil fuels are having on our world. While the legislative agenda has not as of yet detailed the exact % of grid renewable electricity by 2030 (as part of our overall 27% Renewable energy target), it is clear from the recent white paper and the Paris declaration that policy is dictating a move from fossil fuels to renewable energy. The Tipperary Energy Agency strongly urges the CER to live up to it's legislative responsibility but also the moral responsibility to Ireland and it's Citizens to use each policy position and rule to support the transition to a low carbon economy.

The Tipperary Energy Agency would welcome any additional requests for information.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Paul Kenny". The signature is written in a cursive, flowing style with a large, sweeping flourish at the end.

Paul Kenny B.E. MIEI C.Eng

Chief executive Officer,

Tipperary Energy Agency,