



SIGA-HYDRO

## SIGA Hydro response to Enduring Connection Policy

### Stage 1 (ECP-1)

### Proposed Decision CRU/17/309

SIGA Hydro is developing a 360MW pumped storage plant at Silvermines in County Tipperary. The plant will lead to increased renewable generation, reduced emissions, greater wholesale market competition and end-user cost reductions for electricity customers.

SIGA Hydro recognises the difficulties faced by the Commission and by the Transmission System Operator in prioritising connection offers in view of the large volume of applications. However, SIGA Hydro is concerned at some of the measures suggested in the proposed Policy and the DS3 Proposed Prioritisation Ruleset annex. In particular, we are concerned that the proposals favour a particular class of service providers – namely batteries and flywheels – and discriminate against other types of providers, such as pumped storage, which may provide greater benefit to electricity customers. While batteries and flywheels can provide fast reserves, they will increase customer costs. Pumped storage, on the other hand, can provide fast reserves, other DS3 services, increased competition and reduced customer costs while also increasing renewable penetration. We suggest that policy should be driven by a holistic approach which focusses on end-user costs rather than seeking the least-cost provider of each service.

We are also concerned at the proposal that DS3 connection offers should be capped at 100MW per individual project. Our project (like Turlough Hill) will be capable of delivering its entire capacity as fast frequency response (when pumping) and greatly in excess of 100MW of other DS3 services.

While we recognise that the current proposed decision to include a planning permission requirement for ECP-1 is reasonable given the number of projects with planning, we suggest that future group applications should not require planning. The O’Grianna ruling sets a clear precedent for the need for a more coordinated approach between the planning and connection processes. The ruling makes clear the need to include the full details of the connection point and method in the planning application and associated impact assessments. This means that new planning



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applications are unlikely to be successful unless the connection point is agreed prior to the submission of the planning application.

We also note that the proposed decision makes specific reference to the CRU's direction to the TSO to commence processing any electricity interconnector applications for connection to the Irish system that have received the Project of Common Interest (PCI) status (CRU/17/299). PCIs in energy are major infrastructure facilities that connect energy networks across Europe and boost the use of renewables ensuring that secure, clean and affordable energy reaches all citizens. Storage projects are eligible for PCI status as they are recognised as projects that enable greater use of renewable energy by reducing curtailment and providing system services. We suggest that the decision should make specific reference to prioritising connection application processing for both transmission and storage projects with PCI status.

### **Summary**

SIGA Hydro urges the CRO to include the following in the final decision;

1. Planning should not be a requirement for processing batches after the 2018 batch
2. The DS3 caps of 400MW for all the DS3-prioritised applicants and 100MW for individual DS3 applicants should be removed for batches after the 2018 batch
3. Specific reference to prioritising connection application processing for both transmission and storage projects with PCI status should be included