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**Submission to
Commission for Regulation of Utilities**

on

Enduring Connection Policy Stage 1 (ECP-1) Proposed Decision
CRU/17/309, 2nd November 2017

Non-confidential

by email to: electricityconnectionpolicy@cru.ie

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1. Introduction

The IWFA welcomes the opportunity to respond to the CRU's proposed decision on ECP-1. It has now been over 10 years since the last windfarm application was included in Gate 3. The IWFA welcomes the CRU's proposals to have regular batches of applications processed, possibly even a continuous process, which might better facilitate synchronisation with the proposed regular support tenders. Moving towards a planning led system is something that IWFA has sought for many years, so this is also welcomed, but as IWFA has pointed out on many occasions over the years, this more logical approach can only work with more efficient and, crucially, timely delivery of grid connections (well within planning horizons), not just connection offers, with penalties for failure to deliver (compensation or deemed access). In our last response to the CRU's consultation on Connection and Grid Access Policy, the IWFA outlined our concerns and proposals for the timely and cost-effective delivery of grid connections. We request the CRU continues to consider these proposals in the development of ECP-1 and wider connection policy:

*".., IWFA believes some overriding principles on access are required:
- assuming grid access delivery well within project planning horizon, planning to be a condition of access (as proposed by CER);
- indeed, planning to create a requirement for either a connection offer or a refusal on stated grounds, as per the Electricity Act;
- it is for the market and the Government (via its support scheme), and not really for the TSO or regulators, to decide on the level of demand for access, whereas it is for the TSO (as regulated) to decide if access must be refused;
- group processing to be maintained insofar as planning law permits (taking account of the implications of the O'Grianna case....¹"*

This IWFA response is focused on the proposals in the CRU's proposed decision on ECP-1. The planning led approach does have the immediate effect of reducing the 36GW connection application queue to approximately 3-4GW of generators with planning consents. The planning led approach should also substantially remove the need for or the possibility of the hoarding of grid capacity. However, as we move to an auction based renewable support scheme, it is even more beneficial to the consumer to ensure that a large number of renewable projects have grid capacity and can compete in the support auctions. It is therefore critical that ECP-1 is appropriately sized to ensure that a sufficient number of renewable energy projects with a capacity well beyond that offered in support can compete in the future RESS auctions. The IWFA proposes that the ECP-1 batch is increased to over 1,000MW for new generator connections.

The IWFA also wishes to raise in our response some major concerns with the CRU's proposals for ECP-1. The main concerns include:

- Renewables must have priority access into ECP-1,
- Within that, the criteria for inclusion in ECP-1 need to clearly reflect the CRU's stated objective of enabling genuine 'build ready' renewable projects with planning to proceed to construction,
- Capacity relocation for existing contracted generation should be maintained,
- The massive increase in ESB Networks application fees are completely unacceptable, and,

¹ Pages 2 & 3, IWFA Submission (dated 5th Feb 2016) to Commission for Energy Regulation on "Review of Connection and Grid Access Policy: Initial Thinking & Proposed Transitional Arrangements" CER/15/284, 11th December 2015

- Removing the consumer underwriting of shared asset costs would make group-processing unviable.

These concerns as well as detailed comments and proposals on all aspects of the CRU's proposed decision are included in the sections below.

2. Priority Access for Renewables

The consultation proposes that ECP-1 is open to all projects regardless of technology. IWFA strongly propose that renewable generation should have priority access in ECP-1. Based on the proposed rule-set and from reviewing the planning permissions in place for new fossil fuelled generators, it is possible that the entire capacity in ECP-1 for generators could be allocated to fossil fuel generation.

The legal context listed in the consultation does state that the CRU will have regard to the use of renewable energy but does not reference the need to comply with the EU RES Directives, nor its updated transposition instrument (SI 2014/483). Included in Article 16.2(b) of the 2009 Renewables Directive is the requirement for states to provide for priority or guaranteed access for renewables:

"16.2.

Subject to requirements relating to the maintenance of the reliability and safety of the grid, based on transparent and non-discriminatory criteria defined by the competent national authorities:

(a) ...

(b) Member States shall also provide for either priority access or guaranteed access to the grid-system of electricity produced from renewable energy sources;²"

Ireland also has binding 2020 renewable targets. EU 2030 targets are currently being negotiated. To achieve the 2020 and 2030 targets, further renewable generators will need connection offers. Allocating ECP-1 capacity to fossil fuelled generators would be a regressive policy at a time when Ireland has substantial challenges in meeting renewable targets and with adequate fossil-fuelled generation available, has no justification under the preamble of Article 16.2 for not granting that priority access, at least in ECP-1.

3. Batch Size

The ECP-1 batch is proposed to be 1,000MW for all generation technologies. Of that, 400MW has been allocated to DS3 technologies. Reviewing the onshore renewable projects with planning permission and no grid capacity (not contracted, live or processing), there is in excess of 1GW of projects. There is also a number of large offshore windfarms with existing foreshore leases. Considering it has been over 10 years since a windfarm could have its application for a grid connection processed, and the proposed ECP-1 batch is going to be so over-subscribed, the IWFA would strongly recommend that the batch size is increased. IWFA would find it completely unacceptable that ECP-1 is not designed to provide new capacity to onshore wind, the most viable and lowest cost renewable in Ireland.

² Article 16, Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources, OJ L140/16, 5/6/2009

The CRU and System Operators have based the batch size of 1,000MW on the 967MW of Gate 3 wind capacity that did not progress their connection agreements. They propose that ECP-1 can be accommodated without significant system reinforcement if the size of the batch is in line with the capacity released under Gate 3. It is also noted that an extra 300-400MW of contracted Gate 3 OCGT grid capacity was also released in 2017. Considering the capacity factor of the technologies included in ECP-1, IWFA strongly request that the batch sized for new generation is increased above 600MW, potentially to approximately 1,500MW if the new capacity is to be equivalent to the released Gate 3 capacity.

EirGrid completes analysis based on generation portfolios, and the actual capacity factor of individual generators does impact on system analysis. The 967MW of released Gate 3 capacity was onshore and offshore wind generation with assumed capacity factors ranging from 30-40%. Comparing this Gate 3 capacity with the likely ECP-1 generators and DS3 projects is somewhat comparing 'apples with oranges'. The ECP-1 batch will include 400MW of DS3 technologies. Based on recent applications submitted, this appears likely to be mainly if not all from power batteries, whose storage capacity will be approximately ½ hour per MW. As it is storage technology and the round-trip efficiency is less than 100% (meaning its demand is higher than its output), it could be argued that it will not have an impact on transmission system capacity for generation. However, to be prudent, for our analysis we have assumed a 0.5% capacity factor. We have also assumed that the available generator capacity is made up from an equal combination of wind (31.5% capacity factor) and solar (11% capacity factor) generation. Based on these factors, the 967MW of Gate 3 is equivalent to 400MW of batteries, 720MW of wind generation and 720MW of solar generation. As mentioned above this does not include the 300-400MW of Gate 3 OCGTs. Therefore, a more direct comparison of the 967MW of Gate 3 wind capacity is at least 1,840MW of ECP-1 capacity.

The consultation also proposes that ECP-1 will be capped at 50 applications. It is likely that 10-20 of these applications will be prioritised for DS3 projects leaving only 30-40 applications for generator connections. Considering the number of relatively small projects with planning, including small solar parks and single wind turbines, the application threshold could be exceeded before we get anywhere near the capacity threshold. IWFA completely disagrees with the System Operators suggestion to limit ECP-1 to 50 applications. IWFA believe that the limit should be in excess of 100. The evidence that it should be over 100 includes:

- In 2016 ESB Networks processed over 100 new non-GPA connection offers. This was in parallel with the Gate 3 modifications,
- Gate 2 included 121 applications and was similar in batch size,
- There are an increasing number of small and medium sized generators wanting to connect,
- In the period 2010-2016, NIE processed more than 1,200 small and medium-sized connection applications, which is approximately 200 per year.

Although System Operator resources should be a consideration, that should not be dictating the size of ECP-1 in terms of either MW or number of applications. The System Operators, who monopolise the supply of these services, need to adequately resource themselves for the changing requirements as Ireland transitions to a low carbon industry, and that resourcing needs to be approved by CRU.

The consultation is also proposing to round down rather than up when determining the last projects to be included in the batch. IWFA believe that rounding up should be used, as this would ensure that all capacity is allocated. It is highly likely that not all ECP-1 connection offers will be accepted, so rounding up would partly compensate for some drop-off at the acceptance stage.

IWFA suggests an application size limit of 100MW for ECP-1, consistent with reducing the need for significant grid reinforcements and also to ensure that the limited capacity in ECP-1 is not allocated to a small number of large projects. There is no clear evidence that there are any large 'build ready' projects that can be constructed in a timely manner to contribute to 2020 targets. Large projects can be facilitated later in the ECP when there has been further consideration of the update and follow on to Grid25.

4. Use of Planning Expiry as Criteria

The consultation is proposing to prioritise projects based on planning expiry date if ECP-1 is oversubscribed with generator applications that meet the planning permission requirements. IWFA strongly believe that it should be based on planning granted rather than planning expiry date.

Projects can receive planning for varying periods - 5 and 10 years are normal. Planning extensions can also be obtained for varying periods. A renewable project that received a 10-year planning in 2014 would be disadvantaged compared with a project that received a 5-year planning in 2017. It has also been 10 years since wind projects have been able to have their applications for a grid connection processed. IWFA strongly believe that the use of planning expiry is grossly unfair and open to gaming.

It has been speculated that planning permission would be a requirement for grid connection for a number of years, but the legitimate expectation was that it would be based on planning received rather than a more arbitrary date like planning expiry. The use of planning received would also be simpler to implement and less open to challenge than planning expiry.

5. Planning Requirements

The IWFA welcomes the general principle that planning permission should be a requirement for the generator facility before it can apply for a grid connection. However, as outlined earlier, the delivery of grid connections in a timely manner remains a major concern for IWFA.

Industry had envisaged that introducing planning permission as a criterion would simply be clear evidence that a project had reached a relatively advanced stage in development and demonstrated project commitment. In the proposed decision it appears that the proposals go substantially further and directly link all aspects of the planning permission to grid connection agreement. IWFA concerns are listed in more detail below:

- It is proposed that developers cannot seek significant material changes to planning permissions, for example technology size changes. It is normal for developers to continue to optimise projects through the development process. There may also be cases where planning consent amendments or new planning consents are required to account for emerging issues such as updated EIA requirements, connection offers and System Operator requirements, or following

detail site investigations and detailed design. IWFA can see the logic of some such restriction applying to ECP-1, to support the idea of enabling genuine 'build ready' projects, but does not see this as a restriction that can be applied in ECP going forward.

If such a requirement was to remain for ECP-1, there would have to be a proper definition of 'significant material changes' included in the final direction.

- It is proposed that projects with planning permission but that have ongoing judicial reviews will not be considered for ECP-1, and following the logic of the previous point, this seems correct, but only for ECP-1. The proposed rule to exclude them could have the unintended consequences of promoting parties to judicially review the planning permission of renewable projects. A way to resolve this issue is to only exclude projects that had already been judicially reviewed before the date of issue of this proposed decision (or closure of this consultation).
- It is proposed that solicitors should certify the section on planning permission in applications forms. Solicitors are actively involved in the land leases for generation projects so it is appropriate for them to certify that the developers have land agreements in place. Solicitors are not generally actively involved in planning consents for renewable projects. Requiring solicitors to certify the planning section of application forms will add unnecessary time and costs to submitting applications. IWFA cannot understand why the System Operators cannot review the planning consenting documents provided. This is the case when the DCCAE are reviewing REFIT submission or NIE reviewing connection applications in Northern Ireland.

6. Planning cut-off date

IWFA are suggesting that priority should be given based on date order of receiving a grant of planning rather than planning expiry. We therefore do not see the need for a cut-off date for planning permission to be considered under ECP-1. All projects with planning should be eligible to apply for ECP-1, but the projects with the earlier planning granted would be given priority.

7. Capacity Relocation

The CRU has directed the System Operators from the 2nd of November to suspend processing any new modifications to relocate grid connection capacity and in the consultation, they are proposing to completely stop relocation for all contracted generation. The IWFA strongly oppose the removal of the relocation policy from the 2nd of November, a decision made without any consultation with industry. The IWFA believe that existing contracted generators should continue to have the opportunity to relocate capacity under existing COPP rules. The developers would have had a legitimate expectation that any changes to connection policy would have only been made after consultation with industry, as has been the case heretofore.

However, the IWFA do understand that relocation rules are no longer required with the new ECP-1 policy as the developer would have needed planning permission to apply for the grid capacity. Further clarity is required on how the connection point can be relocated if required. For example, it may be necessary to move the substation

(connection point) within the windfarm for reasons such as ground conditions. 100m would not be sufficient for a change of the connection point.

8. Application Fees

The CRU has proposed mammoth increases in application fees for the grid connection process, particularly for small and medium sized generators. An analysis of the proposed changes in application fees is included in Appendix A. Increases in fees up to c. 2,000% are proposed. For windfarms up to 20MW, application fee increases range from 148%-2,074%. IWFA finds this level of fee increase completely unjustified and unacceptable.

Included in the analysis in Appendix A is a comparison of the ESB Networks' application fees with NIE's application fees. NIE fees are broadly similar to existing ESB Networks fees. A 4 MW windfarm would have an ESB Networks' application fee of €8,841 and a NIE fee of £8,488. In Britain it is noted that DNOs do not charge for processing generator connection applications.

Government policy is clearly encouraging community renewables. The only projects that communities will practically be able to develop are small and medium size generators. IWFA members are generally entrepreneurs developing renewables in their communities. Increasing application fees to the level proposed would be a major barrier to entry for small and medium projects. IWFA strongly propose that the CRU revert to the application fee levels that ESB Networks charged for Gate 3 and in the Non-GPA process.

In Britain and in Northern Ireland the DNOs also have a more flexible approach when processing connection applications, particularly for small and medium sized generation. During the offer process, if the connection costs appear excessive the DNO will contact the developer and allow the developer to withdraw the application and receive a rebate of some of the application fee. The DNOs also work with the developer to identify an MEC level than could reduce the connection cost to an acceptable level. The above examples demonstrate a customer-focused approach by DNOs to grid connections. It also stops DNOs having to complete and issue connection offers that are clearly unviable and take up valuable DNO resources.

In Britain where there are no application fees, the DNOs are obviously motivated to have an efficient connection process and to provide developers with the necessary information on the viability of their grid connection. This includes system information for developers to complete their own analyses, feasibility studies, pre-application discussions and flexible connection offer processes. In contrast, in ECP-1 it is proposed to have extremely high application fees. ESB Networks also provide only limited system information and there are no opportunities for informal discussions with ESB Networks before applications are submitted. This is not a customer-led approach and results in a costly process for developers and an inefficient process for ESB Networks and EirGrid. It is recommended that such a flexible approach is considered by ESB Networks and the CRU.

9. Treatment of Existing Application Fees

Since Gate 3 closed, developers have been applying for grid connections. EirGrid have always received a €7,000 (incl. VAT) fee when accepting connection applications. ESB Networks introduced this fee in approximately 2009. As detailed in the consultation, IWFA submission on ECP-1 proposed decision, 15th Dec 2017

there has been 36GW of applications from a combination of renewable and conventional generators. Developers submitted these connection applications at early stages in project development, as there was no direction from the CRU on the eligibility criteria for future gates/batches. For Gate 3, the primary eligibility criterion for inclusion was application date. During the consultation on Gate 3, there were proposals in the CRU's proposed direction to provide eligibility criteria for future Gates, but the CRU decided not to include criteria in the final direction.

ECP-1 is now clearly moving towards a planning-led approach. It appears from the consultation that the 36GW of applications will be kept 'on file'. With the new planning led approach, it is likely that the majority of these applications will not be processed. We have estimated that a total of €3.25m (excluding VAT) has been collected by the System Operators over the past 10-year period. As there is going to be a material change in the connection offer process, IWFA strongly requests that developers are given the option to withdraw their application and receive back their initial application fee. It is noted that in Northern Ireland, NIE are currently returning a large number of connection applications with the full application fee. To minimise the administration for the System Operators it may be appropriate that the onus is on developers to request the application is withdrawn and to provide the necessary information for rebating the application fee. A simple full rebate would be much easier to administer than trying to figure out costs incurred, in order to refund less than the total amount - the cost of that analysis would be completely counter-productive and tie up valuable SO resources.

The consultation also proposes that all new ECP-1 applications must submit a €7,000 initial fee with the application. If the project is not included in ECP-1 the application forms will be returned but not the €7,000 application fee. IWFA strongly believes the application fee should be fully returned if the project is not included in ECP-1. Other than the €7,000, developers have their time and advisor's fees for preparing and submitting these applications. No developers will be speculatively submitting applications to ECP-1, so it is only fair that the €7,000 fee is returned.

10. Treatment of Shared Assets

There are proposals in the consultation to fundamentally change how shared assets are allocated and charged to generators. For Gates 1-3 the TUoS/DUoS customer underwrote the cost of the shared assets. So if a member of a subgroup did not progress, the other members of the subgroup would not have their connections costs increased. This was a critical principle of group processing since it was introduced 2005. It is now proposed that all generators will have to bond their shared asset costs when executing the connection offer. If any member of a subgroup does not accept an offer then all offers in the subgroup will be withdrawn and reissued with different connections cost. This would be a race to the bottom, and a recipe for endless delay. Crucially, that delay would work against the planning criterion for grid access, along the lines already argued.

In practice this will make connection offers with shared assets unviable, particularly for small and medium sized projects. The proposed policy is discriminatory as it favours utility scale developers, particularly semi state developers, who have access to bonds or parental company guarantees. An example of the proposed changes is three 10MW projects sharing the cost of 110/38kV transformer upgrades. This would cost approximately €3m or €1m per project. Under Gate 3 each project would pay approximately €100-150k to execute their connection offers and the larger second stage

payment of €0.5-1m when the project is at a late stage of financing. The projects would have known at that point they were eligible for a support scheme such as REFIT II. It is now proposed that each project would still pay the €100-150k to execute the offer and provide a €1m bond. For most developers, including all small and medium sized developers, this bond would be equivalent to providing a €1m cash payment. This would increase the cost to execute the offer to €1.15m. This is probably equivalent to 50-75% of the total connection cost. These substantial payments would have to be made before the projects would have knowledge on whether they have been successful or unsuccessful in the auction process for the new RESS support scheme. Even though the project would have planning permission, this level of payment to execute a connection offer could not be made by any small or medium sized developers with the uncertainty of an auction process. The proposed interactive nature of connection offers sharing connection assets could also lead to substantial delays in the development of projects. Offers may have to be re-issued two or more times. This will also lead to delays to the start of the following batch.

The consumer gets substantial benefits from group processing and the sharing of connection assets. It leads to the more efficient development of the distribution and transmission assets required to connect renewables to the electricity system. Electricity consumers and taxpayers require these renewable generators to meet the 2020 renewable targets. They also benefit from the environmental, security of supply and cost benefits in the short, medium and long term of de-carbonising the Irish electricity and energy sectors. The benefits to the consumer of group processing and sharing connection assets was a key principle when the Group Processing Approach was established in 2005 and reiterated during the consultations and decisions on Gate 1, 2 & 3. In the ECP-1 consultation it is stated:

"This gate system is optimal from the network planning and cost perspective, and can yield substantial consumer savings."

The sharing of connection assets has been very successful for the consumer, the system and developers. It was started with Grid Upgrade Development Programme (GUDP) in approximately 2002 and then the GPA in Gate 1, 2 and 3. Sharing connection assets is not without challenges and it does make the development process for System Operators and developers more complex. However, there is strong evidence based simply on the volume of connections that GUDP, Gate 1, 2 and 3 have been successful. The additional capacity created with shared assets in GUDP or early Gates has generally been used by generators connecting in later Gates, so that much of the surplus capacity carried by the consumer has subsequently been used; the risk was worth carrying. Available capacity in shared assets is a key-criterion when renewable developers are identifying sites for new projects. It is very likely that any capacity that still exists will be used in the upcoming batches. The Clustering approach in Northern Ireland that has the sharing of 110kV connection assets has been similarly successful. The GUDP, GPA (Gate 1-3) and the Clustering approach all have the principle of the consumer underwriting the cost of the shared assets. If this principle had not been in place and developers had to bond shared costs at execution of offers then, in the IWFA's opinion, all three schemes would have resulted in complete failure. The negative impact of early bonding of shared assets cannot be understated and IWFA strongly oppose the proposed changes.

11. Projects Coming Off Hold

The consultation proposes that any projects that have gone 'on hold' and at a later date come off hold will be subject to new standard pricing charges. There is currently provision in connection agreements for the indexation of connection charges. IWFA are very concerned that this provision is only being included to allow for substantial increases in standard connection charging in the near future. IWFA cannot see the justification for any additional charges to be allowed and would therefore strongly oppose these proposals. It is also very important to the IWFA that any change to standard pricing, other than indexation, is fully consulted with industry.

12. Longstop Dates

IWFA are very concerned that the ECP-1 proposals have not taken account of the fact that support for renewables is generally moving towards schemes based on competitive auctions. There are two main aspects of this new support approach that need to be considered by the CRU in its decision on ECP-1. Firstly, competitive auctions are required under EU state aid rules (except for some smaller projects), so connection policy will have to be designed with this auction approach to support schemes in mind; Ireland cannot avoid an auction based approach. Secondly, competitive auctions will be good for the consumer, so any connection policies that support projects being able to competitively compete in auctions is good for the consumer.

The proposed change to longstop dates is one example of proposals for ECP-1 that have not considered the new auction process. Auctions by their nature will have 'winners' and 'losers', otherwise they are not genuinely competitive. The losers should be given the opportunity to improve their bid for the next auction; for example, by reducing the capital or financing cost of the project. Projects that are included in ECP-1 will have already shown substantial project commitment. This substantially reduces any connection risk to the consumer compared with Gates 1-3, when no such commitment was required. IWFA strongly argue that having already shown this increased commitment and considering the uncertain nature of the auction process, longstop dates should be increased from 3 to 4 years. The proposal to reduce to 2 years is showing a complete lack of understanding of the new support scheme approach for renewables. IWFA respectfully suggests that the CRU reconsider its proposals and in fact considers extending the longstop period to 4 years.

13. Non-Firm Access

The consultation proposes to issue the ECP-1 connection offers with non-firm transmission access, where the assessment of the transmission reinforcements (ATRs) and firm access quantities (FAQ) would follow later in the ECP process. IWFA can understand the timeline benefits of not including the ATR and FAQ information with connection offers, but are very concerned that there is no defined timeline of when this information will be provided.

IWFA strongly suggests the ATR and FAQ analysis should be starting during ECP-1. The information will likely be required later in the project financing process and if the ATRs are not identified, then work is clearly not even starting on the delivery of the transmission works to minimise constraints for ECP-1 generators. This issue again harks back to the core problem IWFA has repeatedly highlighted, which faces the planning-led approach - delivery of grid access sufficient to enable financing of projects before planning expiry, and having commitments on firm access form part of that requirement.

It is noted that all connection offer issued post Gate 3 through the non-GPA process are still waiting for ATR and FAQ information. As well as having to include these projects in the ECP-1 ATR and FAQ analysis, it is also concerning that some of these projects have had connection agreements for over 7 years with no deep reinforcements analysis completed, never mind works complete. IWFA strongly suggests that a more definitive timeline on FAQ and ATR works for the contracted non-GPA and ECP-1 be included in the CRU's final decision.

14. Release of Capacity

The CER decision in October 2016, CER/16/284, allowed generators to release capacity and receive back the majority of their first stage payment. This was relatively successful with approximately 300MW of Gate 3 wind capacity released. However, Gate 3 developers were being asked to make this decision without knowing the details of the ECP or any changing position on capacity relocation. IWFA would recommend that as part of a decision on this consultation, the CRU allow a further period for capacity release and the return of the majority of the first stage payment. Releasing further capacity that cannot be used for development is good for the entire industry, including consumers. This capacity release could be undertaken in parallel with the period for application submissions for the ECP-1 process.

15. Non-Batch Process

The consultation includes a proposal to continue with a non-batch process but limit it to less than 250kW generators and auto-producers. The IWFA welcome the inclusion of auto-producers in the non-batch process, but suggests that a clear definition of an auto-producer is included in the final direction. The IWFA also welcomes that the same threshold applies to all generators. However, the IWFA does have major concerns with the capacity and application caps included in the proposed decision.

The 250kW cap is extremely low. The analysis by the System Operators to propose 250kW is arbitrary and does not consider the changing demand for embedded generation from policy makers and stakeholders. As included in our previous connection policy response, we had suggested that the threshold for non-batch be set at 2.5MW for generators. Wind turbines are now generally 2-3MW in capacity, and the typical onshore unit today is 2.3MW. It is only reasonable that there should be a simplified connection process for small-scale generators, such as single turbine projects. Our proposal also aligns with the government policy to support community renewable projects, something IWFA welcomes.

The System Operators' proposals to limit the number of applications under the non-GPA process to 30 per year could politely be described as 'inadequate'. Maintaining the limit of only processing one application per 110kV node is also completely unreasonable. As mentioned earlier, NIE has over 1,200 contracted small-scale generators. These were almost all processed over a 6-year period, approximately 200 per year. NIE simultaneously processed multiple applications at the same 110kV node and in parallel with a substantial number of large-scale applications. Similar connection processes have been in place across Europe to manage the substantial increase in the demand for embedded generation.

Ireland has only had a very modest level of small-scale generation connecting to-date. Falling technology costs and the increasing demand from consumers for renewable and

auto-production generation will without doubt see a substantial demand for small-scale connections in the near future. The IWFA suggests that the CRU direct the System Operators to prepare their processes and resources to meet for the upcoming increase in small-scale connections, rather than trying to put in place inappropriate limitations in connection policy on the capacity or number of small-scale applications that can be processed per annum.

To ensure that the non-batch process is not overcome with speculative applications, the IWFA would recommend that planning permission is a requirement to apply for all generator connections, batch and non-batch process.

The consultation proposes that connections for community projects will be considered later in the ECP process. The IWFA proposals above will go a long way towards ensuring small sized community based projects can receive connection offers in a timely manner and not be delayed by the timeline and complexity of batch processing. The IWFA would recommend early engagement on how community and small projects can be best accommodated in the future ECP processes.

16. IWFA additional proposals for ECP-1

The IWFA make the following additional recommendations for ECP-1:

- The connection method meetings that took place during the processing of Gate 3 are maintained for ECP-1. These meetings remain an important opportunity for developers to discuss their grid connection with the System Operators;
- Generators should be given the opportunity during the processing of their connection offers to request a contestable connection and/or an underground cable connection.

Appendix A - Application Fees

	ESBN Fees				EirGrid Fees			NIE Application Fees	
MEC	Old Fees (excl. VAT)	New Fees (excl. VAT)	Net Increase	% Increase	MEC	Old Fees (excl. VAT)	New Fees (excl. VAT)	MEC	NI Fees (excl. VAT)
0≤11kW	€0	€0	€0	0%	≤4MW	€33,904	€0	<20kW	£566
>11kW≤50kW	€763	€1,526	€763	100%				>20kW≤150kW	£1,697
>50kW≤250kW	€1,557	€3,114	€1,557	100%				>150kW≤2MW	£5,659
>250kW≤500kW	€1,557	€33,842	€32,285	2074%				>2MW≤5MW	£8,488
>500kW≤4MW	€8,841	€33,842	€25,001	283%				>5MW≤20MW	£31,488
>4MW≤10MW	€27,276	€67,557	€40,281	148%	>4MW≤20MW	€67,681	€65,557	>5MW≤20MW	£31,488
>10MW≤20MW	€52,831	€67,557	€14,726	28%	>20MW≤100MW	€87,228	€87,013	>20MW	£41,488
>20MW≤30MW	€52,831	€87,013	€34,182	65%					
>30MW≤50MW	€61,565	€87,013	€25,448	41%					
>50MW≤100MW	€73,836	€87,013	€13,177	18%	>100MW	€96,006	€95,829		
>100MW	€86,426	€95,829	€9,403	11%					