

Mercury Renewables (Carrowleagh) Ltd
Coolcronan House
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Foxford
Co Mayo

The Commission for Regulation of Utilities,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

By email to: electricityconnectionpolicy@cru.ie

13th December 2017

Re: Enduring Connection Policy Phase 1 Proposed
Decision Consultation, CRU/17/309

Dear Sirs,

Mercury Renewables Ltd are the developer for the Carrowleagh Kilbride Windfarm Scheme. We have been working on this project since 2007. We secured planning approval for the 48.4MW scheme in 2013. A grid connection application was submitted in May 2009. Since 2007, we have invested a huge sum of money in this scheme. We now welcome the opportunity of making this submission to the CRU.

Firstly, we believe it will be a major benefit for the industry to move to a planning led approach when considering future grid connection criteria. The existing mechanism, whilst being successful in part, has led to a bottleneck for the industry. Making planning approval a requirement will stop grid trading and the need for grid re-location.

We list below proposed amendments required to make Enduring Connection Policy Stage 1 (ECP-1) effective for our project and, we believe, would improve the connection process for the entire energy sector.

- (A) Renewable projects should have priority access to new grid capacity
- (B) The proposed Batch size of 600MW for non DS3 projects is too small.
We propose that the Batch size should be in excess of 1000MW
- (C) Priority should be based on planning approval dates and not planning expiry dates. Without this, schemes that have secured a 5-year approval will leapfrog schemes that requested and were granted a 10-year approval. It also opens the grid process to the potential of gaming.
- (D) We are concerned at the timelines between achieving planning approval and eventual grid connection. Having shown substantial

project commitment, a developer should be allowed to continue that commitment. In the period between planning approval and connection, the developer should be allowed to improve the scheme by researching newer more efficient turbines without sacrificing its connection offer. We therefore do not believe that amendments to a project's planning permission should impact on the status of its grid connection agreement.

- (E) To ensure the limited grid capacity available in ECP-1 is not taken up a small number of larger developments, we propose that a cap of 100MW per development is adopted. This should also ensure that ECP-1 does not drive the need for major new transmission reinforcements.
- (F) Removing the consumer underwriting shared assets will make group processing unworkable. Developers will not be able to put in place substantial bonds along with first stage payments.
- (G) ESB Networks application fees should not be increased. The charges already in place are some of the highest application fee charges across Europe.
- (H) Firm access information, including FAQ and ATR info, needs to be provided with defined timelines.
- (I) Based on the level of commitment already shown to our scheme, we propose that the suggested 2-year longstop dates are extended out to 4 years. With the new support scheme being an auction process, generators need to have the flexibility to be able to compete in at least two auction rounds.

We trust that the Regulator finds this submission useful in finalising the Enduring Connection Policy.

Kind Regards,

A handwritten signature in black ink, appearing to read 'J.P. Duffy', written in a cursive style.

J.P. Duffy
Director