



Commission for Regulation of Utilities  
The Grain House  
The Exchange  
Belgard Square North  
Tallaght, Dublin 24  
D24 PXW0  
Ireland

15<sup>th</sup> December 2017

**RE: Response to the Enduring Connection Policy Stage 1 (ECP-1) - Proposed Decision.**

Dear CRU,

Lightsource is a global leader in the development, funding and long-term operation of solar photovoltaic (PV) power projects. Lightsource operates the largest portfolio of utility scale solar in Europe with 2 GW under management and has development platforms across Asia Pacific and North America. The company's proven track-record is well known within the solar industry, having delivered numerous award-winning projects that are recognised as pioneering, innovative and best-in-class. Lightsource established its Republic of Ireland business in 2015.

Lightsource commissioned the first ground mounted solar PV farm on the island of Ireland at Belfast International Airport in early 2016. From site feasibility studies to first generation this project took two years to complete, thanks in part to efficient and robust grid connection policies and processes. Since then, we have commissioned a further six solar farms in Northern Ireland and currently have an additional three under construction which will bring our Northern Ireland operational portfolio to 84 MW.

In Ireland, Lightsource has two planning consented solar projects in Cork and Tipperary totalling 50MW and an EirGrid contracted 80MW connection for a solar project in Meath which is currently going through the planning process. In total, we have an advanced stage development pipeline of 300MW with 4 grid applications processing with EirGrid and 5 applications on hold with ESB, all under CER/09/099. Our ambition is to have 100 MW generating by 2020.

We thank the Commission for the opportunity to provide our thoughts in relation to the Enduring Connection Policy Stage 1 (ECP-1) and support the submission by the ISEA group.

However, we would like to further highlight some areas which we believe require more clarity, namely:

1. While Lightsource supports the CRU proposal for planning permission to be a prerequisite in order to apply for a grid connection under ECP-1, we do so on the basis that it excludes any requirement for planning permission for the grid connection related infrastructure for the proposed power plant, as this will not be possible until a grid connection offer is provided, accepted and the connection is designed. This needs to be made clear in the new legislation.

2. We would strongly recommend the introduction of a refund scheme on similar terms to those set out in the CRU decision paper “Connection policy transitional arrangements” (Ref: CER/17/090) where relevant for projects that fall into either of the following scenarios;
  - Projects which have applied for connection under CER/09/099 which will now not be processed under this approach.
  - Projects, Contracted/Live/Processing under CER/09/099 or future under ECP-1, that due to the proposed changes, will not have rights to relocate/trade capacity should they be unable to progress to connection.

In relation to the latter point, developers should be able to withdraw from the connection process in exchange for a full refund, less the reasonable costs incurred by the TSO/DSO up to the point of withdrawal. For contracted projects, this will incentivise developers to release rather than hoard capacity for projects which may never be realised which is a key objective for the CRU’s enduring policy.

Yours sincerely,

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