



## Response: Enduring Connection Policy Stage 1 (ECP -1)

Indaver Ireland welcomes the publication of the proposed decision on the Enduring Connection Policy – Stage 1 (ECP-1) and recognises the importance of proposals contained therein which aim to promote a more optimal use of the existing network taking into account the current system needs, national policy and the consumer interest.

Notwithstanding the same, Indaver has a number of concerns regarding these proposals.

These concerns include:

1. ECP-1 must prioritise renewable generation in line with national and EU policy;
2. The insufficiency of the capacity set out for Batch 1. Without further capacity provision it appears likely that delays will occur once again; and
3. The prospect that new and viable projects may not succeed to completion under this proposed framework.

Failure to address these concerns in ECP-1 could have the undesirable effect of failing to meet national policy objectives and ultimately add a cost burden to the consumer.

### **About Indaver**

Indaver currently owns and operates a small, centrally dispatched hybrid renewable generator in Duleek, Co. Meath and is currently in the planning stages with regard to developing two similar generators in Belfast and Cork.

In relation to Cork, Indaver currently has an application for Strategic Infrastructure Development (SID) lodged with an Bord Pleanála for the development of a waste to energy facility (PA0045), a constituent part of which involves the generation of renewable energy from municipal solid waste.

Waste-to-energy hybrid capacity is controllable and predictable, though the operation is driven primarily by waste treatment rather than energy production. Therefore, the inability to connect to the grid in a timely fashion will not only have energy implications; it will also have a significant impact on waste treatment needs in Ireland and the ability to meet overarching energy and environment policy objectives.

### **Summary of recommendations**

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#### **A. Renewable Prioritisation & the DS3 Programme**

It is submitted that prioritisation of renewable energy projects must be provided for in ECP-1. Renewable generation may be regarded as more valuable due to the fact that increased renewable projects are required to help Ireland achieve its RES-E targets for 2020 and beyond. The proposed decision underlines the importance that should be afforded to renewables and specifically states that the connection of renewables, and the attainment of



targets for renewables is a priority and should be the primary driver in the design of connection policy. A requirement also exists under EU law for priority access for renewables, and is also recognised at national policy level in the White Paper on *Ireland's Transition to a Low Carbon Energy Future 2015-2030*<sup>1</sup>

### **DS3 Eligibility Criteria**

In order to be eligible for classification as a DS3-prioritised system provider, a project must meet the following DS3-specific criteria:

- Prioritisation of Fast Frequency response (FFR); or
- Primary Operating Reserve (POR).

As both of the above criteria are satisfied in the context of Indaver's WtE facility in Meath and which would also be the case in the context of the proposed facility WtE in Cork, under the terms of ECP-1 it is therefore submitted that such generators meet the DS3 eligibility criteria.

Waste to energy plant can deliver FFR and POR services from a synchronous machine driven by a renewable energy source. This capability either through the DS3 batch or generation batch must be valued and prioritised in ECP-1.

### **B. Connections process and queue**

In addition to the above observations, there is a very noticeable lack of capacity in the present proposals. Without a greater level of capacity, as the present level is hugely deficient in terms of going far enough to satisfy the existing requirements and accordingly, it appears likely that a backlog will once again be created if further capacity is not provided for in an expedient manner.

Should this not be provided, it will necessarily mean that the system will not be best placed to operate in an optimal manner. Furthermore, it may also give rise to the unintended consequence whereby the most viable, efficient projects and 'ready to build' projects may be excluded and will accordingly have to face an uncertain wait for another round of ECP.

If only the most recent projects which achieve a planning consent of such a limited batch size, this would negatively impact the consumer from a cost perspective and would also undermine the achievement of policy objectives regarding the prioritisation of renewable projects.

Therefore, it is asserted that a much greater level of capacity should be provided as the proposed batch of 600MW and potentially only 30 projects is not sufficient. A failure to do so is likely to once again give rise to queues as seen previously and undermine the effectiveness of the system as a whole.

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<sup>1</sup> Department of Communications, Climate Action and the Environment (DCCA).



### **C. Planning Permission requirements**

A key proposal for ECP-1 is the requirement that planning permission is necessary for entry to the 2018 batch. This requirement does not pertain to DS3 providers and should not be applied to renewable generation applications where the DS3-specific criteria referred to above are met.

It is submitted that it may not be the most practical solution to include such a requirement within the connection offer process but in the event that such a requirement is applied, it would appear to be more practicable to apply the same from a later date in 2018 to ensure that the newest and most viable projects can avail of connection offers within the next batch.

We hope the foregoing observations are useful. Should any further elaboration on the above points be required, Indaver would be happy to provide the same.