

Commission for Regulation of Utilities,  
P.O. Box 11934,  
Dublin 24

15<sup>th</sup> December 2017

Dear Ms. Gosia Sadowska

Please find below our comments on the proposed decision and accompanying rulesets on the Enduring Connection Policy – Stage 1 (ECP-1). Our response is primarily around the proposed limitations on capacity relocation. We agree that capacity relocation should be limited as the emergence of the secondary capacity market has led to project delays and has facilitated applications which are speculative in nature.

We however believe that a blanket imposition of a 100m maximum relocation allowance is unnecessarily harsh.

A company may have submitted a grid connection application at a particular location and proceeded to develop a project however during the planning phase may have been advised by the planning authority to site the project in a different location. The company may have continued to develop the relocated project and been granted planning permission that requires a relocated connection point to allow grid connection. It is inefficient to not allow such a project to be able to adjust its connection method to allow the project to connect to the network.

Secondly a project for technical reasons may need to relocate its connection point within its own red line planning boundary. A planning boundary could be many kilometres long/wide and a 100m max relocation limit is restrictive.

**We request allowance to relocate capacity as was granted under CER/09/099 be made for projects that are;**

- 1. currently contracted;**
- 2. currently have connection offers processing under CER/09/099; or**
- 3. have chosen Option 2 to delay the decision to process either under CER/09/099 or ECP1 until one month after the finalisation of the ECP1 design.**


If the CRU requires a restriction on allowance of capacity relocation for the above projects than we believe the following pragmatic controls could apply:

- The 110kV grid connection application node is not changed
- The local ESNB substation that the project directly connects into is not changed
- The company has a project with valid planning permission at the new location.

**We believe allowance should be made for future capacity relocations greater than 100m under ECP 1 where:**

- The 110kV grid connection application node is not changing
- The local ESNB substation that the project connects into is not proposed to change
- The new connection point is located within the original red line planning boundary

Yours Sincerely,



Laurence A. Phelan

Director