



**Local Office**

Suite 6, The Mall, Beacon  
Court, Sandyford, Dublin 18  
Tel: +353 (0) 169 713 44

**Registered Office**

Suite 6, First Floor  
The Mall Beacon Court, Sandyford  
Dublin 18

www.naturalpower.com  
sayhello@naturalpower.com

Registered Co Number 522742  
VAT No IE 319 4275 IH

---

**Consultation Response on the Draft Enduring Connection Policy : Proposed Decision & Proposed Ruleset**

Dear Commission for Regulation of Utilities

The following comments have been compiled by Natural Power Consultants Limited (Natural Power) on behalf of Codling Wind Park Ltd (CWPL). Codling Wind Park is an offshore wind farm project in Irish waters which consists of two phases. The first phase (Codling Wind Park) is a consented, 1 GW project, while the second phase is an as yet unconsented extension of Codling Wind Park (Codling Wind Park Extension). Both projects await a viable grid connection before either can be progressed further.

The non DS3 batch size needs to be increased significantly to facilitate the efficient delivery of offshore wind. It is clear that ECP-1, in its current form, does not endeavour to facilitate offshore renewable generation. The Regulator should strive to facilitate renewable energy rather than hinder it, and the current batch size is an inhibitor to the efficient delivery of offshore wind. CWPL strongly advocate the increasing of batch size for this batch, and subsequent batches, as crucial for the delivery of offshore wind to Ireland.

It is noted with concern that the key proposal for ECP-1 provides very little detail on the provision for offshore project connection. Both the Proposed Decision and the Ruleset fail to address offshore in detail, or to prescribe specific requirements for offshore projects. CWPL requests that such considerations are included within the policy, and offshore wind is given specific attention with respect to facilitating the connection of projects holding Leases.

Furthermore, while the differences in consenting regimes for onshore and offshore projects are acknowledged in the proposed ruleset ECP-1, the Connection policy fails to provide certainty for connection points needed for offshore projects. This has been a criticism of the Connection Policy, and the Department's Offshore Renewable Energy Development Plan, in the past. It is considered a critical oversight, as without this certainty, it is impossible to identify the locations of various surveys that are required to progress the grid connection options. Such surveys include seabed surveys to confirm offshore route selection and securing land rights to enable cable routing from landing point to the substation connection. CWPL request that the policy provides more certainty for suitable connection points for offshore projects going forward.

CWPL appreciates the acknowledgement by the Commission for Regulation of Utilities (CRU) that interconnectors have the potential to play a key role in facilitating growth in renewable generation. However, ECP-1 does not apply to interconnection, and instead interconnectors are being progressed under a separate consultation (CER/16/239). Thus to ECP-1 does not provide any certainty for future interconnections and facilitating growth in offshore generation. Furthermore, the requirement that only interconnector applications which have received the Project of Common Interest (PCI) status are progressed, presents an additional obstacle for the delivery of offshore wind.

CWPL respectfully request that there is more integration between ECP-1 and the separate consultation happening under (CER/16/239). It is not clear if the separate consultation will consider the key role interconnection plays in facilitating growth in renewable generation. CWPL would request that the CRU clarifies the following:

- The timeframe for separate consultation of CER/16/239;The objectives of CER/16/239;
- Is transboundary consultation been undertaken by the CRU in relation to CER/16/239; and
- How will interconnectors which don't have PCI status be progressed?

The following process parameters are noted:

- The proposed process is open to all projects regardless of technology;
- EPC-1 aims to facilitate build-ready projects; and
- The Commission for Regulation of Utilities (CRU) are keen to promote more optimal use of the existing network.

In the context of the above parameters, offshore wind projects such as Codling Wing Park fall within these process parameters. CWPL is also fully committed to progress the Codling Wind Park Extension and will be seeking a grid connection for the project in due course.

Accordingly, CWPL would strongly advocate that:

- the proposed decision must make specific provision for offshore wind projects. In parallel to this, it is understood that EirGrid are currently undertaking a study called the “east coast study” which is an assessment of the opportunities to connect generation along the east coast of Ireland.
- Priority access should be granted to renewable energy projects as required by the RES Directive. Conventional Generation should be processed in separate batch.
- The new requirement for projects to have planning permission in advance of applying for the 2018 batch is noted. Given that this is a pre-requisite, the planning application process should allow amendments to facilitate optimum modern technologies to be deployed including turbine size, foundation layouts etc.

While we recognise that this consultation is centred on the first batch of many, we would request that a Road Map be provided to indicate when we can anticipate the next batches and their likely capacity.

Furthermore, it must be bore in mind that the Department's Offshore Renewable Energy Development Plan will shortly undergo review, and thus the offshore grid and renewable energy projects should be facilitated in all key policy documents.

Yours Sincerely,

On behalf of Codling Wind Park Ltd.,

Gael Gibson  
Principal Consultant  
+353 (0)1 906 1368  
gaelg@naturalpower.com