

15th December 2017

Enduring Connection Policy Consultation
Commission for Regulation of Utilities
The Grain House
The Exchange
Belgard Square North
Dublin 24
D24 PXW0

Re: Enduring Connection Policy Consultation

Dear Sir/ Madam,

Harmony Solar welcome the CRUs proposed decision on ECP-1. In particular we welcome the move to a planning based grid access policy which we hope will bring an end to the practice of highly speculative grid applications.

Harmony Solar began developing solar pv generators in Ireland in 2015. We now have a total of 15 projects in development and have received planning permission for 36MW on 2 sites. We are also awaiting a decision on a number of projects at local County Council level and An Bord Pleanala totaling over 100MW's in 5 applications.

Harmony's developments have not received any grid connection offers under the Non GPA policy. This has primarily been due to the high volume of speculative connection applications which have led to very long processing queues at the 110kV nodes where we are in development. Instead of rushing to make grid applications Harmony carefully selected our sites and conducted our oven connection method studies to determine viable locations for solar PV generation.

Our approach is in stark contrast to many other solar applications which sought to "book" capacity on unviable sites and in many cases in locations where a viable connection offer could not be offered. This practice and distortion of the Non GPA policy has effectively excluded our consented sites from receiving a connection offer while ESNB have in many cases been processing extremely high cost and unviable connection offers for speculators. It must also be noted that a high volume of the applicants which have received a connection offer and are now contracted relate to sites which have not and never will receive a planning consent. It is important that future policy clears out these MWs from the system as soon as possible.

Harmony support the ISEA submission on ECP and in particular we wish to stress the importance of ensuring that ECP-1 is not limited in size as per the proposed direction. Central to the aim of ECP-1 must be an ambition to process as much consented renewable generation as possible. By limiting ECP-1 to 600MW and possibly as few as 30 applications, a back log of consented projects will form waiting on policy and a timeframe for the next batch. This



approach is at odds with a move to a competitive auction based support for renewable generators. A limited batch will also mean that in areas where potentially a group could form some generators which could make a contribution to shared assets could be excluded. As a consequence potentially viable projects will be unable to accept high cost connection offers.

We would like to thank you again for the opportunity to participate in the ECP consultation.

Yours sincerely,

A handwritten signature in blue ink that reads "John Swan".

John Swan
Director

