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15/12/2017

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

Submitted by email to: electricityconnectionpolicy@cru.ie

Re: Response to ECP-1 proposed decision

Gosia

Galetech Energy Developments Cloghan Ltd welcomes the opportunity to make a submission in respect of the CRU's 'Electricity Connection Policy Stage 1' (ECP-1) proposed decision. We believe that in general the key principle set out in ECP-1 of a move to a planning based system is a very welcome step and that ECP-1 can be successful in rationalising the grid queue and resolving many of the grid access issues as long as the first batch of ECP is appropriately sized. Cloghan supports the IWEA submission on ECP-1.

Cloghan Wind farm is a 9 turbine wind farm which was granted planning permission in October 2016. We are hopeful that the project will be included in ECP-1 however we are unsure of how much other consented generation may be seeking a connection offer. The timing between the new "batches" is key to success of this policy. Without concrete proposals we cannot be confident that the next batch to be processed will not take another 10 years to materialise. We hope that CRU direct the system operators to process as much renewable generation as possible in ECP-1 to ensure that the most competitive projects will be able to participate in the upcoming RESS auctions.

We support the end to the processing of offers under the Non GPA policy which has been distorted by solar PV in recent years. We believe the suspension of a large volume of live and in process solar offers is a poor decision. While the rush for non GPA solar access could have been stopped some time ago now is not the time to allow speculative projects which do not have planning consent more time to speculate. In the time taken to make the final decision on ECP-1 all off the processing and live offers could have been issued. This would force these projects to either accept or reject their offers and allow the first ECP batch to be processed with fully consented projects only.

Cloghan fully support the DS3 program the aim of ECP to ensure that the necessary system services are delivered to ensure that curtailment for wind farms can be maintained at a level which continues to make investment in wind energy in Ireland a viable proposition. We believe however the alignment with the DS3 auction process is crucial to ensure the ECP-1 and the DS3 auctions don't produce alternative results. It is crucial however that any delay with DS3 does not impact the processing of renewable energy connection offers.

We also believe that further consideration should be given to the potential of hybrid generators to deliver DS3 services. By making better use of the connections that are already present on the system a higher volume of distributed DS3 service providers can be delivered at much greater speed without further stressing the system operator's resources in producing DS3 specific connection offers and building new connections.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steven Drury', is written over a light yellow rectangular background.

Steven Drury

Project Development Manager

On behalf of

Galetech Energy Developments Cloghan Limited