

## Gosia Sadowska

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**From:** Paul Blount <Paul.Blount@abo-wind.com>  
**Sent:** Friday 15 December 2017 10:08  
**To:** Electricityconnectionpolicy  
**Cc:** Emmet Egan  
**Subject:** Response to ECP-1 Proposed Decision CRU/17/039

Dear Sir / Madam,

We would like to thank the CRU for the opportunity to respond to the proposed decision on Enduring Connection Policy Stage 1 (ECP-1) CRU/17/309. We have been working on a detailed response with our colleagues in the Irish Wind Energy Association and wish to voice our support for their submission which we understand will be submitted later today.

This email response is being made on behalf of ABO Wind Ireland Limited (AWI) and Castlewaller Wind Farm Limited (a wholly owned subsidiary of AWI).

In supporting IWEA's position we would like to place particular attention on the following points:

1. We strongly support IWEA's position on charging and shared asset bonding.
2. Whatever the final batch size, we believe it is essential and in fact required under European law, that renewable energy projects are prioritised.
3. We strongly support the position that the process should result in connection offers for all consented wind farms. Wind energy projects have effectively been locked out of the grid for 10 years. The batch size selected in this respect is critical and we support IWEA's call for at least 1000MW of wind equivalent being made available to renewable energy generation projects. This is in consumers interests as restricting access to consented cost effective sites would limit competition in any future auctions pushing up PSO costs unnecessarily. The priority allocation for DS3 should be in addition to this, and appropriately sized to ensure competition.
4. In tie breaking between projects that have planning consent we strongly believe that this should be based on date of planning grant not date of expiry. To highlight this, our Castlewaller Wind Farm applied for its grid connection offer in Dec 2007 and has had a full planning permission since May 2012, with a 5 year extension granted such that planning will lapse in 2022. Under the proposed ruleset this project could be skipped by a solar project that received a 5 year planning in 2016, which would be extremely unjust.
5. We would also very much support the suggestion that consideration be given to applying a 100MW cap to any individual project. There are likely to be only a relatively small number of projects above this size and given their potential impact on the system, we believe a separate process is required, to ensure that the system is developed efficiently for projects on this scale. A cap of 100MW is consistent with the proposals for DS3 access.
6. We would strongly support the suggestion that projects that submit grid connection applications stating that no planning consent is required for their project, should be required to provide a Section 5 declaration to that effect in order to prevent gaming.
7. We believe that the proposed inflexibility on planning is unnecessary and could also impact on consumer costs. Provided a developer can show that there are commercially available turbines that match the planning permitted turbine dimensions with an MEC at least equal to that being asked for, then we support the flexibility provisions that will be put forward in IWEA's response.

Thank you again for the opportunity to respond. We very much look forward to the introduction of a successful new grid access process for renewable energy projects in Ireland.

Kind Regards,

Paul

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