

Commission for Regulation of Utilities,  
The Exchange,  
Belgard Square North,  
Tallaght,  
Dublin 24,

Submitted by email to: [electricityconnectionpolicy@cru.ie](mailto:electricityconnectionpolicy@cru.ie)  
Submitted on: 15<sup>th</sup> December 2017

## **Re: Fingleton White's Response to the Enduring Connection Policy Stage 1 (ECP-1) Proposed Decision**

Fingleton White welcomes the opportunity to comment on the public consultation on the design of a new Enduring Connection Policy.

Fingleton White provides multidiscipline engineering services for the energy industry throughout Ireland and the UK. It operates across multiple sectors including gas, CHP, bioenergy, hydro, water and telecoms.

In general, Fingleton White are pleased with the clarity that the ECP-1 proposed decision brings to the energy industry in Ireland. In particular the continuation of the treatment of autoproducers outside of the batch process. This will allow the continued development of embedded generation which reduces the demands on the local grid infrastructure and supports the efficient generation of electricity. It also allows industry to develop without the requirement for additional electrical grid upgrades. This supports both employment and reduces the costs for electricity consumers.

The following are our comments on the proposed decision;

- Fingleton White feels that the date of publication of the proposed decision, 2<sup>nd</sup> November 2017, is the most suitable cut-off date for when planning permission needed to be granted.
- The prioritisation of applications in the batch system, that are not DS3 qualified, should have some more detailed criteria to ensure that projects which minimise the cost to the electricity consumer are selected when there is an oversubscription of valid applications. The following are two criteria that Fingleton White feel would help to achieve this;
  1. **Capacity factor** (similar to the DS3 criteria). Projects with a higher third party projected capacity factor should be prioritised. This will ensure that projects which maximise the grid infrastructure are selected. This criterion would still be technology neutral but would ensure that the electricity customer is not paying for potentially unnecessary additional grid developments to meet the capacity requirements.
  2. **Location**. Projects located in areas with high electrical demand should be prioritised over remotely located projects. As the cost of land near high electrical demand locations would normally be higher than remote locations, there could be a risk that projects would not be developed near demand centres. This would lead

to an inefficient use of the existing electrical infrastructure and potentially the requirement for the development of more transmission network and additional costs to the consumer. A possible method to implement this could be that the availability of capacity at each 110 kV node is listed and each node is ranked based on its connectivity to a high demand location. Applications are accepted starting with the highest ranked node until the capacity at that node is met. This would continue down the node ranking until all capacity in the batch is met.

- We do not see any value in a solicitor certifying the evidence of the planning permission in the application. This adds unnecessary cost with no clear benefit.
- The non-batch threshold of 30 offers per year may need to be reviewed and increased after the first year depending on the quantity of applications that are made from both DS3 qualifying trial and 11kW-250kW projects.

Fingleton White are happy to discuss our views in more detail in person or at future workshops.

Regards,

A handwritten signature in black ink, appearing to read "Ronan Nevin".

Ronan Nevin