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**Submission to
Commission for Regulation of Utilities**

on

Enduring Connection Policy Stage 1 (ECP-1) Proposed Decision
CRU/17/309, 2nd November 2017

Non-confidential

by email to: electricityconnectionpolicy@cru.ie

15th December 2017

Slieveveagh Power Ltd welcomes the opportunity to respond to the CRU's proposed decision on ECP-1.

The CRU's proposals to move towards a planning led system are welcome. However, we wish to comment as follows:

Comments

1. Priority Access for Renewables

To meet Ireland's binding 2020 and 2030 renewable targets, Renewables should have Priority Access in ECP-1.

2. ECP-1 Co-Ordination with Proposed DCCAE RESS

Projects participating in the proposed future RESS schemes are to be 'build ready'. Therefore, it is important that the number of 'qualifying' projects eligible to compete in the RESS Auction is not limited by project Grid Connection delays. This would be anti-competitive for an RESS Auction and therefore to lowering consumer PSO levies.

3. Batch Size & Use of Planning Expiry as Criteria

Projects with Planning Permission should be processed for Grid Connection – On Application. The Date of Expiry or Date of Receipt of planning should not be relevant and should not be a criterion in prioritizing projects for Grid Connection. A 'batch' limit of 1,500 MW should be set.

To encourage a wider distribution of renewable projects:

- a) An upper limit of 100 MW should apply to any project size
- b) A batch of 100 MW should be ring-fenced for small scale projects (ie those <= 5 MW)

4. Capacity Relocation

To facilitate the practical construction of a project – the project's Grid Connection, Point of Common Coupling, should be relocatable to anywhere within the project site, subject only to planning permission.

5. ESB Networks Fees

- a) The proposed increases in ESB Networks application fees are completely unacceptable.
- b) Fees paid to ESB Networks for Grid Connection Applications that have not already been processed should now be refunded in full.

To overcome future speculative applications, Slieveveagh Power would like to re-emphasise that planning permission should be a pre-requisite for all Generator Connection applications.

To encourage the development of future genuine renewable projects a reasonable timeframe for the project's development, through Planning, **Grid Connection** and RESS support must be established.