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**Submission to
Commission for Regulation of Utilities**

on

Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision,
CRU/19/143, 29th November 2019

Non-confidential

by email to: electricityconnectionpolicy@cru.ie

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1. Introduction

The IWFA welcomes the opportunity to respond to the CRU's proposed decision on ECP-2. The IWFA supports several of the CRU's proposals included in the consultation document. For example:

- A. we welcome the proposal to have regular ECP-2 batches, as long as that is implemented so that groups are not disrupted,
- B. the continued requirement for planning permission, subject to further comment related to that principle below,
- C. early engagement on connections, and,
- D. we warmly welcome the new opportunity for capacity hand-back, which should release most of the remaining stranded capacity and assist some of our Members caught in that position.

IWFA's major concern with the ECP-2 proposals, and this is shared across the renewable industry, is that rather than actively seeking to eliminate the growing queue of renewable and battery projects waiting for connection offers, and moving us to an enduring model, they may have the opposite effect. IWFA fully supported the transition to a planning-led system, which it considers more logical and less risky, but on the understanding that the processes would be improved and resourced to allow for projects to move promptly from receiving planning consents to receiving a connection offer and then qualifying for the RESS auctions. The current proposals will result in any small or medium sized wind farm project that received planning consents recently or in the coming years being excluded from the three ECP-2 batches and the RESS auctions. This is completely unsatisfactory. To support competition and diversity in the RESS auctions, Ireland meeting its 2020, interim and 2030 targets and the longer-term objective to decarbonise the Irish energy system, it is critical that the connection offer process stops being an unnecessary bottleneck in renewable development process.

IWFA has pointed out on many occasions over the years, that a planning-led approach can only work with more efficient and, crucially, timely delivery of grid connections (well within planning horizons), not just connection offers, with penalties for failure to deliver (compensation or deemed access). In our last two responses to the CRU's consultation on Connection and Grid Access Policy, the IWFA outlined our concerns and proposals for the timely and cost-effective delivery of grid connections. We request the CRU continues to consider these proposals in the development of ECP-2 and wider connection policy:

".., IWFA believes some overriding principles on access are required:

- *assuming grid access delivery well within project planning horizon, planning to be a condition of access (as proposed by CER);*
- *indeed, planning to create a requirement for either a connection offer or a refusal on stated grounds, as per the Electricity Act;*
- *it is for the market and the Government (via its support scheme), and not really for the TSO or regulators, to decide on the level of demand for access, whereas it is for the TSO (as regulated) to decide if access must be refused;*
- *group processing to be maintained insofar as planning law permits (taking account of the implications of the O'Grianna case....¹"*

¹ Pages 2 & 3, IWFA Submission (dated 5th Feb 2016) to Commission for Energy Regulation on "Review of Connection and Grid Access Policy: Initial Thinking & Proposed Transitional Arrangements" CER/15/284, 11th December 2015

This IWFA response is focused on the proposals in the CRU's proposed decision on ECP-2. As well as major concerns on the size of the ECP-2 batches, the IWFA wishes to raise in our response some other concerns with the CRU's proposals for ECP-2. The main concerns include:

- All renewables must have priority access into ECP-2
- It is discriminatory to provide priority access to only large renewable projects
- Firm access policy needs to be addressed in 2020. It is part of the SEM principles to be issuing connection offers with deep reinforcement information.
- More consideration needs to be given to how community projects can receive grid access.
- Removing consumer underwriting of shared asset costs has made group-processing unviable for many small and medium sized wind generators.
- Need for new ESB Networks planning standards to apply to modifications of ECP-1 projects.

These concerns as well as detailed comments and proposals on all aspects of the CRU's proposed decision are included in the sections below.

2. Timeline and Size of Batches

The IWFA supports in principle the proposals to have regular batches. For the overall development process for renewables generation to be efficient, and to ensure Ireland meets its interim and 2030 targets, it is critical that shortly after a project receives planning consents it can apply and be included in the next ECP batch. The caveat is that this must be implemented in a way that does not continuously disrupt existing groups already being progressed.

The IWFA is concerned that it is proposed that the ECP-2.1 batch is not starting until Q1 2021. We understand that the decision on ECP-2 will be made in Q2 2020 and the last ECP-1 offers will also issue in Q2 2020. We would suggest that the application process should start in Q2 2020 and the System Operators should start processing the offers in Q3 2020. We cannot see any reason or need to link the start of the first ECP-2 batch to RESS-1 auction results or the full completion of ECP-1. For a start, not all projects will proceed through RESS. We note that the proposals for ECP 2.2 and 2.3 batches include overlap between batches and no link to RESS auctions. The proposal to start the ECP-2.1 batch in Q2 2020 is consistent with the CRU objective to maintain batch frequency momentum. We also note that the Climate Action Plan states that the processing of ECP process offers should start in Q3 2020, not Q1 2021.

A delay in having the next ECP batch will have negative consequences for competition in future RESS auctions and meeting interim EU targets. It is noted that we have not met our 40% 2020 RES-E target and there will be EU penalties until the 2020 targets are met. One of the reasons for not meeting the 40% target was the lack of a connection process between Gate 3 and ECP. There were many wind-farms that got planning early in the last decade that are only receiving connection offers in ECP batches. We need to learn from this mistake and not let the connection offer process be a reason why renewable targets are not met. Based on a 70% 2030 target, there are interim targets to achieve 45.4% RES-E in 2022 and 52.9% in 2025. The earlier a project receives a connection offer the more time it has to prepare for a RESS auctions, which could include get further planning consents for grid connection assets. For these and many other good reasons, a delay of 6-

9 months and linking it to the completion of ECP-1 and the results of RESS-1, both with risks of delay, is completely unnecessary.

We support the CRU's proposal to cap the batch size based on the number of connection offers rather than capacity. This creates more certainty for the System Operators and industry. A small number of large generators projects could take up almost all of a batch capacity based on a MW approach.

The CRU is proposing that each ECP-2 batch will process 50 connection offers, 150 offers being processed over a 3-year period. We note that the CRU is open to reviewing the size of the batch based on feedback from this consultation. The IWFA, and the wider renewable industry, have major concerns with the proposal to have a batch size of just 50 connection offers. Similar feedback was provided by industry at the CRU's workshop in June 2019.

The Government's Climate Action plan is clearly calling for a step change across all sectors of Ireland's society, industry and commerce to meet the new agenda to decarbonise. In the plan (Action 19) it clearly calls out the ECP policy and process as the key enabler for ensuring connection offers are provided to renewable projects to allow renewable energy targets to be met. It requires the process to be '*fit for purpose*' and annual reporting on the '*timeliness of grid connection*'. ECP-2 should therefore be the opportunity to bring in a step change to processing of renewable generator connection offers in Ireland. From our interaction at the industry workshops and reviewing the proposed decision, there appears to be a focus by the CRU and the System Operators on allowing past practice to determine the design of the ECP process. IWFA are strongly calling on the CRU to exercise its leadership role, as required in the Climate Action Plan, and direct the System Operators to design and resource the ECP-2 process to meet the requirements of the renewable industry, so that we can deliver the projects required to meet the interim and 2030 renewable targets. As we have not met the 2020 targets, and the 2022 and 2025 interim targets are challenging with the growing electricity demand, there is a need to do everything that is reasonably possible to ensure that all projects with planning can compete in the RESS auctions. There is absolutely no reason why ESBN and EirGrid, both with strong track records in the operation of other aspects of their businesses, cannot design and resource a connection offer process to manage all connection applications in a timely manner.

There appears to be over 150 renewable projects with planning consents and no grid connection offer. There are also over 50 battery projects. This does not include projects in ECP-1 that may decide for various reasons to not accept their offers and reapply into ECP-2. There will also be existing contracted projects looking for additional MEC for extensions. There are also approximately 25 projects in the planning system with no grid capacity. Over the period of ECP-2 it is clear from information provided to the CRU that there is a strong pipeline of windfarm projects in development that will be applying for planning in the coming years.

From the above information it is clear that processing only 50 offers per batch, a total of 150 by Q3 2023 will still result in a substantial queue during and at the end of the ECP-2 process. IWFA are strongly requesting that ECP-2 is designed and resourced so as there is no queue of applications at the end the ECP-2 batches. To achieve this it is clear that batches of approximately 125 projects are required. Based on ECP-1, this will likely require the DSO to process 100 applications and the TSO 25 applications during each batch.

Processing of only 50 offers per year is actually a backward step. ECP-1 required the processing of 140 connection offers over what was really an eighteen-month period. There was a substantial delay between the CRU ECP-1 decision and the System Operators invoicing and being fully focused with resources to process ECP-1 applications.

We also note that:

- In 2016 ESB Networks processed over 100 new non-GPA connection offers. This was in parallel with the Gate 3 modifications,
- In the period 2010-2016, NIE processed more than 1200 small and medium-sized connection applications, which is approximately 200 per year. This included the full design and costing of these projects, as they do not use standard pricing. DNOs in the UK processed similar or larger number of applications over the past 10 years.

The requirement to increase ESB Networks and EirGrid resources to process more connection applications will be self-funding. If an additional 50 connection offers are processed then the applications fees, based on an average size of 5-10MW, is €1.36m per annum. This is more than adequate to provide the 4-7 additional human resources required to process these applications.

The IWFA also strongly believe that there are many process improvements that the System Operators can apply to improve the efficiency of the connection offer processes. As relatively large companies, with access to resources like ESBI, we cannot see how the resourcing of the connection offer process teams cannot be increased to manage a properly sized ECP-2 process.

3. Early Engagement

The IWFA welcomes the proposal for early engagement in the batch process between the System Operators and applicants. This was a measure proposed by the IWFA in our ECP-1 response. For projects with complex and possibly unviable connection methods, it will provide an opportunity for the developers to withdraw at an early stage in the batch process. This will allow the System Operators to concentrate their resources on preparing connection offers that are more likely to be accepted. The IWFA estimate that up to 15% of applicants may decide to withdraw their applications at this stage. This improved efficiency should also help justify having larger batch sizes.

There is a lack of detail on how the early engagement process will work. Critical to its success will be the opportunity for the applicant to receive a rebate on a substantial portion of the application fee. If there is no rebate of the fee there will be no incentive for the applicant to withdraw the application. In Northern Ireland, where NIE have an early stage engagement process, the £8k application fee was reduced to a feasibility study cost of approximately £1.5-2k.

Also critical to the success of good engagement between applicants and the System Operators is the opportunity to reduce the MEC during the ECP offer process. This flexibility can help ensure the applicant receives a viable connection offer. Reducing the MEC during the offer process is permitted in connection policy. The COPP rules include a charge of €5k/MW for reducing the MEC during the offer process. This flexibility was used during Gate 3 and its effectiveness is demonstrated by the renewable projects that had this flexibility now being connected and making a significant contribution towards the 2020 RES-E target. During ECP-1 we believe ESB Networks would not engage with applicants

that wanted to reduce their MEC. The IWFA requests that the CRU directs the System Operators to provide this flexibility during ECP-2.

The IWFA members involved in ECP-1 have been disappointed with the communication and level of engagement with ESB Networks. Generally, emails take long periods to be answered and it is rarely possible to discuss issues on the phone with ESB Networks engineers. As part of the ECP-1 decision, industry got commitments that ESB Networks would provide connection method meetings for each project. Based on the CRU ECP-1 decision and this proposed decision, the Gate 3 direction (CER/08/260) that details the System Operators approach to connection method meetings still applies. In Gate 3 applicants were generally very satisfied with the engagement and information provided in connection method meetings. The meetings were in person and the System Operators prepared presentations detailing the connection method and process undertaken to determine the LCTA/LCC connection method. In ECP-1, not all applicants were even offered a connection method meeting and in most cases it was a relatively short conference call with no formal information provided. For ECP-2 the IWFA requests that the CRU explicitly directs ESB Networks to provide connection method meetings in the format detailed in CER/08/260 (Appendix 5). The IWFA also requests that ESB Networks become sufficiently resourced to ensure timely communication with renewable applicants.

4. Planning permission for ECP-2 batches

The IWFA welcomes the continued requirement for planning permission to be able to apply into ECP-2. This will be a more logical project development model, remove speculation and ensure a more efficient use of the System Operator resources.

However, as outlined earlier, the delivery of grid connections in a timely manner remains a major concern for IWFA. It should also be noted that to receive planning consents, the developer has invested significant time and money in the project. It is therefore completely unsatisfactory for projects with planning to be substantially delayed in waiting for a connection offer. The renewable industry is resourcing itself to develop the renewable projects required to meet the interim and 2030 targets. It is therefore only reasonable that the System Operators also resource themselves to play their role in facilitating the connection of these projects. And if we are to move to an appropriate and enduring connection policy as agreed when the sector supported ECP, where receipt of planning leads directly to grid access, then this decision needs to incorporate a plan to clear the connection application queue, at the latest by the end of ECP-2. Otherwise connection remains an additional but unnecessary hurdle and source of delay and therefore cost, possibly even project failure (which does not help with national targets or the Climate Action Plan).

5. Prioritisation of ECP-2 batches

The IWFA welcomes that the CRU has included the principles to prioritise renewable projects and by planning permission grant date. These were both changes requested in our ECP-1 submission.

However, we are concerned that renewable priority only applies to part of the batch and that it is proposed to discriminate in favour of large renewable projects. Apart from our serious doubts about discriminating at all, doing so in favour of large renewable projects

amplifies our deep concerns about the proposal to only process 50 projects in each batch. Any new small or medium size windfarm that received planning recently, or will do so in the coming years, cannot expect to have its application processed in any of the three ECP 2 batches. Small and medium sized wind-farms were responsible for starting and sustaining the development of the modern renewable industry in Ireland. These wind-farms have also made a significant contribution towards meeting the 2020 RES-E targets, never mind assisting with public acceptance. It is completely unacceptable that the CRU is designing a connection policy that will effectively exclude the participation of new small and medium sized wind-farms.

6. Non-batch process

The consultation includes a proposal to continue with a non-batch process but limit it to generators less than 500kW, auto-producers, DS3 trial technologies and community projects. The IWFA welcomes the continued inclusion of auto-producers in the non-batch process, and that the same planning requirement applies to all generators, except community projects. However, the IWFA does have major concerns with the capacity and application caps included in the proposed decision.

The 500kW cap is extremely low. As included in our previous connection policy responses, we had suggested that the threshold for non-batch be set at 2.5MW for generators. Wind turbines are now generally 2-3MW in capacity, and the typical onshore unit today is 2.3MW. It is only reasonable that there should be a simplified connection process for small-scale generators, such as single turbine projects.

The System Operators' proposals to limit the number of applications under the non-GPA process to 30 per year could politely be described as 'inadequate'. Maintaining the limit of only processing one application per 110kV node is also completely unreasonable. As mentioned earlier, NIE has over 1200 contracted small-scale generators. These were almost all processed over a 6-year period, approximately 200 per year. NIE simultaneously processed multiple applications at the same 110kV node and in parallel with a substantial number of large-scale applications. Similar connection processes have been in place across Europe to manage the substantial increase in the demand for embedded generation.

Ireland has a relatively low level of small-scale generation connected to-date. Falling technology costs and the increasing demand from consumers for renewable and auto-production generation will without doubt see a substantial demand for small-scale connections in the near future. We understand that, currently, many auto producers use the zero export rather than the connection process due to the major delays and the lack of resourcing in the non-batch process. Opting for zero export will result in the constraining down of the renewable generator at times. The experience of IWFA members is that processing applications in the non-batch process can take in excess of 1 year. The IWFA suggests that the CRU direct the System Operators to prepare their processes and resources to meet for the upcoming increase in small-scale connections, rather than trying to put in place inappropriate limitations in connection policy on the capacity or number of small-scale applications that can be processed per annum. As required in the Government Climate Action Plan, a fit for purpose connection process is required. This should apply to all renewable generators and not just large renewable generators.

It is important that the early engagement process also applies for non-batch applications and that these applicants are also provided with connection method meetings during the connection offer process.

7. Community-led renewable projects

The IWFA supports the prioritisation of community projects in the connection offer process. We would agree that projects that meet the community requirements are allowed to apply for a grid connection before receiving planning permission.

However, the proposals suggested by the CRU in the proposed decision are unclear/underdeveloped. As discussed at the recent industry workshop, it appears that community projects can apply for a grid connection, engage with ESB Networks on the connection method and cost, but until the project receives planning it will not receive a connection offer. Therefore, there would be no certainty on the connection method and cost during the planning process, as other projects could be allocated the grid capacity through the batch or non-batch process in the intervening period. It was also suggested at the workshop that full application fees would have to be paid. For a project of 1-4MW the application fee is €18,201 and for a 4-10MW project the application fee is €36,838. It appears that what is being proposed will initially be a very expensive grid feasibility study, and only if the project receives planning and the grid capacity remains will a viable connection offer be issued.

The IWFA would propose that the community applicant secures the grid capacity for a period. The period should provide reasonable time to develop the project to planning permission stage, possibly varying depending on the scale and the renewable technology. There should be appropriate milestones to be achieved by the project to maintain the grid capacity, for example submitting a planning application and receiving planning consents. It would also be important that only projects that continue to meet the definition of community can progress through this process. Before applying, the community would have to have secured the land required for the project, as required for completing a connection application. Pre-application engagement between the community and ESB Networks should also be facilitated, so that the available grid capacity can be identified at an earlier stage. The proposed ESB Networks heat maps may also assist with this early engagement. The CRU and ESB Networks should also review the level of fees required, as the full application fee should not be required to commence the process.

8. Non-firm access

The consultation proposes to continue to issue connection offers with non-firm transmission access in ECP-2, while the policy for calculation and allocation of firm access will be considered in parallel. The IWFA is very concerned that there is no defined timeline of when this policy review will be started and completed. It does not appear to be in the 2020 CRU work plan. IWFA note that shallow connection policy with the on-going completion of deep reinforcements is a fundamental principle of the all-island market. In the high-level SEM design (AIP/SEM/42/05) it is stated:

"It is proposed that a shallow connection policy is adopted in the SEM, with a 'deep' reinforcement timeframe made known to the generator as part of the connection offer".

IWFA strongly suggests the ATR and FAQ analysis should be starting early in the ECP-2 process. The information will likely be required later in the project financing process and if the ATRs are not identified, then work is clearly not even starting on the delivery of the transmission works to minimise constraints for ECP-2 generators. This issue again harks back to the core problem IWFA has repeatedly highlighted, which faces the planning-led approach - delivery of grid access sufficient to enable financing of projects before planning expiry, and having commitments on firm access form part of that requirement.

9. Application fees

The CRU approved major increases in application fees for ECP-1 and it is proposed that these will continue for ECP-2. For example, for a 4-10MW generator the fee increased from €27,276 to €36,836, a 35% increase. However, the level of customer service ESB Networks provided has decreased substantially from Gate 3 to ECP-1. It is completely unacceptable for ESB Networks to have some of the highest connection application fees in Europe, while providing extremely poor service.

In Britain where there are no application fees, the DNOs are obviously motivated to have an efficient connection process and to provide developers with the necessary information on the viability of their grid connection. This includes system information for developers to complete their own analyses, feasibility studies, pre-application discussions and flexible connection offer processes. In contrast, in ECP-1 and ECP-2 there are very high application fees. ESB Networks provides only limited system information and there are no opportunities for informal discussions with ESB Networks before applications are submitted. This is not a customer-led approach and results in a costly process for developers and an inefficient process for ESB Networks and EirGrid. To address the major concerns with the connection offer process, the IWFA recommend a fundamental review of the offer process, similar to the IBM Simpler review carried out in 2018/19 on the wider ESB Networks connection process.

10. Shared assets

The IWFA continues to be very concerned by the introduction of bonding for shared non-contestable assets in ECP-1, now set to continue into ECP-2. Feedback from IWFA members with ECP-1 projects with shared non-contestable assets, is that the provision of the shared bond is a major issue for progressing projects.

We continue to strongly believe that the sharing of connection assets underwritten by the consumer had been very successful for the consumer, the system and developers. It was started with the Grid Upgrade Development Programme (GUDP) in approximately 2002 and then the GPA in Gates 1, 2 and 3. Sharing connection assets is not without challenges and it does make the development process for System Operators and developers more complex. However, there is strong evidence for the benefit of the consumer underwriting shared assets based simply on the volume of connections that GUDP and Gates 1, 2 and 3 have delivered. The additional capacity created with shared assets in GUDP or early Gates has generally been used by generators connecting in later Gates, so that much of the surplus capacity carried by the consumer has subsequently been used; the risk was worth carrying. Available capacity in shared assets is a key-criterion when renewable developers are identifying sites for new projects. It is very likely that any capacity that still exists will be used in the upcoming batches. The Clustering approach in Northern Ireland that

includes the sharing of 110kV connection assets has been similarly successful. The GUDP, GPA (Gate 1-3) and the Clustering approach all have the principle of the consumer underwriting the cost of the shared assets. The negative impact of early bonding of shared assets cannot be understated and IWFA strongly opposes the continuation of this policy.

11. Longstop dates

IWFA are very concerned that the ECP-1 decision and the ECP-2 proposed decision have not taken account of the fact that support for renewables is generally moving towards schemes based on competitive auctions. There are two main aspects of this new support approach that need to be considered by the CRU in its decision on ECP-2. Firstly, competitive auctions are required under EU state aid rules (except for some smaller projects), so connection policy will have to be designed with this auction approach to support schemes in mind; Ireland cannot avoid an auction-based approach. Secondly, competitive auctions will be good for the consumer, so any connection policies that support projects being able to competitively compete in auctions is good for the consumer. However as stated already, linking the two processes too strongly is not a good idea, also because up to 15% of capacity is targeted to come through Corporate PPAS and not RESS; ECP should keep well ahead of RESS.

The continuation of shorter longstop dates is one example of proposals for ECP-1 and ECP-2 that have not considered the new auction process. Auctions by their nature will have 'winners' and 'losers', otherwise they are not genuinely competitive. The losers should be given the opportunity to improve their bid for the next auction; for example, by reducing the capital or financing cost of the project. Projects that are included in ECP-1 and 2 will have already shown substantial project commitment. This substantially reduces any connection risk to the consumer compared with Gates 1-3, when no such commitment was required. IWFA strongly argue that having already shown this increased commitment and considering the uncertain nature of the auction process, longstop dates should be increased from 2 year to 3 or 4 years. The proposal to continue with 2 years is showing a complete lack of understanding of the new support scheme approach for renewables. IWFA respectfully suggests that the CRU reconsider its proposals and in fact considers extending the longstop period to 4 years.

12. New ESN planning standards

IWFA generally welcomes the changes to the ESN planning standards. However, they should only be viewed as the first steps in moving towards a smarter distribution system. In a high RES-E system, a smart transmission and distribution system will be critical. This transition to a smarter distribution system is also very much within the requirement to provide a '*fit for purpose*' connection process.

IWFA are concerned about how the new planning standards will be applied. ESN will not commit to applying the new standards to modification of ECP-1 connections. This will result in increased connection costs for ECP-1 projects. It could also result in some ECP-1 projects having to reapply through the ECP-2 process. This would be an inefficient use of all developer's and System Operator's resources and cause delay in projects being able to compete in the RESS auctions. IWFA request the CRU direct ESN to apply any new standards to any projects that could benefit from the changes, both in ECP-2 and in ECP-1.

13. Release of Capacity

The IWFA very much welcomes the CRU's proposal to have another release of capacity. This will allow capacity to be released for use by ECP projects, and will likely result in some lower cost and timely connections for renewable projects. Similar to clarifications on the last capacity release decision (CER/16/284), the IWFA would strongly request that capacity release also applies to partial release of capacity. It should also apply to all levels of MEC and not just projects with MEC greater than 5MW and for capacity release above 3MW, an unfortunate limitation of the 2016 capacity release. There are many projects with MECs higher than the installed capacity and this would be the correct time to align the MEC and installed capacity. Although some of this capacity may seem immaterial, but with the connection of more and more small-scale generation, any excess MEC will negatively impact on small-scale generation.

Similar to our early comments on longstop dates, with competitive auctions for support for renewables, there needs to be a route for renewable projects that have failed at auctions to release their grid capacity and make it available for other projects. The IWFA would at this stage highlight that future capacity release will be required to ensure the efficient operation of the connection offer process.

14. Node Assignment

The Gate 3 node assignment rules were used in ECP-1 for the high level determination of connection node assignment for each project. IWFA strongly believes that it is necessary to review the use of these node assignment rules for ECP. Since Gate 3, the transmission network has become saturated in some areas. There are also increasing environmental and planning requirements on wind farm developers for connection assets. Gate 3 node assignment rules could assign a project to be connected to a saturated part of the transmission network. The connection offer process, including the node assignment rules, also need to be improved to provide developers with earlier and greater certainty on the connection assets that need to be considered as part of the windfarm planning permission. We request that the System Operators consult on the node assignment rules for ECP-2 in Q1/Q2 2020.

15. Connection charging policy

IWFA understands that there are proposals to review connection charging policy, and we welcome this idea. The current Shallow/Deep policy is the cause of much of the complication in ECP and generation projects generally. If System Operators paid for what they will own, and (if necessary) projects could own and pay for the dedicated line, then the whole process would be hugely simplified, quicker and cheaper. And as argued convincingly by Economist Kevin Hannigan 10 years ago, it would also be a lot more efficient for Ireland's economy².

² Efficient Funding of Transmission Network Connection Costs, KHSK, for NOW Ireland, Jan. 2010