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17th January 2020

Mr Stuart Coleman
Commission for Regulation of Utilities
The Exchange,
Belgard Square North,
Cookstown,
Dublin 24
(by email to electricityconnectionpolicy@cru.ie)

Re: MREF Response to the CRU's ECP2 Proposed Decision Consultation - CRU/19/143

Dear Mr Coleman,

The Micro-Renewable Generation Federation (MREF) welcome the opportunity to respond to the CRU consultation on the proposed ECP-2 decision.

Members of MREF are generally involved in the connection of micro and small-scale solar generation on domestic, commercial and industrial premises. This response is focused on the proposals for the non-batch process included in section 2.8 of the CRU proposed decision. MREF are separately engaging with ESB Networks on the technical requirements for the connection of micro and small-scale generators and in relation to the operation of the 'Inform and Fit' and 'Zero Export' connection offer processes.

We would also welcome the opportunity to engage with the CRU on the various aspects of the enabling framework for microgeneration as per Action 30 of the Governments Climate Action Plan. MREF can bring the practical experience of developing, installing and operating micro generation in Ireland and in other jurisdictions.

MREF's members and their advisors experience of the non-batch process and the previous non-GPA process is very disappointing. Members experience is that it can often take more than 9 months to receive a connection offer for export capacity through the non-batch/GPA process. That is if the application is not queued behind other applications at the transmission node. In these scenarios it can take years to receive a connection offer. This appears to be demonstrated by the CRUs comments in the proposed decision that connection applications submitted to the non-GPA process in 2018 remain to be processed.

In comparison, a zero-export application is generally processed in a timely manner. However, for zero-export sites any excess generation not used on site must be constrained back by the micro generators control system. This results in the loss of renewable energy and potential revenue. When faced with the options of a zero-export offer and connecting the renewable generator project in a timely manner, or applying for export capacity and having no confidence on the timeline to receive a connection offer and install the renewable generation, MREF's members are invariably deciding to proceed on a zero-export basis. This provides an explanation to why only one non-batch application was submitted in the first half of 2019. MREF does not believe that it is fair, reasonable or sustainable for all small-scale solar installations to have to use the zero-export offer process due to the failings of the non-batch process. It is likely that more and more auto-production projects, without continuous onsite demand, will need export revenue to make the projects viable. It is contrary to all good environmental, engineering, and businesses practices to constrain back renewable generation due to the unreliable, poorly resourced and inefficient non-batch process.

MREF is very concerned that the non-batch process may have a limitation as low as 15 applications per year, when community project priority is considered. With the recent unprecedented focus on climate change, MREF strongly believe that there is a requirement for key industry stakeholders to step up to the new challenges associated with the decarbonisation of the Irish energy sector. In particular, ESBN are a critical stakeholder that need to make this step change. We request that ESBN and the CRU acknowledge the need to move away from determining the capacity to process applications based on previous experience and instead design and resource a process that can satisfy the requirements of the renewable industry.

MREF request the following improvements are made to the non-batch process:

- ESBN carry out a substantial review of the non-batch process, similar to the IBM Simpler review carried out for ESBN on the connection delivery process in 2018/19. MREF strongly believe that there can be significant efficiency improvements made from this type of review. MREF would welcome the opportunity to be involved in this process review.
- ESBN design and resource the connection offer process team to be able to process non-batch applications in a three-month period. This is the same timeline NIE and British UK DNOs have for the processing of all connection applications. Providing connection offers outside of this timeline should only be the exception and with approval from the CRU.
- ESBN process multiple connection applications per transmission node at a time. This is a restriction that did not exist in Britain and Northern Ireland. Over the past 10 years hundreds of applications were processed by each DNO per annum. Maintaining this restriction will result in the risk of a non-batch application taking years to be processed.
- Similar to the proposed ECP-2 batch process, there should be the opportunity for early engagement in the application process between ESBN and the applicant. This should allow generators the opportunity to withdraw the application and receive a rebate of the application fee if the connection is deemed unviable at an early stage.

- Greater network information should be provided by ESBN to allow for early identification of network capacity limitations, for example through the provision of technical network information and heat maps.
- ESBN should also provide regular customer clinic days similar to EirGrid. This would allow new applicants to engage directly with experienced ESBN engineers and discuss the connection process and any potential network capacity limitations in the applicant's area.
- ESBN need to resource the generator connection department so that queries received by email by phone call can be processed in a timely manner. Currently most emails go unanswered for long periods, if at all, and it is rarely possible to discuss in person or on the phone with ESBN on a new or ongoing application.

MREF are currently engaged with collecting information from its members on the potential number of projects per annum that could apply through the zero-export and non-batch processes. When the information becomes available, MREF propose to share it with the CRU.

MREF are grateful for the opportunity to respond to the consultation afforded by the CRU and looks forward to meeting the CRU to discuss this response and taking part in any future industry workshops on the ECP process.

Your Sincerely,

On behalf of the Micro-Renewable Energy Federation



Pat Smith

MREF Chairperson

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