

January 24, 2020

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

**Re: Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision CRU/19/143 2019**

Dear Sir/Madam,

I write to you on behalf of Natural Forces in response to your request for consultation regarding the Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision Paper CRU/19/143 2019.

Natural Forces has been a leader in community projects in Canada over the last 9 years. In that time, we have completed 11 community projects and have a further 4 in construction with completion scheduled for the end of this year. 900 individual citizens and 20 Indigenous communities have invested with Natural Forces in these projects based on the environmental benefits, the local economic opportunity and the financial returns. I attach in Appendix 1 a list of our community projects.

We have reviewed the proposed decision paper and have identified a number of areas which required some further consideration and/or clarification;

**ECP-2 Timelines & Batch Sizing**

The proposal of regular batches in ECP-2 are supported, however we feel that further work is required around the size of the batch and the timeline for processing them. Specifically;

1. ECP-2 Batch Timelines - it is proposed that ECP-2 will open in Q4 2020. Based on experience, we are concerned that the batch may not open until Q1 2021. A delay to the commencement of the ECP-2 batch will have a knock-on effect on all consecutive batches. Therefore, we would suggest that the application process starts as soon as possible i.e. in Q2 2020 at the time when all outstanding ECP-1 offers have been issued, thus allowing the System Operators to begin processing the offers in Q3 2020.
2. As seen with ECP-1, there was a significant delay issuing connection offers, it is recommended that ESB networks and EirGrid increase their resources to ensure efficient processing of all ECP-2 applications.
3. Currently the ECP-2 batch will consist of 50 connection offers per year, with 150 offers being processed over a 3-year period. We note that the CRU may review the size of the



batch's bases on this consultation. We feel that the 50 offers per batch may be too small and recommend that a more reasonable target would be 75 offers per batch.

### **Batch Prioritisation**

We strongly disagree with the approach of prioritizing large renewable projects over small and medium scale projects. It is felt that all generation has a role to play towards achieving our 2030 targets.

However, as noted above. By increasing the batch sizes from 50 to 75, this would allow larger generation projects grid access without adversely impacting the small and medium scale projects obtaining an grid connection offers.

### **Community-Led Renewable Energy Projects and Non -Batch Offers**

Having previously had the opportunity to meet with the team in the CRU on 15<sup>th</sup> of November to discuss the opportunities for community energy developments, where were afforded the opportunity to outline our experience in the Canadian market, we are encouraged to see specific details for the community lead project.

We consider that the process is appropriate and believe the 30 non-batch offers with 50% allocated to community lead projects is also appropriate.

### **Offer Capacity on a Non-firm Basis**

We urge the CRU to consider developing mechanisms whereby if a project is delayed connecting to the electricity network due to incomplete/delayed associated shallow works, distribution deep reinforcements, short circuit works and other necessary works, which a deemed a direct result of the SOs programme failures, that penalty's be enforced on the SOs.

### **Application costs**

ECP-1 saw a major increase in the cost associated with grid connection application fees, these fees have been brought forward into ECP-2 with no revision. Based on the level of customer service provided by the System Operator in ECP-1.

We would recommend a fundamental revision of the offer process and the resources available to applicants from an early stage in the application process.

### **Capacity Release**

We welcome the CRU's proposal for another capacity release. With capacity being released there will be increase capacity available for use by ECP-2 projects, which will likely result in some lower cost and timely connections of renewable projects.

Thank you for the opportunity to provide comment to the terms and conditions. I believe that they represent the way forward for the renewable energy industry in Ireland. I am available at your convenience should you wish to discuss any of the matters raised herein.



Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Brereton', with a large, stylized flourish at the end.

John A. Brereton

Director

Natural Forces Renewables Ireland Ltd.



## Appendix 1 – list of Natural Forces community renewable energy projects

Project	Location	Size & Technology	Community Partner	No. citizen investors	Status
<b>Fairmont</b>	Nova Scotia	4.6 MW Wind	35% owned Wind4All	158	Operational 2012
<b>Hillside</b>	Nova Scotia	4.0 MW Wind	58% owned Wind4All	412	Operational 2014
<b>Gaetz Brook</b>	Nova Scotia	2.3 MW Wind	Communities		Operational 2013
<b>Auld's Mountain</b>	Nova Scotia	4.6 MW Wind	25% owned Wind4All Communities II	270	Operational 2015
<b>Barrachois</b>	Nova Scotia	4.6 MW Wind	42% owned Wind4All Communities III	264	Operational 2015
<b>Gardiner Mines</b>	Nova Scotia	5.4 MW Wind	89% owned Cape Breton University	N/A	Operational 2015
<b>Auld's Mountain II</b>	Nova Scotia	2.3 MW Wind	25% owned Wind4All Communities III,	Wind4All Communities III:	Operational 2016
<b>Amherst</b>	Nova Scotia	6 MW Wind	25% owned Pictou Landing First Nation, 25% owned Confederation of Mi'kmaq Nations of Nova Scotia (BMW)	220 Pictou Landing: 485 members BMW: 16,268 members	Operational 2016
<b>Oinpegitjoig</b>	New Brunswick	3.8 MW Wind	51% owned Pabineau First Nation	280 members	Operational 2020
<b>Wocawson</b>	New Brunswick	20 MW Wind	51% owned Tobique First Nation	1,948 members	In construction: Scheduled COD 2020
<b>Zonnebeke</b>	British Columbia	15 MW Wind	15% owned West Moberly First Nation	305 members	In construction: Scheduled COD 2020
<b>Sukunka</b>	British Columbia	15 MW Wind	85% owned Saulneau First Nations	1,073 members	In construction: Scheduled COD 2020
<b>Pesakastew</b>	Saskatchewan	10 MW PV	51% owned George Gordon & Star Blanket First Nations	3,752 members GGFN, 175 members FN	In development: scheduled COD 2021