

BY EMAIL: Electricityconnectionpolicy@cru.ie

Cahir O'Neill, Electricity Connection Policy,
Commission for Regulation of Utilities,
The Exchange, Belgard Square
North, Tallaght,
Dublin 24, D24 PXW0

24th January 2020

RE: Enduring Connection Policy Stage 2 – Proposed Decision

Dear Sir or Madam,

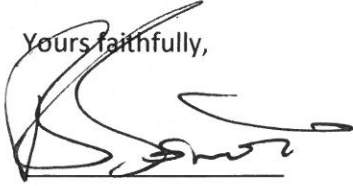
As a member of the Irish Solar Energy Association (ISEA), we share the views, and in some instances concerns, being expressed by ISEA in its submission of today's date to your Department.

Our key points are as follows:

- The policy certainty around renewable generation is now unequivocal with the 70% RES-E target requiring very significant volumes of renewable energy. Renewable projects should be encouraged and supported through the grid connection process, and volumes processed should not be artificially limited as suggested in the Proposed Decision. The Enduring Connection Policy should allow ALL consented renewable energy projects move through the connection process in a timely manner. Limiting processing volumes based on historic resource levels in the System Operators makes no sense, is not in the best interest of consumers and contradicts Action 19 of the Climate Action Plan.
- Public interest is served by ensuring as many projects as possible can compete in auctions. It is contradictory for the CRU to propose connection policy which limits auction participation while simultaneously being responsible for RESS Competition Assessments to ensure sufficient competition for auction award volumes.
- The 70% RES-E target cannot be achieved by a single renewable technology and will require renewable generation across all time periods. It is not the role of the CRU to infer the optimum mix of technologies and use connection policy to prefer one form of renewable generation over another as per the Proposed Decision.
- The proposal to prioritise connections for larger renewable energy projects over smaller projects is discriminatory and misguided. The CRU would be better served by ensuring the System Operators provide the resources necessary to process all renewable projects that come through the planning process in a timely manner. The volume of renewable energy projects will continue to increase over time and connection policy should be future proofed to ensure there are no barriers to realising these projects.
- Section 9 of the 1999 Act specifically requires the CRU to "carry out its statutory functions in a manner which does not discriminate unfairly between relevant stakeholders", "promote competition" and "promote... the use of renewable ... forms of energy". Certain aspects of the Proposed Decision runs contrary to these aims and we strongly recommend the CRU reconsider these aspects. We believe that increasing Solar auction volumes will improve the delivery of RESS-1 projects and decarbonise the economy, due to the nature of Solar projects being delivered in relation to other renewable technologies. We also believe that by altering the winner determination rules, Solar would increase cost competitiveness with other eligible technologies within the RESS-1 auction. In particular we feel that the proposed lack of indexation is unwise and discriminatory to solar due to our larger fixed costs relative to other technologies.

We fully endorse and support the recommendations being put forward by ISEA in its submission as a means of dealing with these issues.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'D. Smith', written over a horizontal line.

Director of Corporate Development