

ECP-2: Proposed Decision

Quintas Energy Response



Quintasenergy
MANAGING POWER

ECP-2: Proposed Decision

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Introduction

Quintas Energy welcomes the opportunity to respond to the consultation on the Enduring Connection Policy – 2: Proposed decision.

Quintas Energy provides Asset Management and Advisory Services to investors in the renewable energy sector. Our understanding of renewable energy in the countries where we are active, combined with our unique Engineering, Accounting, Legal and Advisory skillset gave us extensive experience in the sector.

As a company providing its services to more installed power across more markets than any other company in the sector, Quintas Energy is proud to play our part in the contribution and the achievement of Ireland's target on generation of electricity from renewable sources.

Quintas Energy acknowledges the importance of the European Union's Clean Energy Package and the CRU's strategic priority of delivering sustainable low-carbon solutions, and our comments to the ECP-2 Proposed Decision are in line with them, seeking to achieve their renewable energy ambitions through a connection policy that facilitates the changing needs of electricity generators and customers.

Comments

Do stakeholders agree with the CRU's proposals for ECP-2 batch and non-batch processes?

We generally agree with CRU's proposal and welcome the suggestion to have regular batches of applications processed, which will promote synchronisation with Renewable Energy Support Scheme, and therefore, pave the way towards government renewable energy ambitions.

Nevertheless, Quintas Energy works in a proactive manner and the comments below outlines some considerations for the implementation of ECP-2.

Connection Offers Target

There are a number of factors which suggest that limiting the number of projects to 50 is overly restrictive. If Ireland is to meet its target of 70% renewable energy by 2030, an ambitious timescale, it will need to accelerate development considerably.

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There is recent evidence that system operators are capable of processing, in parallel, around 100 offers a year. We would strongly suggest that the number of offers is increased to at least this level, to allow for more diversity in the market and fulfil related sustainability criteria. Smaller projects are a feature of renewable energy, and indeed a benefit in terms of limiting impact on the visual environment and keeping production local.

We note that EirGrid stated in their response to the ECP-1 Proposed Decision Consultation that they were open to a moderate increase in batch size if that was generally supported across the industry.

Solar batch

In their recent consultation for the Terms and Conditions for RESS, DCCAE include a grid connection offer as one of the requirements to be eligible to compete in future RESS auctions.

RESS is set up so that there will be a separate auction for solar projects, aiming for 300 GWh/year in RESS-1. That means that solar projects up to a total of 311MW will have been granted a connection offer before the auction takes place.

The CRU proposes giving the first 25 offers to renewable energy projects on the basis of project size. This will be very likely to result in solar projects being excluded entirely from the successful projects, given the larger size of wind energy projects. This would undermine the government's stated aim of ensuring diversity of energy supply.

CRU aim to facilitate developers expecting to bid in RESS auctions over the next years with ECP-2 batches, yet the current prioritisation rules would effectively prevent solar projects getting a connection and, therefore, being eligible to compete in RESS auctions. It would also send the wrong message about energy priorities and, in the medium- to long-term, potentially discourage investment in solar projects.

Quintas Energy recommends ring-fencing a batch of offers specifically for solar projects, which would help ECP with RESS and work towards achieving the government's energy policy objectives.

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Do stakeholders agree with the proposed final opportunity for capacity release and the terms on which it will be available?

Quintas Energy welcomes this proposal and see no issues with the implementation process. We would, however, suggest that the capacity released during the one-month window be included in the next ECP-2 batch of connection offers.

Given the urgency of the 2030 target, we see no reason to hold this capacity in reserve. The more investors, bidders and potential projects involved, the higher the probability of identifying the best possible quality of energy production and achieving the government's overarching objectives.

Contact Details

Many thanks for your consideration of our input. Please do not hesitate to get back to us in case you have any questions or comments.

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