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24th January 2020

Emailed to: Cahir O'Neill, Stuart Coleman – Electricityconnectionpolicy@cru.ie

Dear Cahir and Stuart

Re: RES Limited Response - Consultation on Enduring Connection Policy Stage 2 – Proposed Decision

RES is the UK & Ireland's largest independent renewable energy developer with interests in energy storage, onshore wind, wave and tidal, offshore wind, solar and demand-side response. RES is at the forefront of innovation and design around the world, and now employs over 1000 people and has developed/built over 10,000MW of wind energy assets.

Since developing our first onshore wind farm in Ireland in the early 1990s, RES has subsequently developed and/or constructed 22 wind farms across the island totalling 318MW. RES currently operates over 118MW of wind capacity and has secured planning permission for a further 59MW under/awaiting construction and has 81MW in the planning system.

RES is one of the world's leading independent energy storage developers, with a global energy storage portfolio totalling more than 240 MW (275 MWh), providing multiple grid services. RES was identified by Navigant Research as one of the leading utility-scale energy storage integrators.

Based in Larne, County Antrim, RES' Ireland team comprises 20 staff covering environmental, planning, engineering, technical, legal, commercial, project management, construction, operations and administration disciplines.

RES is a member of the Irish Wind Energy Association (IWEA) and the Irish Solar Energy Association (ISEA).

This consultation response is not confidential.

We welcome the opportunity to provide comments to ESB Networks Public Consultation on the Smarter HV and MV Customer Connections Project which was published on 8th November 2019. The proposals represent a positive development towards smarter grids which will facilitate the achievement of the government's Climate Action Plan goals by unlocking further grid capacity for distribution connected renewable generation.

1. ECP 2 Batches Timelines

We agree with proposals to open an ECP-2 batch in each of the three years starting from 2020 as this gives developers better visibility on when projects in their development pipelines have opportunities to enter the grid connection process. For better effectiveness we propose that the application processing timelines be fixed to 12 months duration from start to finish. We are of the view that this can be achieved with appropriate resourcing and it would greatly improve the chances of adhering to the timelines. If necessary, any dependences with RESS auctions can be removed. Giving greater focus to maximising number of projects with connection agreements will facilitate more generation projects to participate in the next available auctions.

2. Number of applications in each batch, prioritisation criteria and enhanced early engagement

The proposed decision is to limit the number of offers in each batch to 50. As IWEA members we have participated in discussions on the suitability of this limit and agree with the IWEA proposal to increase this to 125 applications per batch. We are of the view that limiting batches to 50 is not supportive enough of the governments Climate Change targets but rather creates bottlenecks that suppress the number of projects eligible to participating in RESS Auctions, thereby decreasing competition to the detriment of the electricity consumers.

We agree with the principle of prioritising large renewable energy projects based on the rationale that these would facilitate achievement of the 70by30 national targets. We however would like to see storage being prioritised as it has a significant role to play in facilitating renewable generation. As currently proposed it is hard to see any significant storage applications making it into the batches.

We support enhanced early engagement before the batch process to allow applicants to develop projects and obtain planning consent based on firmer grid connection assumptions. We must point out that this can only work if the System Operators are adequately resourced and our expectations would be that System Operators are able to provide high level feasibility studies if requested prior batch opening, something they do not currently provide. More information regarding grid capacity needs to be published and availed to facilitate this provision of information to developers at early stage.

3. Planning Permission requirement

We support the requirement for planning permission to enter the ECP-2 batches. This removes speculative applications and ensures System Operator resources are efficiently spent on progressing real and more ready projects.

4. Security for shared assets' costs for projects

We support the IWEA response questioning the need for these securities. If the shared asset bonds are maintained, we suggest that clearer policies be developed around shared asset bonds. It is not clear for instance, what happens when a project drops out after submitting shared asset bond and as a result the upgrades are no longer required. In that case, are the upgrades

(i) still get progressed needlessly or (ii) get cancelled and the bond and the bond released? In the case of (i), if there is a subsequent project that connects and benefits from connection assets funded by the earlier party that cancelled its contract, how does the rebating system work?

5. The schedule of application fees remains as per ECP-1.

The proposed decision not to increase the application is welcome as the fees are already at fairly high levels.

6. Offer capacity on a non-firm basis.

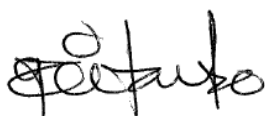
Action Number 17 of the government Climate Action Plan under Regulatory Streamlining of Renewables and Grid Development seeks to “Ensure that ESB Networks and EirGrid plan network and deliver on connecting renewable energy sources to meet the 2030 70% RES-E target”. If grid capacity continues to be offered to a non-firm basis, this will mean that increasing volumes of renewable generation will be lost due to increasing levels of grid constraints. This not only negates the achievement of the 2030 targets but renewable projects will increasingly find it harder or more expensive to secure funding, with result that renewable investment will be stifled. We however understand that there is an expected consultation on firm access on the cards. We suggest that this consultation be commenced without further delay in order settle this issue sooner rather than later.

7. Projects contracted pre ECP-1 to be allowed to terminate connection agreements and release grid capacity

We support the proposal to allow all projects contracted pre ECP-1 an opportunity to terminate their connection agreement and release their full contracted MEC on the terms and conditions specified in CER/16/284. It is desirable to undertake any measures that can potentially create more capacity for ECP-2 applications.

We have offered the above comments in a spirit of positive cooperation and we will be happy to clarify any of the points raised in our consultation response.

Yours faithfully



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