



**Commission for Regulation of Utilities (CRU)  
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**Date**  
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Dear All,

ScottishPower Renewables (SPR) is part of Iberdrola, one of the world's largest utilities and leading wind energy producer. ScottishPower Renewables is responsible for progressing the deployment of onshore wind projects in the UK and Ireland, and offshore windfarms throughout the world, managing the development, construction and operation of all projects.

We currently have over 30 operational windfarm sites with over 2GW installed capacity throughout the UK and Ireland, including our share in the 389 MW offshore windfarm West of Duddon Sands. In addition, we have a substantial development portfolio of onshore windfarms in the UK and Ireland and offshore wind projects in the East Anglia Zone, including the 714 MW East Anglia ONE project which is currently under construction. We therefore welcome the opportunity to respond to the consultation on the Proposed Decision to the Enduring Connection Policy Stage 2 (ECP-2).

### **Proposals for ECP-2 batch and non-batch processes**

We welcome the principle of having a batch process of offers on a yearly basis up to 2022 in order to support efficiencies for progressing them in appropriate timelines to align with the RESS auctions. However, we believe that targeting 50 connections per batch is a modest target based on the capabilities that the current system has demonstrated. The total ECP-1 batch had approximately 140 offers to be processed in less than 2 years. We believe there is some headroom to improve the batch target to ensure the connection queue moves forward to the necessary pace in order to cope with developers' interest to deploy renewable assets in Ireland.

In general, we agree with the offer prioritisation proposal although we have concerns about the way new technologies, that would be able to provide DS3 services such as battery storage, can achieve route to the network via a prioritisation based on GWhrs and early planning. The prioritisation proposal would place storage at the back of the queue which could threaten renewable system integration, increasing the probability of curtailments and constraints that would create a detrimental effect on the financial viability of renewable projects on the Island.

We believe that facilitating the development of hybrid technology projects (Windfarm+Storage and/or Solar+Storage), through a suitable policy and regulatory framework, that allows participation in the ECP-2 process over a level playing field is

necessary. This approach could improve the ability of the network operator to integrate renewables and optimise the existing and potential grid infrastructure to accommodate new projects.

### **Long Stop Dates**

We believe shortening and enforcing long stop dates could be in detriment of competition in the RESS auctions, therefore decreasing the possibility delivering cost-effective electricity to the customers. Long stop dates should be a tool for the system and network operators to ensure that projects, that are not able to demonstrate progress, are terminated and are not in a position to delay others into get to their energisation stage.

We invite CRU to provide more flexibility in regard to long stop dates as there is a clear possibility that projects that are not successful in one of the RESS auctions could then look ahead for other route to market opportunities inside, or outside, the RESS auction framework.

### **Firm/non-firm Capacity**

SPR is concerned about the level of risk that having a non-firm access to the network represents for the viability of projects based on the curtailments and constraints projections that are being considered across the industry. This creates a significant level of uncertainty for project business cases that could impact the outcome of the RESS auctions, compromising the delivery of the renewable targets for Ireland. We believe that the regulator should endeavour to ensure that firm access to the network is offered to generators and/or dispatch down compensation is clarified so the risk is not solely on the project developers' shoulders.

We would welcome the ECP-2 consultation to consider how future renewable projects will be able to access firm access to the network and how the risk of no compensation for dispatch down can be addressed for not compromising the development of projects due to lack of certainty.

### **Repowering**

SPR is currently looking to repower our existing fleet across the island of Ireland. The implications around losing firm access and to be exposed to curtailments and constraints make repowering these projects very challenging. We believe that without the possibility to offer firm access and therefore, not allowing for dispatch down compensation, will disincentive developers to pursue solutions that would otherwise bring short term benefits in the path to meet decarbonisation targets.

### **Capacity Release Opportunity**

We support the capacity release opportunity and encourage the regulator to go beyond bespoke window opportunity calls. By implementing a mechanism to ensure that projects, with ongoing grid connections offers, that wish to terminate, would make capacity available as soon as possible benefiting projects committed to progress and with a clear route to market. This will support the alleviation of the queue and permit an optimal utilisation of the scarce network capacity in Ireland.

We believe that offering refund options should be always an option when it is demonstrated that there hasn't been demonstrated spend on activities related to connect the projects. Transparency on those activities being undertaken on the back of the stage payments are critical to promote healthy engagement and communication between parties, improving the expectation management from both sides. CRU should advocate that incentives are in place



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to ensure investments are made using available funds appropriately by the Transmission and Distribution Network Operators.

We would welcome discussion on any of the above and if you have any questions in relation to this response, please do not hesitate to contact me directly.

Yours sincerely

**Ricardo Da Silva**

**Grid & Regulation Analyst**