



Shannon LNG  
Listowel Business Centre  
Clieveragh Industrial Estate,  
Listowel, Co. Kerry.

Date: 20<sup>th</sup> Jan 2020

Mr Cahir O'Neill  
Commission for Regulation of Utilities  
The Exchange, Belgard Square North,  
Tallaght,  
Dublin 24.  
(by email to [electricityconnectionpolicy@cru.ie](mailto:electricityconnectionpolicy@cru.ie))

**Re: Shannon LNG Response to the ECP-2 Proposed Decision Consultation – CRU/19/143**

Dear Cahir,

Thank you for the opportunity to respond to the ECP-2 Proposed Decision Consultation (CRU/19/143). Our primary concern is focused on priority connection for High Efficiency CHP<sup>1</sup> (HE CHP).

The ECP-2 consultation proposes priority connection for Autoproducers but is silent on priority connection for HE CHP. That is at variance with the key CRU Decision (CER/03/237) which states:

**“Autoproducers and CHP Producers will be treated on the same basis for the purpose of network connection** and use of system charges.” [emphasis added]

Priority connection for HE CHP is mandated by EU and Irish energy policy and legislation. Article 15, Section 5 (b) of The Energy Efficiency Directive (2012/27/EU) provides that Member States shall:

**“provide priority or guaranteed access to the grid of electricity from high-efficiency cogeneration”** [emphasis added]

Statutory Instrument 426 of 2014 - EUROPEAN UNION (ENERGY EFFICIENCY) REGULATIONS 2014- Section 34 (f) (8) provides that:

“In discharging its functions under sections 34 and 35 of the Act of 1999 in regard to applications for **connection to the transmission system from new producers of electricity from high efficiency combined heat and power generating stations, the transmission system operator shall, taking account of all reasonably practicable considerations and applying non-discriminatory criteria** endeavour to complete the grid connection application process within 24 months of a direction from the Commission.” [emphasis added]

In conclusion, for the reasons set out above, Shannon LNG strongly requests that High Efficiency CHP plants are included in the non-batch process definition for ECP-2.

Sincerely,

Martin Ahern  
Project Manager  
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<sup>1</sup> Disclosure: The Shannon LNG CHP is designated as a Strategic Infrastructure Development and was awarded full planning approval by An Bord Pleanála and is certified as a *High Efficiency* CHP by the CRU.