

Electricity Connection Policy – ECP 2 Consultation  
Commission for Regulation of Utilities  
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## **RE: Public Consultation on the ECP 2 Proposed Decision**

Dear Sir/Madam,

Statkraft Ireland Ltd welcomes the opportunity to engage with CRU and respond to this consultation on the draft ECP 2 Proposed Decision.

Statkraft Ireland Ltd is part of the Statkraft group. Statkraft is a leading company in hydropower internationally and Europe's largest generator of renewable energy. The Group produces hydropower, wind power, solar power, gas-fired power and supplies district heating. Statkraft is a global company in energy market operations. Statkraft has 3600 employees in 15 countries.

Statkraft Ireland develops, owns and operates renewable production facilities and is also involved in the trading and origination of power from our own projects and those of third parties.

Ireland is one the selected growth markets for wind and solar power in Statkraft given its significant renewable energy resources, particularly in terms of wind energy.

Statkraft's global ambition is to increase its portfolio of wind power assets to 6,000 MW and solar power assets to 2,000 MW by 2025. Statkraft Ireland's aim is to play a significant role in Ireland's transition to becoming a low carbon economy and we look forward to working with all interested parties including industry, communities and utility providers.

The Statkraft Ireland team, who are based in Cork and Tullamore, have many years of experience having previously been part of Element Power Ireland which Statkraft acquired in 2018. Our team have previously built a significant project portfolio of 1,300MW in Ireland.

As a Norwegian state-owned utility, Statkraft is a solid, dependable partner, committed to playing a leading role in the Irish energy market.

Statkraft Ireland Limited

Statkraft Ireland supports the Irish Wind Energy Association's (IWEA) and Irish Solar Energy Association (ISEA) responses to this consultation and would like to highlight that the ECP 2 process will be essential to supporting the Renewable Energy Support Scheme and achieving Ireland's future climate ambitions and central to achieving 70% renewable electricity by 2030.

In addition to the comments and positions made in the IWEA and ISEA papers we have the following comments on the draft ECP 2 Proposed Decision

1. Batch Prioritisation - Maintaining the position of prioritising the 25 largest projects on annual renewable energy production is a position that Statkraft supports.
2. Batch Size – Increasing the batch size to 125 per annum is imperative to increasing the available projects for future RESS auctions.
3. Firm Access – It is important that Firm Access Dates are given to Generators in the future for the ECP 2 capacity.
4. Longstop Dates – to enable projects to compete in multiple RESS auctions there should be a change in the longstop dates for the Grid Connection Agreements from the current position of 2 years.
5. Resourcing – there needs to be a commitment from Eirgrid to providing additional resources to the early stage planning of likely connection points. This would allow projects going into the planning system more certainty in their submissions and would streamline the post-planning process for projects.
6. Site Boundary – Statkraft request that the 100m rule for the relocation of generation equipment be extended to 1000m as the evolution of technology will lead to a reduction cost of energy and ultimately a reduction in price for the end user.

We support the positions taken by IWEA and ISEA wish to reiterate that the points raised in their consultation response are extremely important for the efficient and economic delivery of RESS 1 projects.

We would like to thank CRU for the opportunity to engage on this matter and look forward to continuing our work with you in future. If you have any question on our response to this consultation we are available to discuss

Yours sincerely,

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Kevin O'Donovan  
Managing Director of Statkraft Ireland