

Commission for Regulation of Utilities,
The Exchange,
Belgard Square North,
P.O. Box 11934,
Dublin 24
Ireland
9th December 2019
By email electricityconnectionpolicy@cru.ie

Ref: CRU 19/143

Dear Sir/ Madam,

The Tipperary Energy Agency CLG works with a number of community groups and wishes to respond to the consultation REF CRU 19/143.

1. The Tipperary Energy Agency CLG works welcomes the change in the treatment of community energy policy proposed in the consultation referenced above. It is apposite step in the right direction and will improve the abilities of communities to access the grid.
 - a. How will the CRU determine whether the application is a community group (as proposed in the RESS or the EU clean energy package) or a developer pretending to be a community group for the purposes of speeding up the application process. It is the experience of RE auctions in Germany that a well intentioned law, to aid communities was utilised by non community actors to progress developer led renewable energy projects. This is critical, with some requirement for one or more of the following:
 - i. Evidence of previous community development (Energy or non energy related),
 - ii. SEC membership for a reasonable period of time,
 - iii. Indicative membership from an open transparent process of recruitment, a minimum of 151, with PPS numbers that can be verified.
 - iv. Some other affiliation that indicates the organisation is an actual bone-fide community energy development group.
 - b. As the majority of community groups are likely to be geographically located, is the CRU minded to consider any alternative methods of ensuring access for a community group that may potentially have an active developer led renewable energy industry, i.e. if a Kerry community group wishes to connect to the grid, it is likely that they will experience geographic costs as a result of local grid congestion.
 - c. Shouldn't all potential renewable energy developers receive at least indicative costs for connections at specific points in order to decide whether a given location is feasible for connections, notwithstanding the requirement for planning permission to deter speculative planning applications?



2. The current connection process for non-community actors (Sub-500kW Non batch applications) where extensive costs are required for planning permission with the very large risk of excessive connection costs are holding back the potential of Irish roof top renewable energy. It seems that the policy is specifically designed to ensure that the opportunity for large rooftop arrays (unless wholly consumed on site), is being specifically restricted by requiring planning pre-application for grid connection costs. While the argument often given regarding this notes that there is a lack of demand, the demand will come with transparent costs. A fixed modest cost for a feasibility should be included, less than the current ECP1 charge for all generators up to 500kW.
3. The Tipperary Energy Agency CLG fully support the other parts of the consultation document in terms of 2.8, 2.10, 2.11, 2.12.

Please feel free to publish it or contact me with any queries that may arise.

Yours Sincerely,

Paul Kenny B.E. MSc. MIEI C. Eng.
Chief Executive Officer
Tipperary Energy Agency CLG.