



Commission for Regulation of Utilities  
 The Exchange  
 Belgard Square North  
 Tallaght  
 Dublin 24

24<sup>th</sup> January 2020

**RE: Wexford Solar – Response to CRUs ECP-2 Proposed Decision Paper**

Dear Sir/Madam,

Wexford Solar Limited (WS) wish to thank the CRU for the opportunity to submit a response to the CRU’s proposed decision paper on the Enduring Connection Policy Stage 2 (ECP-2) programme.

We have reviewed the proposed decision paper and have identified a number of areas which required some further consideration and/or clarification. Table 1 below set out the sections of the paper that we feel require attention;

Section	Comments
1.2.2	Table 2 outlines the numbers of connection offers issued or awaiting to be issued. What would be of benefit, would be a publication of the attrition rate of the projects whom did not proceed to appetence stage of their offer.
2.4	The target of 50 connection offer per year or per ECP-2 batch. WS feel that this figure is not ambitious enough and should be increased to 75 applications per process. This would allow for the first 25 application with largest number of GWhrs/y been achieved, while not adversely affecting the opportunities of the smaller scale projects.
2.5 & 2.9	The early engagement from the SO is welcomed. WS would like to see how this process may be implemented and further details of the proposed mechanism would be welcomed.
2.8	WS feel that the limitation of the non-batching process of 500kW is too low. For example, the minimum size of wind turbine generator on the market is circa 2MW with the industry standard nearer 3MW. As a result, the one-off developer or community type project will be required to compete with utilities for grid access. It is suggested to raise the non-batch qualifying maximum MEC to 3MW.
2.10	The non-firm offer basis is contingent on the SO completing deep reinforcement works in a timely manner. WS suggest that a form of penalty be applied to the SOs for late delivery of deep reinforcement works.
2.11	WS would like to stress the need for change with regards to the grid connection application costs. It has been confirmed by a number of industry studies, that the ESNB gird connection charges are one of the highest in the world. The level of the fees is seen a disproportionate to the work required to

Wexford Solar Limited: Caulstown Glen Erin Dunboyne County Meath. email: info@wexfordsolar.com ph: +353 1 8255100

	carry out such studies and result in a barrier to one off or community type developers.
2.12.2	WS welcomes the capacity release for pre-ECP-1 offers. This will free up a number of unviable projects, thus allowing a better utilisation of the available system capacity. WS also suggest that the CRU consider that ECP-1 unviable project is afforded the opportunity of capacity release at the appropriate time.

Table 1 – WS comments and clarification requests

If you require any additional clarification or details on the comments set out in Table 1, please revert.

Your sincerely,

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Niall McCoy  
Director  
Wexford Solar Limited

cc: Mr Pat Blount  
cc: Ms Grainne Blount