



Commission for Regulation of Utilities,
The Grain House,
The Exchange,
Belgard Square North,
Dublin 24,

D24 PXW0

24th January 2020

Our ref: DG238 capacity handback request

Your ref: Cahir O'Neill, Stuart Coleman (Emailed to: Electricityconnectionpolicy@cru.ie)

For and on behalf of: Curlew Energy Ltd, connection reference DG238

**Response to the Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision CRU/19/143–
24 January 2020**

We welcome the proposals set out by CRU in ECP 2 draft decision. It is clear that CRU have engaged meaningfully with industry since the ECP-1 direction and that major efforts are being made to improve the connection offer processing system. Ireland cannot meet its 2030 ambitions without such improvements.

Regarding the batch size we believe that the proposal are not ambitious enough and that the system operators must have capacity to process at least twice what has been proposed for annual batches. As a developer of small and medium scale wind energy projects we have a fear that the high volume of consented solar and battery projects will would take up all of the 150 offers proposed for the next 3 years. Wind energy projects can take much longer to consent than smaller output projects that do not require extensive environmental impact assessments. A project which achieves consent in 2020 may be waiting at least 4 years for a connection offer. An offer which may contain grid connection works which could take a further 4 years to consent.

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Capacity Release

We welcome the CRU's proposal to allow a final capacity release as per the 2016 direction. As we have continually set out, the full benefit of the original policy was undermined by the subsequent direction in ECP-1 not to allow capacity relocation. There is a volume of capacity across all technologies which did not avail of the original capacity release as potential development at nearby locations was still a possibility and ECP policy was not yet developed. This was an unfair position for these projects to have been placed in.

Capacity release is an important part of a fully functioning grid access policy. Any capacity which is not progressing must be considered by the SOs during offer processing. New projects may trigger extensive network upgrades due to the presence of this stranded capacity. Currently the only path forward for such projects is to wait until longstop dates are reached and potentially contracts are terminated before capacity is available again. This means that offers may be processed more than once in ECP incurring significant expenses and wasting precious processing resources.

There must be a long term mechanism to allow projects to withdraw and return capacity to the system if the project is unsuccessful in reaching construction and commissioning. Regulators and system operators must not develop policy which further punishes those who have not reached their desired outcome of project realisation after significant investment. With no incentive to withdraw, MWs will remain contracted and increase costs for future projects.

Eddie Sheehan

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