

Responses to proposed decision for ECP-2 from Clean Tech Renewables

2.3 ECP-2 timeline

Response: It's a great idea to have one application window per year over 3 years from 2020 to 2022 and we do agree that the batch should be confirmed within 3 months of the application window closing. We would like to know if there is any minimum period between the ECP-2.1 published and ECP-2.1 submission started dates. This minimum period will give every developer the notice dates to make sure to have one month time to prepare the application.

2.4 Target 50 connection offers per annual batch

Response: We agree with CRU on the amount of 50 offers for each batch and it's fair that the batch size on a number of offers rather than setting a MW threshold. We also advise the CRU to increase the number of offers where possible as future capacity allows.

2.5 Early engagement with projects in the batch

Response: It's good to have an early indication of connection method to developers and we suggest to have indicated quotation with it as well due to all the developers concerning the cost to make the decision. Allowing this early engagement will enable developers to provide feedback to their investors during the process and also aid in attracting investment during the development process.

2.6 Require planning permission to enter the ECP-2 batches

Response: We agree that entry to the ECP-2 batches should require planning permission.

2.7 Prioritising of ECP-2 batches

Response: We have no issue on that the first 25 offers will be given to renewable energy generation projects, but we would like to have clarification on "*The remaining offers will be offered to all generation or storage types*". Do the renewable energy generation projects which are categorized in the first 25 offers still have the chance to compete with others for the remaining offers if there are failed for the first 25 offers? We suggest it's better to give definition or clarification for "*all generation or storage types*" in that instance.

2.7.1 Prioritising by size of renewable energy generation project

Response: Regarding to prioritising the first 25 offers for renewable energy generation projects ranked by largest electricity generation capability first, measured in GWhrs/yr, it's based on DC power or AC power, and what's the criteria of this measurement? Even if there same size of solar PV farm, for example 20MWp, they may have different AC power annual production in the grid connection point due to using the different inverter or transformer, the different engineering design, etc. Could this data of GWhrs/yr come from any approved software like PVsyst, PV Designer, PV tool, SketchUp, etc.

2.7.2 Prioritising by planning permission grant date

Response: We think it's fair to priority by planning permission grant date instead of expiry date.

2.8 Non-batch qualifying projects and processing

Response: We agree to set up the 30 offer per year target for non-batch and we suggest it's better not to limit on this number if there still has capacity to do so. We believe the renewable energy generation projects in industry & commercial scale will be growing very quickly.

2.9 Community-led renewable energy projects

Response: We also support to give the priority to community-led renewable energy projects and it will make more commercial sense if increase the maximum capacity of 500KW.

2.10 Offer capacity on a non-firm basis

Response: We agree with this and waiting for the nature and range of studies which are necessary to assess deep reinforcement.

2.11 Other requirements on ECP-2 applicants

Response: We do agree that applicants who have previously paid an application fee deposit to the system operators and did not progress to offer stage under ECP-1 or other offer process will not have to pay an additional application fee deposit for ECP-2. Just want to confirm if the applicant can submit the new application form with modified MIC/MEC capacity. Can the applicant change it to another asset/project as well?

Responses to Final Capacity Release from Clean Tech Renewables

2.12 Final capacity release

Response: We agree to consider the merits of a final opportunity for capacity release for projects that could not progress in advance of the next ECP batch in 2020 and have no issue on that the system operators open a one-month window for capacity release applications after the last issuance of the initial ECP-1 offers. But we suggest that it also need to be clear what the treatment is if someone misses this final window.