



Renewable Electricity Support Scheme

Consultation Response

24th January 2020, by email to electricityconnectionpolicy@cru.ie

The following response is made on behalf of Community Power. Community Power is a partnership of Irish community, social enterprise and civil society organisations, with a vision for Ireland to run on clean, renewable power, developed for people, owned by people.

The partnership was established to support community energy groups and citizens to develop and own their own renewable energy generation such as wind turbines, solar panels, hydro turbines or bioenergy plants and to facilitate the re-distribution of generated power back to neighbours, businesses and services and facilities in the wider community through the Community Power supplier. Our agreed mission is to support people and communities across Ireland to build renewable power projects, and allow the benefits to be shared across Irish communities.

Partners include:

- Templederry Renewable Energy Limited
- Tait House Social Enterprise
- Community Renewable Energy Supply Limited
- Tipperary Energy Agency
- Energy Communities Tipperary Co-operative
- Friends of the Earth
- Aran Islands Energy Co-operative
- Smart MPower
- Claremorris and Western District Energy Co-operative



The most contentious recommendation that we make here is to standardise grid connection costs for community led projects. We understand this is likely to be met with some resistance, however we would like to point out that the distribution network operator, ESB Networks operates in every town and parish across the country and has a social responsibility to allow communities to take on the energy transition fairly. Currently ESB Networks effectively controls which communities can participate in renewable energy projects, and which can't because the cost of connection varies so extremely across different locations. We would also point out that these costs are currently unknown, so communities are working in the dark, unaware of whether or not connection to the grid will be viable in their area or not. It's not fair. It places undue risk on a community renewable energy project, and needs to change if the energy transition is to happen in a fast and fair way that really welcomes communities to participate, as is required by the EU Clean Energy Package.

Increase the limits on microgeneration

The size of microgeneration in Ireland is extremely small (6 kW or 11 kW). We recommend that limit is increased to 50 kW, and the simple short application form for connecting microgenerators continues.

Coupled with the planned revision of the planning exemptions for solar pv installations currently in preparation by the Department of Planning Housing and Local Government (to extend the current limits beyond 12m² or 50m² as committed in the Climate Action Plan 2019), this would greatly increase the attractiveness of small scale generation in Ireland.

We also recommend a review of the cost of export meters is undertaken. ESN currently charge €340 for an export meter at a domestic property and €640 for an export meter at a community/commercial building. This cost is extremely high and serves as a barrier to communities/businesses/domestic customers who want to sell their excess renewable electricity. For microgenerators wishing to sell any excess power that is generated, the cost of the meter is prohibitive as it would take a number of years to pay off the cost of the meter with any income from selling electricity. In effect this limits microgenerators to self consumers, and results in any excess microgeneration being wasted and given to the grid for free. This serves to benefit the network operator as microgeneration fed into the grid is recorded simply as less loss on the distribution network, and is not fair.

Non Batch connection offers, for projects between 11kw – 1 MW

One of the main challenges for small scale generators when planning a renewable energy investment is understanding and planning for the cost of connecting the generator to the grid. The current process requires a fee of almost €800 plus the cost of planning permission BEFORE the cost for connecting to the grid is disclosed. Ultimately the cost of the grid connection will determine whether or not a project is economically viable, and should be known

upfront. To make the process easier and more attractive for small generators, we make the following recommendations:

- As above, we recommend any projects under 50 kW are connected via the current microgeneration process.
- The decision to exempt community-led projects from requiring planning permission to apply for connection to the grid through the non-batch process is welcome. The definition of 'community led' needs to be considered carefully. The definition within the RESS terms and conditions will likely be too onerous to apply in this situation. We propose that small scale generation from schools, community center's, sports clubs, local authorities, charities, social enterprises and members of the SEAI Sustainable Energy Communities network are defined as 'community led' and thus exempted from planning permission and prioritised.
- Grid connection costs should be consistent across the country on a per kW cost.
- If consistent connection costs are not accepted, then
 - o Require that the costs of grid connection are made public. This could involve an online register of the costs of connections, and their locations over the last 5 years and would allow communities and small generators to make an informed estimate of the cost of grid connection at project inception stage. And going forward, disclosing the costs of grid connections as they occur.
- Public display (online) of the number of non batch applications processed in real time, and the number available for the remainder of the year so that communities and small generators can be aware how many connections will be offered each year.
- Allow for a review mechanism of the limit on 30 applications per year in case the demand grows significantly.

Batch Applications, over 1 MW.

As above, the most significant and unpredictable cost for a community seeking to build a renewable energy projects, is the cost of grid connection. Communities suffer disproportionately from 'postcode lottery'. They cannot choose where they are located, and have no control over whether the grid infrastructure in their area is suitable. The forthcoming RESS auctions propose a separate auction for community-led projects which is very welcome, but is seeking to support communities to develop renewable energy projects in their area. This is simply not practical for communities unless there is a greater understanding of the practicalities, and the costs of connecting projects to the grid.

Community Power are currently working with a number of renewable energy community co-operatives seeking to build renewable energy projects. The difference between the cheapest and the most expensive grid connection is €690,000. On a 4-5 MW project, this cost difference in grid connection costs will make a huge difference to the ultimate price than can be bid in the auction, and will in effect mean that ESNB are ultimately controlling which communities will be successful in the auction.



We recommend:

- Consistent grid connection costs for community led projects. We suggest €60,000 per MW, which is significantly higher than grid connection costs across Europe.
- Ring fenced grid capacity for community led projects at nodes around the country as upgrades are already happening.
- If consistent grid connection costs are not offered, then we recommend
 - o A map of grid connection capacity around the country is prepared and managed online, so communities can see where opportunities exist.
 - o A public display of grid connection costs at nodes around the country is made available, so communities can assess the costs of grid connection at project inception stage.
- The proposal to remove the requirement for planning permission for community led projects is very welcome.