

Commission for Regulation of Utilities
The Exchange,
Belgrade Square North,
Tallaght,
Dublin 24,
Ireland

electricityconnectionpolicy@cru.ie

24 January 2020

Public Consultation on the Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision

EDF Renewables is part of one of the world's largest electricity companies and our investment and innovation is bringing down costs for consumers and bringing significant benefits for communities. We operate in more than 20 countries around the world. We develop, construct and operate wind farms (onshore and offshore), solar and battery storage projects, and have more than 25 years' experience in delivering renewable energy generation. We have recently opened an office in Ireland and are already in advanced discussions for an onshore wind development pipeline of around 500MW, with aspirations for far greater growth in Ireland across all technologies.

We welcome the Commission for Regulation of Utilities (CRU) consultation on the Enduring Connection Policy Stage 2 (ECP-2) Proposed Decision. Delivery of Ireland's ambition of 70% renewable electricity by 2030 will require substantial capital investment across the economy, with much of this investment coming from the private sector. We recognise the importance of effective connection policy to contribute to the successful facilitation of this.

The sustainable development of Ireland's renewable energy resources is critical for the delivery of this objective; connection policy will have a direct impact on Ireland's ability to achieve this. A key role for the CRU is to deliver an effective connection policy that enables the efficient delivery of renewable electricity developments.

We have set out in our response some of the key aspects of the ECP-2 Proposed Decision that could affect developers, which we recommend are reviewed. In addition, we fully support the Irish Wind Energy Association's (IWEA) response to this consultation, which highlights important points for the efficient delivery of connections to the grid system.

ECP-2 Timeline

We welcome the frequency and the paralleling of the annual batches. We would ask the CRU to consider a processing timeframe of 12 months per phase from batch start to batch completion to facilitate an efficient annual delivery for the three ECP-2 phases.

Target 50 connection offers per annual batch

We believe the ECP-2 Proposed Decision batch size is low at 50 offers; the number of offers per batch should be increased to a total of 125. This would help alleviate the number of projects with planning consent currently queued and waiting on a connection offer to progress development. Given ECP-1 processed 125 batch offers and, as stated in the proposed decision, the CRU also assessed that the system operators had the capability to process a further 30 non-batch offers in approximately an 18 month period. We believe the system operators should be encouraged to process and issue 125 offers per batch based on their experience of the previous processing of capacity release connection policies. We agree on the proposed decision to opt for number of applications rather than setting a MW threshold.

Early Engagement

We consider the early customer engagement as a welcome and positive approach; these engagements should be early in the batch process and be informative to facilitate their effectiveness. We welcome the proposed decision to allow developers the opportunity to exit the process early and alleviate the potential delays of processing and issuance of unacceptable offers. We would ask that modifications are processed efficiently. Flexibility should be encouraged for minor modifications such as a reduction in MEC. Downward MEC should be allowed prior to the processing of offers if expensive connection works can be avoided.

Requirement of Planning Permission

We are in agreement with the CRU that the requirement for planning permission has been successful and should be retained as a component of the connection application process.

Prioritising of ECP-2 batches

We generally agree with the prioritisation as defined in the consultation; however we would again request the CRU to consider a batch size of 125 offers. The prioritising of these offers should be as the proposed decision, the first 25 offers for renewable energy generation projects ranked by largest electricity generation capability first, measured in GWhrs/yr and 100 offers processed by earliest grant date of planning permission.

Non-batch qualifying projects and processing

We agree in principle with this decision. While 30 offers for non-batch processing are applied, there could be a proliferation of applications for small generation 11kW – 500kW as seen in other jurisdictions for commercial roof top solar and small wind. We would be concerned if not appropriately resourced this could impact the delivery of both non-batch and batch offers.

Community-led renewable energy projects

We agree that community led projects should be assisted in policy and believe the ECP-2 proposed decision supports this. We would ask that further clarification is published on how a project qualifies as a community-led project in the ECP process.

Offer capacity on a non-firm basis

We would agree at the offer stage to issue offers on a non-firm basis but it cannot be open ended. The CRU and the system operators as stated should be working in parallel towards addressing this and work towards issuing the reports and delivering on the Associated Transmission Reinforcements (ATR's). Generators need to be given the information to make informed financial decisions and issued a program that results in the removal of system constraints.

Other requirements on ECP-2 applicants**Application fees**

Application fees would be deemed high. Application fees should be averaged to the function of the service provided.

Security for shared assets' costs and interdependent offers

Security on shared connections should not be prohibitive and add unnecessary burden. As a pre-condition to applying for and securing a grid connection offer a project will have already evidenced a significant financial commitment in achieving planning consent. This significant commitment should be taken into account when deciding if the conditions still remain for security for shared assets still remain. The CRU should conduct a review post ECP-1 to determine if the timing and conditions of this security restricts a projects progress.

Longstop dates

The decision to reduce the long-stop periods adds additional risk to the pipeline of projects eligible to bid into auctions as it doesn't allow projects to try and improve their price for a subsequent auction. In terms of ensuring a competitive RESS outcome and delivering the renewable capacity needed for 70% RES-E by 2030, it is important that appropriate long-stop dates are set that allow projects the flexibility to enter at a minimum two auctions or find an alternative path to market within a reasonable timeframe, without the threat of connection offer termination. Projects that have got to this stage would have already applied considerable costs into the process and are likely to have obtained consents for projects which should be taken as a statement of their intent to deliver.

Distribution System Security and Planning Standards Review

We would ask the CRU to examine the timelines associated with the processing of modifications triggered by the new changes if adopted. The CRU should consider applying an accelerated modification process for all modifications triggered by changes in the planning standards; this should also include minor modifications.

Final capacity release

We agree with the decision to have a capacity release mechanism post ECP-1. We would encourage the CRU to extend this to include a capacity release in all ECP batch phases to allow projects to release capacity back to the system. This capacity can be recycled into future ECP processes so other projects can make effective use of it.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Kevin Daly on 087 125 1224, or me. I confirm that this letter may be published on the Commission for Regulation of Utilities' website.

Yours sincerely



Mark Vyvyan-Robinson

Director of Development and Investments
EDF Renewables