



**NETWORKS**

**ESB Networks Submission:**

**Enduring Connection Policy Stage 2 (ECP2)**

**Proposed Decision**

24<sup>th</sup> January 2020

## 1. Introduction

ESB Networks (ESBN) welcomes the Commission for Regulation of Utilities (CRU) Proposed Decision on Enduring Connection Policy Stage 2 (ECP2).

ECP1 was a positive step forward regarding the grid connection policy for processing generator applications with measures such as the requirement for planning permission resulting in a transition to more shovel ready projects being studied and issued connection offers for network capacity.

ESBN is supportive of the proposals made by CRU and acknowledges the constructive engagement with CRU, industry and stakeholders and is committed to building on the principles of ECP1. ESBN look forward to working with CRU in their finalisation of ECP2 policy including the provision of any required support as CRU consider the consultation feedback received following the Proposed Decision on ECP2.

ESBN welcomes more frequent batches to operate in parallel with RESS Auctions and opportunities to issue connection offers to project developers and facilitate grid connections to enable Ireland in meeting the 2030 RES-E targets as set out in the DCCAE Climate Action Plan (CAP).

ESBN also welcomes the opportunity of working with community led energy projects as local energy development is a key contributor to Ireland's low carbon future.

In addition to supporting ECP2 policy ESBN have included as part of this submission a number of observations under the headings below:

- ECP2 Targets
- Batch Overlaps
- Customer Engagement
- Planning Standards Review
- Final Capacity Release

## 2. Submission

ESBN has considered the ECP2 Proposed Decision Paper in detail and is encouraged and strongly supportive of the proposals therein. We would like to make the following observations:

### ECP2 Targets

ESBN believes that the implementation of a GWh target for each of the ECP2 Batches would better meet the CRUs objective of delivering low carbon solutions and supporting the 2030 RES-E targets as set out in the DCCAE Climate Action Plan.

ESBN look forward to working with CRU in their finalisation of ECP2 targets including provision of any input required as they consider the consultation feedback they receive.

### ECP-2 Timeline

ESBN is supportive of more frequent batches which will support the pipeline of projects for the RESS Auctions. It is important that when deciding batch sizes, that there is a balance between sufficient number of projects receiving connection offers and the efficient processing of studies and offers within the timelines set out in the proposed decision. While ESBN is committed to processing all ECP applications in an efficient manner, it is important in making its' decision on ECP2 policy that CRU are cognisant of the potential impact where there are crossovers between batches, particularly with projects at the same node where modifications are required if for example a project decides to withdraw following a RESS auction.

### Customer Engagement

ESBN has significantly increased the level of customer engagement as part of the ECP1 process which has been welcomed by developers and ESBN welcomes the opportunity for early engagement with project developers through customer connection method meetings. There have been learnings from ECP1 which we will take into ECP2 where initial high level assessments can identify where significant works to the network are required to facilitate the project developer's connection. ESBN recognises that a move to locational prioritisation is discussed in the CRUs separate Call for Evidence and as previously advised to the industry, ESBN is planning to publish heat maps identifying available transformer capacity which will enable project developers make more informed decisions.

ESBN acknowledges the importance of community-led energy projects in the context of driving towards a low carbon future and supports the expedient processing of connection offers for community-led projects by designating a portion of the non-batch connection offers per year available for such projects. ESBN understands the definition of community-led projects is in the process of being finalised by DCCAE/CRU, and would like to highlight that this definition should be clear in advance of the window for acceptance of applications under ECP2.

### Planning Standards Review

The Distribution System Security and Planning Standards are currently under review and it is expected that this review will be complete when the ECP2 batch application window opens, subject to the CRU review and approval. This review has been carried out with a view to connecting more renewables on to the system, through the initial introduction of non-secure connections. It is important that it be noted that new standards will apply only to applications that are received as part of ECP2.

### Final capacity release

ESBN supports the opportunity for projects to terminate their connection agreements and release their full MEC on the same terms and conditions for capacity release outlined in CER/16/284. We believe there is value in opening up this capacity release to all projects pre-ECP1 including fold ins. The opportunity could be available to any project which does not have planning permission, so that the released capacity is made available for future projects under the ECP2 application process. We welcome the opening of a one month window for capacity release applications after the re-optimising of any ECP1 offers. It is important that any capacity release process is completed in advance of deciding the ECP2 batch so that the available grid capacity is known and early customer engagement can be carried out in advance of deciding the ECP2 batch.

### Next Steps

ESBN welcomes the opportunity to support CRU in the finalisation of ECP2 Policy and is committed to the implementation of ECP2 through the processing and connecting of those projects.