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24<sup>th</sup> January 2020

Commission for Regulation of Utilities,  
The Grain House,  
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Belgard Square North,  
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**Emailed to:** Cahir O’Neill, Stuart Coleman – [Electricityconnectionpolicy@cru.ie](mailto:Electricityconnectionpolicy@cru.ie)

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

Harmony Solar welcomes the opportunity to engage with the CRU and respond to the proposed decision on ECP-2. 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. The Climate Action Plan directs CRU and system operators provide a ‘fit for purpose’ connection process. The draft decision does not get us there, but it is another step in the right direction.

Harmony fully supports the Irish Solar Energy Association’s (ISEA) response to the proposed decision and would like to highlight the importance of the ECP process in delivering the renewable connections necessary to achieve Ireland’s 70% renewable electricity target by 2030. This document adds some additional points which we believe are important for the success of future batches.

## Batch Size

Regarding the batch size we believe that the proposal is wholly unambitious and shows no desire to ensure that all customers are provided with a connection offer they are entitled to. Both system operators have capacity to process at least twice the 50 offers proposed for annual batches. The ECP-1 process and non GPA processes have proven this. It makes no sense that CRU propose a batch size of 50 offers which is far below existing capability. This volume is clearly not in line with the ambitions of the DCCAIE and the requirements for competition in the RESS auctions.

As a developer of large and medium scale solar energy projects we have a fear that the high volume of consented solar and battery projects (approx. 200 projects we estimate) will take up all of the

150 offers proposed for the next 3 years and block any new projects. A project consented in 2019 or 2020 may not qualify for batch processing for 5-6 years. When an offer is finally received there may be grid consents required and long lead time connection works to be carried out by ESBN or EirGrid in this offer. This means that actual participation in an auction may be 7-8 years from now for these projects.

We note also that many ECP-1 projects may seek to be reprocessed in ECP-2 if they are unable to accept their offers. Reprocessing existing offers will further impact the ability to address the significant connection queue.

A fit for purpose connection processing system will address the long queue of real projects with consent seeking a route to market. CRU must direct ESBN and EirGrid to put adequate resources in place to process as many offers as possible in the ECP-2 batches.

### Efficient Early Engagement

Harmony solar welcome the proposals for efficient early engagement. As our first connection offers are due to issue in ECP-1 we find it surprising that CRU need to direct the SOs to engage efficiently with customers. Isn't this a licence condition? We expect that ESBN will discuss our connection offer in detail and work with us to engineer cost effective connections if non viable connection methods are identified.

If the SOs must be directed to improve engagement then we request that CRU do this immediately for the benefit of ECP-1 projects. Improved engagement should result in more efficient processing and allow more offers to be processed and ultimately accepted.

We are aware that the ESBN planning standards have been consulted upon recently and may change over the course of ECP-1 processing. In particular, the proposal for 'non secured access', will alleviate the requirement for expensive transformer upgrades at many stations. Harmony solar expect that if this transformer policy is adopted that the new standard will be offered to all ECP-1 generators. Efficient engagement must also include flexibility on downwards changes in MEC to reduce connection works.

### Capacity Release

We welcome the CRU's proposal to allow a final capacity release as per the 2016 direction. 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. The capacity release proposals must be expanded to allow for partial capacity also as per the previous policy. Many contracted projects have planning which does not match their MEC. These projects with stranded capacity must be motivated to return capacity to the system to allow for lower cost connections for projects in the next batches.

## Project Extensions

There may be projects seeking extensions to contracted or to ECP-1 projects in ECP-2. These projects should also be prioritised for processing. Project extensions where minimal additional shallow connection works are required have a major advantage in terms of cost and speed of deployment. If we are to meet our 2030 ambitions, projects which can proceed at a greater pace should be prioritised for the same reasons as CRU propose to prioritise by size of renewable energy generation project.

Trusting the above is in order

Kind regards

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**John Swan**  
**Harmony Solar**