



BY EMAIL ONLY
Mr D Ashe
Commission for Regulation of Utilities

7 August 2020

Email: cathal.hennessy@rwe.com

Dear Dylan

Ref: Network Charges for Commercial Storage Units Interim Solution

Thank you for providing RWE Renewables Ireland the opportunity to respond to the above consultation. RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies. We have up to 1.3GW of projects, including onshore wind, offshore wind and battery storage. Two of our battery storage sites are currently under construction.

Following the transfer of Innogy Renewables into RWE Renewables, RWE is now one of the world's leading producers of renewable energy: RWE now stands as the world's second largest offshore wind developer and third largest provider of renewable electricity across Europe.

We welcome the proposed interim solution for network charges, which seeks to address the current issue of "double charging" for commercial storage and the expectation that the interim solution will be implemented in time for the start of the next tariff year (1st October 2020). We agree that the interim proposal to not charge G-TUoS for commercial storage, and instead charge only D-TUoS is the most pragmatic option to address the live issue and we support the interim proposal as set out in CRU/20/066.

We also welcome the confirmation that there will be a wider tariff review in 2021 which will provide the opportunity to consider the most appropriate network charging options for commercial storage units. Any future tariff must recognise and reflect the impacts upon and benefits to the network (and wider energy system) that commercial storage units deliver.

We note that in Germany, any storage facility providing system services (which commissions between August 2011 – August 2026) is exempted from paying the Use of System charges for 20 years. We also expect significant changes in the UK market re the Use of System charges for storage, which would follow the positive decision by Ofgem removing liability for BSUOS charges from imported electricity for storage units.

If you have any questions regarding our response, please do not hesitate to contact me or our Senior Regulatory Affairs Manager, her email address is kate.garth@rwe.com.

Yours sincerely,

Cathal Hennessy
RWE Renewables Ireland

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