

Sycamore House,  
Millennium Park,  
Osberstown, Naas,  
Co. Kildare. W91 D627

Friday, 15<sup>th</sup> December 2017

Gosia Sadowska  
Commission for Regulation of Utilities  
The Grain House  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24, D24 PXW0

Submitted by email to: [electricityconnectionpolicy@cru.ie](mailto:electricityconnectionpolicy@cru.ie)

### Re: IWEA Response to Electricity Connection Policy

To whom it may concern,

The Irish Wind Energy Association welcomes the opportunity to make a submission in respect of the CRU's 'Electricity Connection Policy' (ECP) consultation. IWEA is the leading renewable energy representative body in Ireland and as such has an active interest in the potential and development of renewable energy in Ireland, particularly wind energy. Approximately 120 organisations are members of IWEA across all areas of the wind industry including community engagement, planning, grid development, market design, health & safety, and asset management. IWEA works in a proactive and engaging manner with all stakeholders and as such feels it is both appropriate and important to make this submission, which is attached to this cover letter.

IWEA's wind development forecast indicates that Ireland is likely to fall short of the 2020 RES-E target of 40%, while at the same time IWEA's members have more than sufficient projects in place to meet and even exceed this target. Access to the electricity grid is a major barrier for many of these projects so it is essential that the ECP is implemented as soon as possible to enable wind farms with planning to access the grid as soon as possible. The response attached outlines some important considerations and provides a range of recommendations for the implementation of ECP.

Please don't hesitate to contact me if you need any further information.

Yours Sincerely,



David Connolly  
Head of Policy



**IWEA Submission:**  
**Response to Enduring Connection Policy Stage 1 (ECP-1)**  
**Proposed Decision and Ruleset**

Submitted: December 15<sup>th</sup>, 2017

1	Introduction .....	3
2	Key Issues .....	3
2.1	Renewable generation must have priority in ECP-1 .....	3
2.2	ECP-1 cannot be successful without an increase proposed batch size .....	5
2.3	Relocation .....	8
2.4	Group Charging .....	9
2.5	Eligibility Criteria – Evidence of valid planning .....	9
2.6	Eligibility Criteria – Planning Expiry.....	11
2.7	Changes to ESB Network processing fees.....	11
2.8	Longstop Dates.....	12
2.9	Firm Access .....	12
2.10	DS3 Prioritisation Ruleset .....	13
2.11	Suggested changes to Processing to improve ECP -1 .....	15
3	Conclusion.....	16

## 1 Introduction

IWEA welcomes the CRUs proposed decision on the Enduring Connection Policy Stage 1 (ECP-1). We welcome, in particular the suspension of processing of Non-GPA applications which we have been calling for since the damaging distortion of this policy over the past 2 years.

## 2 Key Issues

The key recommendations of IWEAs response can be summarised as follows and will be discussed in detail in this submission:

1. Renewable generation must have priority in ECP-1.
2. Increasing the batch size for ECP-1 is crucial.
3. Retrospective change to the COPP relocation rule should not be allowed
4. Change to charging policy for shared assets is not required.
5. Prioritise projects based on date order of planning grant.
6. Change in ESBN processing fees is not necessary and unjustified.

Visibility of the post 2018 future ECP offer processing timelines and volumes needs to be released to prevent creating a new cliff-edge for connection applications

Points 1 and 2 above, essentially align with IWEAs submission to CER in February of this year on reform of Grid Access. In this paper IWEA called for 2 simple changes to the Non-GPA policy which could have been implemented without consultation:

### **1. Change Non-GPA to a planning based system instead of date order.**

### **2. Open Non-GPA for all renewable technologies**

The ECP-1 proposed decision has included for a change to a change to a planning based system, which is critical in to rationalising the grid queue. This step alone would resolve much of the targeted grid access policy issues. However, the proposed decision has sprawled in many unfocused directions and there are some potentially damaging restrictions proposed.

We believe that by considering our recommendations these can be addressed and resolved and that ECP-1 can be extremely successful.

### 2.1 Renewable generation must have priority in ECP-1

Ireland must provide 40% of its electricity from renewable sources by 2020 to comply with EU targets, with wind likely to contribute 35-37%. IWEA's latest estimate suggest that this will require

approximately 4300 MW of wind power and currently there is approximately 3150 MW of wind generation installed. An additional 1150 MW of wind needs to be delivered between now and 2020. Based on a recent review of IWEA members, which took place from September to November 2017, there is currently less than 350 MW of wind energy which is fully consented i.e. consents in place for both turbines and grid connection works, so it is highly probable that existing wind projects that should have contributed to Ireland's 2020 targets will no longer do so. Effectively, access to the electricity grid and planning consent for connection works for consented projects is now the single biggest barrier for Ireland to achieve its 2020 RES-E targets. It is essential that any access provided under ECP-1 is prioritised for renewable energy projects to mitigate the impending 2020 shortfall. The impact of this is compounded by the ongoing impacts of Ireland's shortfall in 2020. The current draft of the EU's Clean Energy Package is assuming that 2020 targets are met and is proposing that 2030 targets are defined "with a linear trajectory for that contribution from 2021 onwards". Therefore, Ireland's 2020 targets for each Member State should be viewed as a minimum for each year after 2020 to 2030, so any shortfall in 2020 could result in non-compliance fines each year thereafter. Even if ECP-1 cannot fast-track renewable projects by 2020, it should still facilitate these projects as soon as possible to minimise the impact in the subsequent years.

Furthermore, under Article 16 of the existing EU's current Renewable Energy Directive (2009), Ireland and as a consequence the CRU" shall also provide for either priority access or guaranteed access to the grid-system of electricity produced from renewable energy sources". Considering the likely shortfall in meeting our EU targets and the EU requirement that renewables should be provided with either priority/guaranteed access to the electricity, it would seem prudent that the limited capacity available in ECP-1 is it prioritised for renewable generation.

It's worth noting that grid access has been available for both CCGT and OCGT projects (in Gate 3 and pre-Gate 3), which despite having planning consent in some cases have not been realised. The barriers to entry for such plants has not been access to a grid connection offer so there is no need for ECP-1 cater for such plant. IWEA of course recognise that new flexible generation and new dispatchable conventional generation will in time be required on the Irish system. We believe that grid access particularly for very large scale generating plant does not belong in "group processing" policy. In this respect IWEA would strongly suggest that consideration be given to applying an MEC cap of 100MW for grid connection offers to be processed under ECP-1 and any future 'group' processing rounds. There are a likely to be only a relatively small number of projects above this size and given their potential impact on the system, IWEA believes a separate process is required, to ensure that the system is developed efficiently for projects on this scale. A cap of 100MW is consistent with the proposals for DS3 access.



## 2.2 ECP-1 cannot be successful without an increase proposed batch size

The proposed decision allows for only 600MW of generation application to be processed and potentially as few as 30 individual connections offers. IWEA welcomes CRUs proposal that the thresholds should be reviewed once the nature, size and location of projects applying for ECP-1 are known. The proposal in its current form is limited in scope and could have damaging consequences if significant volumes of wind generation are excluded from ECP-1. We set out here the reasons why IWEA believes the ECP-1 must aim to processes as much consented renewable generation as possible.

### Interaction with RESS Auctions

In their recent consultation DCCAE envisage implementation of qualification criteria in determining which projects are eligible to compete in future RESS auctions. This is likely to include planning permission and a grid connection offer/agreement for the project. Therefore, any limitation to consented renewable energy projects in accessing grid connection agreements, has the potential to unnecessarily limit competition in these auctions. Limits to competition will have a direct impact on consumer costs. IWEA would particularly draw the CRU's attention to the Economic analysis prepared by Cambridge Economic Policy Associates Limited(CEPA). While there will likely be a mix of renewable technologies required in our future system, there is no doubt that onshore wind is likely to make up the largest part of any cost optimal renewable mix.

A small batch based on planning expiry will include the oldest consented projects and could exclude those projects which have received a planning consent more recently (We will address the 'date of planning expiry' criteria separately). The latest consented projects represent state of the art technology delivering the best energy yields. Any policy which excludes these projects will in turn lead to higher RESS prices and a negative impact on electricity consumers. CRU must ensure that ECP-1 policy does not pre-determine the outcome of the first auctions.

### Number of offers Threshold Review

In the proposed direction CRU outline that there are "practical and sensible limitations" to scale of offers processed under ECP-1. It is also set out that "past experience" is guiding the proposed thresholds as presented. IWEA propose that it is practical, sensible and achievable that all consented wind generation can be processed under ECP-1.

Experience of the gate processes, and in particular gate 3, may indeed lead the SOs to the conclusion that the scope of ECP-1 should be limited. However, the most recent experience of the Non-GPA system is more relevant when considering the batch size for ECP-1. Apart from the fact that the Non-GPA system was processing almost exclusively applications for solar PV for the last two and half years, the experience with the policy has shown that large volumes of offers can be processed in parallel. In the 2016 and 2017 regular updates from the SOs, approx. 100 offers were live or processing at any given time. These offers are at different individual transmission nodes, but this did not limit the complexity of many of the individual connections. In ECP-1 the volume of applications will be significantly lower even with the backlog of consented projects which have not be processed. During this surge in activity system operator resources were not scaled up accordingly so much more could be achieved if an ambitious ECP-1 batch is sufficiently resourced by each system operator.

ECP-1 will not be like previous gates in terms of complexity. IWEA is aware of the volume of wind farms which may potentially seek a connection through ECP-1. What is immediately clear is that, none of these projects are located close to each other and none are likely to interact at 110kV node level or trigger significant grouping as per gates 2 and 3. This immediately reduces the complexity of any potential grouping required in offering connection methods. The key reason for this is that newer wind developments have been guided by the locational signals through the grid development associated with the delivery of gate 2 and gate 3. The most likely places where grouping may be triggered in ECP-1 are where clusters of consented solar generation are located.

For this reason, we see no reason why ECP-1 should be limited to 50 offers in total. IWEA propose that at least 100 new offers can be processed under ECP-1 if required.

On a related note, the SOs have no justification for keeping the whole application fee for a project that has failed to get into the processing round because it is oversubscribed. Fees charged by network companies need to reflect the work that they do.

### **MW Threshold Review**

The 1000MW ECP-1 batch is proposed as it represents some of the renewable energy generation capacity previously offered and not delivered. IWEA agrees that this is a reasonable place to start to determine the batch size if a limitation is required. The 400MW of DS3 capacity however, which is required to provide FFR and POR services should not be included in this threshold.

The DS3 projects will not compete with renewable generators for firm access and should be considered separately. These projects are flexible in terms of location also and do not need to interact

with location constrained renewable technologies for shallow network capacity either. It should also be noted that approx. 400MW of flexible generation capacity was recently returned as part of the capacity release policy also. For this reason, the full 1000MW of wind generation recognised as lapsed or released must, at least, be offered to renewable generators under ECP-1.

As called for in IWEAs earlier submissions, it is crucially important that generation projects have confidence that a grid offer will be made available in a reasonable timeframe. By potentially limiting the scope of ECP-1, IWEA fears that projects which could fall outside of the batch have no confidence of receiving an offer in a timely manner. We understand that there is a will for more frequent processing of batches under the ECP policy than seen in the past but as stated in the direction the policy for any further batches is uncertain. This means that there will be a significant risk to projects which are not included in ECP-1 re the timing of the next batch and the criteria for inclusion in the next batch. Any time lost waiting for a connection offer is taken from the limited lifetime of hard earned planning consents. Further time will be required to design and consent a connection method when offered and possibly to participate successfully in an auction.

In ensuring that ECP-1 delivers a connection offer for as many consented projects as possible the volume of offers in future batches can be reduced. The rate at which generators can achieve planning is highly constrained by the planning process. This is especially true for wind farms and other large-scale generation projects. This will naturally dictate the rate at which projects apply for grid and the volume of applications that the grid companies will have to process.

We call for clearer visibility of the future procurement system to be released as soon as possible. If a batching system is retained beyond the 2018 round – it is important that a medium term schedule of grid connection application windows is published along with the final ECP-1 decision – confirming volumes and rough cut off dates (monthly/ quarterly indication). This schedule should be updated on a rolling basis. This would be a key tool for providing project investors with visibility of connection timelines and limiting the appetite for speculative applications (that surge when only a limited application window is provided).

As per IWEA's February response the ideal enduring solution beyond the 2018 round would entail processing application on a conveyor-belt basis (as per the non-GPA policy). IWEA believe this is achievable if the current back log can be cleared.

IWEA Proposal



IWEA propose that a batch size of 1000MW of “wind equivalent” be offered under ECP-1 as well as 400MW of access for DS3 projects. This batch size corresponds to the capacity of wind which was lapsed or released from Gate 3. ECP must recognise that we are striving to deliver renewable energy not MWs. For any solar generation included in ECP-1 the energy output will be approximately one third of the wind equivalent.

### To Summarise

- Let the market decide which projects are realised and not ECP-1
- The SOs are capable of processing a larger batch quickly
- Don’t create a backlog and further uncertainty for projects in subsequent batches
- 1000MW wind equivalent capacity should be offered at least
- Visibility of the post 2018 future processing needs to be released as soon as possible to prevent creating a new cliff-edge for connection applications

### 2.3 Relocation

IWEA accepts and fully supports the principle that grid capacity relocation and grid trading will no longer be allowed or needed under a planning based grid access system. However, the COPP relocation ruleset must be preserved for “contracted” projects. IWEA is aware of some developers who still intend to use the COPP relocation rules on projects which aspire to meet the Refit II deadlines and contribute to 2020 targets.

The retrospective nature of the proposed decision is potentially very damaging to developers who intend to relocate capacity but have not yet done so. In some cases, the ability to process a modification request for relocation was blocked by the fact that a Non-GPA offer was processing at the same node. Other developers may have decided to release capacity if the intention to retrospectively change the COPP rules on relocation had flagged before the capacity release deadline this year. For these reasons we believe proposed decision is unfair.

#### IWEA Proposal

Relocation for contracted projects subject to existing COPP rules should be allowed, with the addition that relocation can only be to a site with planning consent and that one relocation modification only

can be allowed. IWEA also suggest that a second round of capacity release be offered when the ECP-1 decision is made. The final publication of the ECP rules may offer an exit signal for further capacity release.

## 2.4 Group Charging

IWEA strongly disagree with the proposed changes to group processing charging. This proposal should be dropped. The system operators have presented no evidence to support the proposed changes or how the UOS customer faces any additional exposure to stranded assets costs under ECP-1. The present policy has not resulted in significant stranded assets or any known groups where the UOS customer has had to fund stranded assets. There are no known groups where a connection offer for a wind farm has been terminated. The risk of grid offers terminating in a system where planning permission is a requirement is of course much lower.

The existing policy CER/15/098A “Implementation of Group Processing – Move to Construction phase” already means that groups must move at the pace of the most advanced project. In any group where projects cannot proceed and decide to terminate connection offers the system operators will have the ability to redesign the connection method to limit any exposure to the UOS customer. This policy has been extremely effective in allowing projects to accept offers and groups to proceed to construction. The certainty around project delivery will be only further enhanced given the need to secure planning consent as a pre-requisite for grid application.

The increased burden of placing a bond for all shared works will be impossible for many projects to carry. Particularly projects developed by smaller independent developers. For projects which will rely of success at RESS auction the timing of bonding requiring will not be aligned to the auction process. The proposal presented will eradicate any benefit to group processing. The risk premia that investors calculate for grouped projects will increase which will either mean that the projects are disadvantaged in RESS auctions or where they are successful it will increase the costs of renewables for the consumer.

This policy should be removed from the proposals as it unduly increases complexity and bureaucracy and is counterproductive in terms of potentially increasing costs to the consumer.

## 2.5 Eligibility Criteria – Evidence of valid planning

IWEA believes that the proposed rules regarding material changes to generation equipment are overly restrictive. The text in Annex I regarding modifications is so onerous that it is unworkable for

generators. We support what we believe is the intended effect of these measures, which is to ensure that developers are not able to speculatively acquire grid and then trade this capacity in secondary markets without having developed a real project. We would suggest the following measures would achieve this same goal but would have a number of advantage over the proposed approach. The project must demonstrate at the time of grid application, that there are commercially available turbines that do not exceed the planning permitted physical turbine dimensions and number of turbines, which would provide an installed capacity not less than the MEC being applied for.

- The following minor (and commonly required) modifications to wind farm developments should be permitted:
  - Changes to siting of turbine locations by distances permitted by the planning authority during the planning consent process, including the planning consent process for minor amending permissions to the parent permission to which the grid application relates (not restricted to 100m)
  - Changes in turbine hub height, tip height and rotor diameter.
  - changes in installed capacity (not MEC) within existing over-installation rules.

The advantage of this proposed ruleset is that in some cases the proposed grid connection method for a project may have a long lead time, including its own permitting timelines. Provided the developer has permission for a site that matches the MEC (i.e. it is not a speculative site), then it makes sense for consumers, that developers have the flexibility to make use of the grid development time to carry out some optimisation of their sites. This flexibility would likely result in lower auction bid prices and therefore better value for consumers.

Lowering of MEC when final turbine procurement is complete should be welcomed. Increases in MEC should only be allowed if capacity is made available through another processing round of ECP and if the project meets the eligibility criteria at that time.

IWEA believe that certification by a solicitor is unwarranted and unnecessary as it will be clearly evident and on public record that the project will have planning or not. There is no requirement to introduce additional cost and regulation in this area. A planning reference will be included with an application and verification of validity can be carried out by the system operators.

## 2.6 Eligibility Criteria – Planning Expiry

IWEA believe that the proposal to prioritise access to ECP-1 based on date of planning expiry is flawed. While the principal of trying to determine those with the most urgent need for access is to be welcomed, IWEA suggests that the date of grant of planning permission is the correct prioritisation criteria for ECP-1. The proposal penalises projects which may have sought 10-year planning applications. For example, a wind farm with a 10-year planning granted in 2012, would be processed after a solar application granted a 5-year consent in 2015. Also by moving to a prioritisation based on date of planning grant it is not necessary to determine a planning cut-off date.

IWEA disagree with the proposal to exclude any projects which are subject to a judicial review of planning consent decisions. The recent practice of judicial review of wind farm planning decisions is often brought about from a small number of individuals and are vexatious in nature. The barrier to raise a judicial review is low and this avenue have been abused by a small number of wind farm objectors.

If a project has achieved planning consent it should be eligible for processing under ECP-1. If that project subsequently loses its planning consent after a judicial review the connection offer if issued should be withdrawn. This should be the same procedure where planning expires on a given project before it is constructed.

## 2.7 Changes to ESB Network processing fees

IWEA do not see the need for a review of processing charges under ECP-1. The proposed changes to ESBN processing fees are totally unacceptable. The ECP-1 consultation is not the correct forum to propose such changes. Processing fees and standard charges are approved annually by CRU. If there is any need for a radical change to ESB charges for processing this should be consulted on separately as part of the annual review on ESBs 'Schedule of Generator Application and Modification Charges'.

Of all of the poor practices in connection processing, the lack of resources, lack of engagement, poor record of delivering projects on time that all have a huge impact on customers we are extremely surprised that CRU would choose to describe the ESB processing fees as an "anomaly" which should be addressed in this proposed decision.

It is also not clear why CRU determine that alignment with TSO charges is required under ECP-1 or why the differences in charges between TSO and DSO should be viewed as an "anomaly". The proposed decision does not explain why the perceive issue is not addressed by aligning the TSO fees

with the current DSO fees. Charging should of course reflect the level of actual work that is required to process connection offers only.

Instead of raising fees (by over 2000% for one MEC bracket) with no justification it would be much more beneficial to propose some measures to improve the offer processing system. Recently it has been almost impossible to access the ESBN networks planning and commercial team staff. ESBN have been unable to facilitate requests for meetings and even simple requests for information have taken months to be resolved in some cases.

IWEA also disagree with the proposals to change the change the charging policy for project coming off hold status. Again, this proposal does not belong in the ECP-1 decision as it was not proposed or consulted on.

Projects coming off hold should continue on existing charging with indexation as per existing agreements there is no justification for a change to this policy.

## 2.8 Longstop Dates

IWEA do not agree with the proposals to shorten the long stop dates for new connection offers. While IWEA agree that it is important that projects have a clear exit point if they are not delivered we do not believe that the existing policy requires any changes at this point.

Given that many renewable generation projects expect to participate in RESS auctions the delivery of those projects successful at auction will be determine by the frequency and volume of the auctions. Without this key information any decision to shorten the existing longstop dates could have unintended consequences especially for those projects which may have short shallow connection programs. Developers may need to participate in more than one auction before they are successful.

## 2.9 Firm Access

IWEA request that soon after the ECP-1 final decision and when the projects to be included in ECP-1 are identified EirGrid should begin planning for delivery of firm access. A detailed program should be made available to all ECP-1 projects of the ITC project program, the notification of ATRs and the timing of publication of constraint reports.

## 2.10 DS3 Prioritisation Ruleset

IWEA wish to support the principle laid out in Section 5.3 which states:

*"The selected DS3 Prioritisation eligibility criteria are such that service providers using new technologies are more likely to be prioritised for a connection offer"*

IWEA believe that the New Providers Portfolio is the more likely of the 2 scenarios for 2020 and its delivery will be key to ensuring the successful integration of high levels of wind and achieving the 75% SNSP operations limit. It is clear that new DS3 projects will need to connect over the next 2-3 years to achieve this goal and so they must be prioritised in this process.

### Batch Size

We note that the Total Cumulative MEC Threshold for this DS3 Prioritisation is set to 400MW and the reasoning for this is that:

*"The 400 MW threshold is the approximate size of Gate 1, which was the first of the new group processing systems. It is also the approximate size of the traditional largest single generation unit. "*

We wish to note that the critical consideration in relation to the MEC available for DS3 projects is how this process interacts with the DS3 procurement of Volume Capped Services in 2018. It is clear that an alignment is required between these processes.

Whether or not 400MW is an adequate batch size for DS3 grid depends on what volume of volume-capped DS3 services will be procured in 2018. We are working on the assumption that projects bidding in the procurement process will need to have some certainty of grid access in order to ensure that shovel-ready projects are awarded contracts and can deliver in a reasonable time-frame.

If 400MW of DS3 contracts are awarded then we think that it may be appropriate to increase the DS3 grid batch size so that 800MW of projects are in the DS3 grid offer process. If only 200MW of DS3 contracts will be awarded then the 400MW DS3 grid batch size would seem appropriate. The key point is to ensure that an adequate volume of projects are pre-qualified to tender so that the process is a competitive one and the situation does not arise where projects without grid are awarded DS3



contracts while projects with grid have not won contracts and have no ability to utilise that grid capacity.

A consultation is expected in January 2018 on the Volume Capped procurement process and we understand that this will, among other things, decide the following:

- Volume of Volume-Capped Services to be procured
- Pre-qualification criteria for bidding into this procurement process, including grid requirements

We would stress that this consultation needs to clarify the SOs proposals in relation to the interactions of the DS3 procurement process with the DS3 grid access process. In addition, it will be critical that the timelines for these processes are aligned so that, for example, if it is a volume-capped pre-qualification criterion to have a grid connection application 'deemed complete' then the SOs must ensure the procurement deadlines are such that the DS3 grid applications will have reached that milestone in time.

We would also like clarity on the following statement in Section 5.3:

*"The process shall be followed until the total cumulative MEC reaches 400 MW or the closest application below that number. In the event that the Total Cumulative MW Threshold is reached then the threshold shall be deemed to be at the last full application that meets the requirements and falls beneath the threshold. For example, if the number of qualifying applications totals 380 MW and the next application is 30 MW then that application would not be processed as it would exceed the threshold. Another application will not be included that does fall within the threshold. In this case therefore the threshold would be 380 MW"*

It seems to be a possibility that the last unit pushing over the limit could be 100MW therefore is it possible that only 301MW of the 400MW batch is used in this scenario? A worked example of this would be useful to clarify.

### Prioritisation Criteria

As a general point it is our assessment that the Level 1 Prioritisation is likely to be over-subscribed down as far as point (d) on planning at a minimum, so it is important that the remaining criteria are clearly laid out. In addition, section 3.3.2 of the ECP-1 Proposed Ruleset indicates that "where planning

permission is not required by the relevant planning authority, it is assumed to be granted for the purpose of the 2018 batch ruleset". In order to prevent gaming, we would suggest that some clearly verifiable rule is required around this point. We would suggest that where a developer is stating that a development doesn't require planning they should be required to provide a section 5 declaration from the relevant planning authority to that effect.

These criteria seem reasonable, but we would request clarification on the following points:

(d) *"Planning Permission: Applicants that have obtained relevant planning consents."*

We would ask for clarity around what is regarded as having the required consents and if this is intended to be similar to main ECP-1 ruleset

(e) *"Date of Expiration of Planning Permission: Applicants whose planning permission expires earlier will be prioritised."*

We would ask that this is changed to date of grant of permission in a similar way to the prioritisation we have proposed for the main ECP-1 ruleset

(f) *"Date order of the receipt of connection application"*

We would like to clarify if this is this Received Complete Date or simply date of receipt of initial application?

## 2.11 Suggested changes to Processing to improve ECP -1

IWEA request that connection method meetings are held with any generator processing under ECP-1. Early stage engagement with applicants will ensure that projects which are due to receive connection offers which are not commercially viable can have the opportunity to remove themselves from ECP-1 as soon as possible. Exit at an early stage should result in a refund of a percentage processing fees paid.

It would also be important that information on grid connection methods are shared with developers at the earliest possible time. This would give developers the opportunity (at their own risk) to advance works on any required planning permissions associated with their grid connections. Some planning permitted wind farms have been waiting an exceptionally long time for this process to commence and with planning permission end dates in sight, time could be critical to some of these projects.

### Need for a separate Review of ESNB system security and planning standards:

The processing of large volumes of solar generation in the past 2 years highlighted that the current network planning standards are not adequately equipped to recognise the generation profiles of newer technologies such as solar and batteries when conducting connection method studies.

## 3 Conclusion

IWEA welcomes the opportunity to make this submission on the Enduring Connection Policy Stage 1 (ECP-1) Proposed Decision and Ruleset. IWEA recommends that CRU considers these key points of IWEAs response:

1. Renewable generation must have priority in ECP-1.
2. Increasing the batch size for ECP-1 is crucial.
3. Retrospective change to the COPP relocation rule should not be allowed
4. Change to charging policy for shared assets is not required.
5. Prioritise projects based on date order of planning grant.
6. Change in ESNB processing fees is not necessary and unjustified.
7. Visibility of the post 2018 future processing needs to be released as soon as possible to prevent creating a new cliff-edge for connection applications

IWEA looks forward to continued engagement with the CRU in relation to the development of the Enduring Connection Policy and remains at your disposal should you have any questions in relation to this response.