



Commission for Regulation of Utilities
The Exchange
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Dublin 24

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Contact

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Re: System Services Future Arrangements

ScottishPower Renewables (SPR) is part of Iberdrola, one of the world's largest utilities and leading wind energy producer. ScottishPower Renewables is responsible for progressing the deployment of onshore wind projects in the UK and Ireland, and offshore windfarms throughout the world, managing the development, construction and operation of all projects.

We currently have over 30 operational windfarm sites with over 2GW installed capacity throughout the UK and Ireland, including our share in the 389 MW offshore windfarm West of Duddon Sands. In addition, we have a substantial development portfolio of onshore windfarms in the UK and Ireland and offshore wind projects in the East Anglia Zone, including the 714 MW East Anglia ONE project which is currently under construction. We are also developing battery storage projects in Ireland such as Gorman 50MW, participating in volume capped DS3 services, and Barnesmore BESS 3MW, aiming to enter into the volume uncapped DS3 services.

We therefore welcome the opportunity to respond to the consultation on System Services Future Arrangements Scoping Paper SEM-20-044.

SPR supports Energy Storage Ireland (ESI) response to the consultation and wishes to reiterate that the points raised in their consultation response are extremely important to facilitate the development of energy storage in Ireland.

As per ESI's response, we believe that the issues at stake here are extremely complex and require significant further engagement and consideration in order to put in place an optimal set of enduring arrangements.

We also believe the timelines set out to put in place a framework in advance of 2023 are extremely ambitious and the process to put in place a decision and implementation plan should not be rushed without sufficient discussion and oversight.

We believe a transition period between the current and future arrangements is needed. This will allow appropriate time for considered development of the enduring System Service arrangements. This transition period can still deliver new investment that is required to meet the changing needs of the system, and SPR will be working towards developing new projects if regulatory certainty is provided.



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The Regulators have the scope to extend the current arrangements by two periods of up to 18 months each. We believe this should be an option considered to allow time to transition to the enduring arrangements and for the SOs and industry to develop and learn new processes. We believe this can be progressed in parallel with options for Fixed Contract arrangements where new capability is needed on the system with an appropriate lead time. This would reduce the immediate uncertainty faced by investors and if combined with a budgetary glide path for DS3, that reflects the need for increasing SNSP limits, would help reduce the revenue risk faced by investors.

We would welcome discussion on any of the above and if you have any questions in relation to this response, please do not hesitate to contact me directly.

Yours sincerely

Ricardo Da Silva
Grid & Regulation Manager