

08th November 2022

emailed to Electricity Connection Policy, CRU (electricityconnectionpolicy@cru.ie) and Brian Mulhern (Brian.Mulhern@uregni.gov.uk)

Re: Consultation on Firm Access Methodology in Ireland “EirGrid – Proposed Methodology” (SEM-22-068)

Dear Brian and Electricity Connection Policy team at the CRU,

Obton Limited welcomes the opportunity to engage with the SEM Committee and respond to the consultation on Firm Access Methodology in Ireland “EirGrid – Proposed Methodology” (SEM-22-068).

Obton Limited is a joint venture between Shannon Energy and Obton A/S, an investment and development company with the goal of building a broad and risk-diverse portfolio of assets in the field of renewable energy. Obton Limited have a development pipeline of over 350 MW and aims to deliver up to 1 GW of renewable energy in Ireland.

Obton Limited fully supports the Irish Solar Energy Association (ISEA) response to the consultation and would like to highlight that the correct implementation of a fixed Firm Access Quantity (FAQ) date has the potential to provide investors certainty and more confidence on new renewable energy investment in Ireland and play an important role in the timely delivery of meeting Ireland’s 2030 renewable electricity targets.

We support the positions taken by ISEA and wish to reiterate that we strongly welcome the change in approach set out in EirGrid’s proposed methodology.

Response to Question 18 posed in the Consultation Paper:

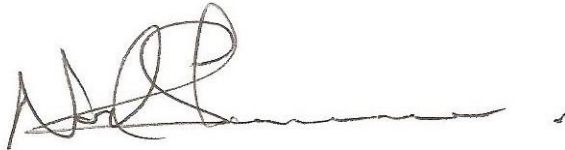
Consultation Q. 18: Comments are invited from interested parties on the benefit of providing firm access to connected legacy generation in Ireland which currently have non-firm access. Should legacy non firm generators be considered in any new firm access methodology? Please provide rationale to support this.

As an existing solar developer with a large solar PV pipeline in Ireland, we strongly agree that legacy non-firm generators with ECP contracted offers should be considered in the new firm access methodology, however, the “EirGrid – Proposed Methodology” does not distinguish between legacy contracted generators with non-firm access, and future generators.

We believe it is critical and fair that connection agreements contracted under ECP and non-GPA batches be included in the allocation of firm access. Clarity around timelines on a clear methodology and when committed/future generators will have a fixed 'FAQ', is published well in advance of the RESS-3 auction in 2023 would be welcomed.

In conclusion, we would like to thank the SEM Committee for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Yours faithfully,



Noel Shannon

Director,
Obton Limited