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SEMC

8<sup>th</sup> November 2022

### **Consultation on the proposed new Firm Access Methodology in Ireland – SEM-22-068**

Dear Sir /Madam,

Thank you for providing RWE Renewables Ireland the opportunity to respond to the above consultation. RWE Renewables, a subsidiary of RWE has been active in Ireland since 2016 and now has two offices: one in Kilkenny City and one in Dun Laoghaire, County Dublin. RWE Renewables has already earmarked up to €1.5 billion [gross] for Ireland up to 2030 through current projects already being developed. The investment will be across its portfolio of renewable energy businesses in onshore wind, offshore wind, solar, and battery storage. RWE Renewables is part of RWE - a leading **global** energy player, with a 38GW global generating capacity and 18,200 employees worldwide and is one of the world's leading renewable energy companies. RWE has recently confirmed it will acquire Con Edison Clean Energy Businesses in the United States.

#### **Key Messages**

- **A separate solution will be required for the Phase 1 offshore wind sites seeking to bid into the first ORESS auction in Q1 2023 – EirGrid must be directed to complete the look ahead process for each Phase 1 project seeking to participate in ORESS1 before the end of December 2022.**
  - **If this work cannot be completed before the end of 2022**, then we urgently recommend that the Regulator directs EirGrid to confirm that Phase 1 projects in ORESS1 **will be granted the deemed time bound deemed Firm Access date of 1 January 2030**, (not subject to the proposed Firm Threshold test), in line with the purpose and policy direction set out in the Shaping Our Electricity Future (SOEF) publication.
  - **and** this must be confirmed on or before 31 December 2022 in order for projects to have sufficient certainty to proceed with prequalification for ORESS1, enabling these projects to build at a price that doesn't place unnecessary and additional costs on consumers.

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- Clarity is urgently needed on many aspects of the proposal but in principle we support the proposed EirGrid Firm Access methodology and urge the regulatory authorities and EirGrid to confirm how and when the revised approaches will be implemented.
- Any proposals to allocate Firm Capacity must include battery storage.
- Once the time bound deemed Firm Access has been granted, financial compensation payable in the event that the site is constrained off must be for 100% of the lost output.
- A “**Use it or Lose it**” approach must be applied to the provision of deemed Firm Access. Longstop dates/milestones should be incorporated into the Connection Offer/Agreement, where failure to achieve such dates would result in a project losing allocated Firm Access but not their connection, in order to prevent grid hoarding by projects which cannot or do not choose to proceed with construction.

If you have any questions regarding these, please do not hesitate to contact me or our Senior Regulatory Affairs Manager, Kate Garth ([kate.garth@rwe.com](mailto:kate.garth@rwe.com)).

Yours faithfully

Cathal Hennessy

RWE Country Chair  
RWE Renewables Ireland

**Q1) Comments are invited from interested parties on EG's proposed approach of having a time bound Firm Access date. Comments also invited on alternative options (i.e., ATRs). Should scheduled FAQ dates be linked with ATRs with more targeted delivery incentives. Please provide reasons and rationale for any views provided.**

We support the revised approach set out in the EirGrid Firm Access Methodology Proposal (FAMP) of having a time bound Firm Access date. This new methodology would reduce the current disparities between older generation with firm access and new generation (ECP) that currently are non-firm, with no visibility of how and or when firm access might be granted.

We agree with the principle that the risk of delays to planned Reinforcements should not be borne by the developer and instead those risks be decoupled and managed by EirGrid.

The issue that needs to be addressed urgently, is how quickly can the new methodology be implemented, and what are the implications for this on developers seeking to bid into the first Offshore Auction early 2023 and developers seeking to bid into RESS3 auction in mid 2023.

**Q2) Comments are invited from respondents regarding EG's historical performance on delivering ATRs. How can EG's performance be improved? Please provide reasons and rationale for any views provided.**

We are less concerned with the review of EirGrid's historical performance on delivering ATRs – and instead focus on the ability of EirGrid to deliver the necessary reinforcements and operational solutions which will enable Ireland to achieve its medium term (2030) decarbonisation and renewables target and ensure the achievement of the net zero target (latest 2050).

For this to be a reality, it is critical that EirGrid be allowed to deliver Anticipatory Investment in the Irish grid. This would enable EirGrid to start the development and consenting process in advance of having firm connection agreements signed with generators. The Regulatory Authorities must enable EirGrid and ESB Networks to have the necessary capital allocation to start the development projects.

This is not simply an issue for generation but will also apply for new demand connections, which will remain critical for continued economic growth in Ireland.

**Q3) Comments are invited on whether stakeholders agree with the proposed approach of allocating partial FAQs. Please provide reasons and rationale for any views provided.**

We agree with approach that would enable the allocation of partially firm capacity, where this is possible. We agree with the proposal that partial firm access (if it cannot all be allocated) should be in discrete blocks and if the 20MW is the smallest block that EirGrid's available system modelling resources can accommodate, then we agree that this is a far better option than the original "all or nothing" approach set out in the December 2021 methodology.

**Q4) Comments are invited from respondents on the proposed approach of allocating Firm Access to generators once they reach committed project phase (progress beyond Consents Issue Date). Please provide reasons and rationale for any views provided.**

As noted previously, enabling projects to be provided their deemed Firm Access date (rather than being dependent on the completion of the ATRs) is an improvement on the current status quo set out in ECP, whereby all the connection offers are currently non-firm; with no route to be allocated any Firm Access.

We welcome the improvements in EirGrid's methodology which would result in EirGrid providing the deemed Firm Access date earlier than at the date of the site's connection. In principle, using the Consents Issue Date could be appropriate for **onshore connections**, given that the project would have full development consent and onshore developers cannot apply for a grid connection offer without full development consent.

However, this is not the case for offshore developments and waiting until the Consents Issue Date will create a significant, and potentially insurmountable issues for the Phase 1 projects, given the long gap between the proposed ORESS1 auction (currently scheduled to start in Q1 2023) and the expected development consent approval.

**If project developers do not receive any visibility and certainty regarding their deemed firm access date in advance of the ORESS1 auction qualification date, at best, developers would need to include additional risk premia into any ORESS bids submitted to mitigate the risk that a higher proportion of their generation will be constrained off for longer, than might be the case. At worst,** developers may not be able to meet the requirement to submit an auction bid below the current Administered strike price of €120/MWh, which could result in the auction not being able to run.

EirGrid is currently reviewing and expected to publish its revised Shaping Our Electricity Future v.1.1. in January 2023, in order to meet the new 2030 targets of 80% of final electricity demand to be supplied through renewable electricity and the legally binding carbon budgets, additional network reinforcement and operational changes will be required.

**Therefore, to mitigate the risk for Phase 1 projects seeking to participate in the ORESS1 auction, we suggest the following solution.**

- **EirGrid must be directed to complete the look ahead process for each Phase 1 project seeking to participate in ORESS1 and confirm the time bound Firm Access date before the end of December 2022**
- **If this work cannot be completed before the end of 2022,** then EirGrid must provide each Phase 1 offshore project with a **Time Bound deemed Firm Access date of 1<sup>st</sup> January 2030**, and that this confirmation is provided on or before 31<sup>st</sup> December 2022, so that the Phase 1 projects can incorporate this into their financial modelling and get Board approval before the prequalification period and ORESS1 bid bonds on 1<sup>st</sup> February 2023.
- Compensation for Firm Access will be calculated at 100% of the lost revenues from that date.

- As part of the proposed ongoing Annual Review process, following achievement of Consents Issue Date, **if the calculation for firm access results in an earlier date than 1 January 2030**, then the deemed firm access date would be confirmed **as the earlier of the two dates** (either the 1st January 2030 or the deemed date following the estimated completion of all planned reinforcements).

In addition to the fundamental issue regarding the Phase 1 offshore connections bidding into ORESS1, we have several questions regarding procedural issues with the proposal solution for the onshore connections which will need to be mitigated:

Currently, the proposals as written are vague and greater clarity is required with the definition of having reached the “committed project phase (progress beyond Consents Issue Date)”.

Given that the Consents Issue Date CID will be the trigger for projects to be eligible to receive their deemed firm access date, and as importantly, will form the criteria for the prioritisation of the project’s “*place in the firm access queue*”.

We recommend payment **of the second stage payment would constitute the project having achieved “Committed status”** and will then be included in the next Annual Review for allocation of Firm Access.

***Q5) Comments are invited from respondents on the inclusion of a longstop date with awarded FAQs. Please provide reasons and rationale for any views provided.***

We agree with the inclusion of a long stop date on any awarded FAQs and note these replicates what is already in the Connection Agreement. We are not entirely clear what is assumed to be different in the approach of a long stop date for the Deemed Firm Access date and the inclusion of long stop dates in the Connection Agreements granted for Phase 3 projects and earlier.

We agree that the use of longstop dates is **both justifiable and necessary**, as (if utilised properly), it will avoid the hoarding of limited, and valuable firm access. This is particularly important for projects which are proceeding in line with their milestones, and which would otherwise be allocated firm access (or a partial firm access) but can’t because they are located close to a project with guaranteed firm access which has not progressed.

The fair and unambiguous application of the longstop date (in relation to the Deemed Firm Access) date must be applied and regular status updates published. The revocation of any Deemed Firm Access date should not impact the connection offer but would result in the project having to re-enter the Annual Review process if the previous longstop dates were missed.

For projects which were successful in either RESS or ORESS, the longstop dates could align with the specified delivery milestones, and importantly, these must be rigorously maintained, with EirGrid (and ESBN) applying the loss of deemed firm access if the agreed milestones are missed. **In effect a “Use it or Lose it” approach.**

This new regime **must not result in a similar situation** to that outlined in section 2.2 [Level of firm versus non-firm generation in Ireland], which confirms that there is ca. 400MW of wind

generation which has still not connected but has full Firm Access, and ca. 500MW of contracted generation which is still not connected.

***Q6) Comments are invited from respondents on the proposed approach of treating batteries and other service providers as outside the scope of the Firm Access methodology. Please provide reasons and rationale for views provided.***

The consultation suggests that Firm Access status is not applicable to a service provider (unlike a generator) unfortunately, this perspective ignores the reality that battery storage units will need to participate across all revenue streams, including the wholesale market, capacity market as well as FASS revenues, and therefore an approach which excludes storage from 2 of the 3 future revenue streams will create distortion and risk loss of investment. Basing the forward-looking approach on the business model of the past is not an equitable nor sensible approach to ensure future investment.

The original CRU proposal was intended to include batteries and other service providers. Given these assets can be competing with conventional generation for Capacity Market and within the Future Arrangements for System Services (FASS) it seems inequitable that those providers could be assigned firm access but not batteries.

We would also note that the current proposals set out by EirGrid within the Scheduling & Dispatch Programme confirms that delivery of SDP2 - *Energy Storage Power Station Integration* is designed to deliver full functionality to batteries as is available to Pumped Storage – to provide more opportunities for energy storage units. Given that battery storage projects are required to hold a generation licence, there seems no justification for excluding battery storage sites from being granted Firm Access, and as is planned, in future ESPS sites can fully participate within the market- it would be discriminatory were such sites to be constrained down without compensation and risking imbalance costs, to which other licenced generators are not exposed.

We would also seek confirmation as to how hybrid sites will be treated in terms of Firm Access and if these will be included. Given the potential benefits [fully utilising all available capacity, delivering additional renewable generation] we would strongly urge SEMC to consider hybrid sites will be eligible.

***Q7) Comments are invited from respondents on the proposed approach of having a MEC floor of 1MW. Please provide reasons and rationale for any views provided.***

We agree with the principle of aligning the 1MW level to the current controllable limit, and if that level were to change, we recommend there shouldn't necessarily be an automatic change to the 1MW floor level given the likely resource requirements that could be required if the MEC floor were to be lowered and much smaller sites need to be modelled for Firm Access.

***Q8) Comments are invited from respondents on the Annual Review process. Please provide reasons and rationale for any views provided.***

We agree with the comments already made by the Regulatory Authorities, namely that more detail on the Annual Review process is required, and we would confirm this is an urgent requirement.

In the absence of a workshop or engagement with EirGrid to discuss the Firm Access Methodology, we have the following questions that must be addressed in the final decision, alongside our suggested mitigation approach.

- When can the first Annual Review of Committed Generators take place – does EirGrid already have all the necessary information to conduct the first review following the decision by SEMC?
  - *We would urge EirGrid to commit to undertaking the first Annual Review (look back and forward) ASAP – and as a minimum in advance of the next ECP batch to provide greater clarity on future grid availability.*
- Will the Annual Review take place at a regular and specified date each year (similar to the ECP batch window taking place in September)?
  - *We would recommend it does to provide certainty to all applicants and to ensure a consistent and updated approach can be maintained.*
- At what point does the Annual Review process consider the projects which have reached the Committed Phase stage?
  - *If the Annual Review process takes place at a set time, then we would suggest any projects that have met CID on the last working day of the month (or date) for the Annual Review are included.*
- Will existing non-firm connected generators (connections granted through the Enduring Connection Process (ECP) receive an allocated Firm Access date in advance of newly “committed generation?”
- Clarity also required how and where potential developers can access this information – which is expected to provide locational signals for future connection.
- Who / what will oversee the accuracy of the information?
  - *It is vitally important that the information contained and published is accurate and maintained in a timely manner, as developers will seek early indications of the forward-looking views on likely constraint levels and areas for better [firmer] connection.*
  - *CRU must oversee the provision of this information with suitable incentives and penalties applied.*
- What additional resources will be available to EirGrid to deliver this in a consistent manner on time and to specified quality standards?
- What is the proposed methodology to allocate firm access to connected and Committed projects whereby there is insufficient to provide this to all projects, especially in the first Annual Review / what would the tie-break be?

- *We would recommend that in the event of insufficient firm access that the available Firm Access be pro-rated across connected generation and committed generation.*
- How will the use of longstop dates be incorporated into the Look Back and Look Forward analysis undertaken?
  - *The look back and look forward analysis is expected to consider existing projects confirmed in the Transmission Development Plan, it is currently unclear how the new Network Delivery Portfolio will feed into the wider process*
- Figure 3 in the consultation sets out EirGrid’s methodology for the Firm Access Annual Review: – what is the purpose for the System wide constraints “low” and what would the threshold for that be and how will this be measured? [as constraints refer to local network and the Firm Access Methodology confirms that:]
  - *“Constraining of generation is location-specific and can be reduced by transmission network reinforcements. Some transmission constraints might only exist temporarily due to transmission lines being taken out of service for maintenance or uprating. **For the purpose of allocating Firm Access, the focus is on single contingency events (N-1) as opposed to issues that occur during system maintenance.***
  - *We would recommend that the same; [5%] Firm Access Threshold be applied across Ireland, to avoid any unintended market distortion.*

**Q9) Comments are invited from respondents on the Firm Threshold. Please provide comments and rationale for any views provided**

The EirGrid proposal does not contain any reference to the likely level of the Firm Threshold to be used, nor on what basis that variable could be revised on an annual basis. This needs to be clarified ASAP.

Moreover, we are very concerned that in the consultation (section Firm Threshold, EirGrid proposal), the text states:

*“the introduction of a Firm Threshold. This firm access test for **renewable energy sources** will consider a minimum level of acceptable constraint”.*

For the purposes of allocating Firm and / or Partial Firm Access to all generators connecting or connected within Ireland, it is fundamentally important that the ability (and right) to export up to your FAQ **is the same, irrespective of technology class or owner.**

As well as seeking clarity on the level of the Firm Threshold (or level of acceptable constraint for all generators) we would advocate that the Firm Threshold level be set at **5% (as a minimum)** - which we note is aligned to the assumed level of constraints set out in the Shaping Our Electricity Future v1 (Dec 2021), which noted:



*“Assuming that the generation connects as expected, and that the reinforcements are in place by 2030, the levels of constraint will be minimised. For 2030, this is expected to be of the order of 5%”.<sup>1</sup>*

Once a site has been granted a deemed Firm Date, (as the constraints are assumed to be below the Firm Threshold), **in the event that the site is constrained off due to local network issues, the financial compensation payable will be for the 100% of the constrained total.**

***Q10) Comments are invited from interested parties on the approach of First to be Committed – first to be Firm. Please provide reasons and rationale for any views provided.***

We agree that the proposed change from **First to be Connected** (as per the Dec 21) methodology to **the First to be Committed** is very positive and we agree that this would provide the fairest and most transparent approach to capacity allocation, **provided that** there is full transparency around how and when projects will be deemed to have achieved the Committed Phase (please see our response to question 4).

However, for this approach to work in a fair and non-discriminatory way, it will be contingent on the accurate and timing process of Annual Reviews, and the adherence to and implementation of longstop dates, which could and would result in the project losing its Firm Access status of date of Deemed Firm Access if the relevant milestones were missed.

***Q11) Comments are invited from respondents on the use of the Transmission Development Plan as part of the Firm Access methodology. Please provide reasons and rationale for any views provided.***

**In principle**, we support the proposal to use the latest Transmission Development Plan (TDP) - alongside the reinforcements set out in EirGrid’s Shaping Our Electricity Future (SOEF) publication v1 and shortly v.1.1. as the basis to determine the scheduled FAQs. Using the reinforcements listed and their expected completion dates for the scheduled reinforcements (which have achieved step 4 of the 6-step programme) will provide a clear and transparent signal of current and anticipated future constraints, providing increased investor certainty.

- It is however unclear how the timing of the TDP process will interplay with the Annual Review process – clarity on this is urgently required.

However, we have previously raised concerns regarding the data freeze date used in the production of the annual TDP (i.e., the data freeze date is usually the 1<sup>st</sup> January of the preceding year). Given the potential data lag, this could potentially over, or underestimate the likely level of constraints in different regions, with an attendant impact on the locational signals provided.

As noted above, it will be critical to ensure that any reinforcements flagged within the SOEF framework are considered as binding [for the purposes of modelling constraints] as the TDP – given the SOEF is currently being updated to reflect the changing policy and legislative frameworks for new renewable capacity and legally binding carbon budgets (announced in

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<sup>1</sup> [https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping\\_Our\\_Electricity\\_Future\\_Roadmap.pdf](https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping_Our_Electricity_Future_Roadmap.pdf) (page 80)

Summer 220, which have not yet been factored into the TDP – and on the basis of the data lag *might* not be included until the TDP that is issued in 2024.

Although we are responding solely on the basis of the Irish market, we note question 19 refers to the applicability of this Firm Access methodology in Northern Ireland. We would then be concerned that the proposal currently under consultation in Northern Ireland on whether SONI should only produce its TDP every 2 years, would make this application harder and more importantly, that it could result in EirGrid also seeking to only produce the TDP once every 2 years.

***Q12) Comments are invited from respondents on the proposed look back and look-forward approach, and the interaction between these steps. Please provide reasons and rationale for any views provided.***

As per our response to Question 11) we agree with the principle proposed and agree that the same methodology is due to be used for both look back and look-forward on an annual basis, however the remains- What is the timing for this – will the look back and reconciliation with changes to the TDP be done as part of the same process, or if not, which would come first, and how would those dates align with any future ECP batch dates?

***Q13) Comments are invited from interested parties on the interaction of delivery incentives with the proposed Firm Access methodology. Please provide reasons and rationale for any views provided.***

We are less concerned that there are not [yet] any explicit incentives of penalties facing EirGrid as TSO or ESNB (as TAO) associated with the delivery of the planned reinforcement works which would be the outcome of the proposed Firm Access Methodology.

We would however have concerns if the use of penalties / incentives caused resulted in additional buffer time / contingencies to be included in the assumed delivery dates for the required reinforcements. We note that the purpose behind the recent review and planned revision of SOEF was specifically designed to ensure that Ireland can meet its targets to deliver the increased target of 80% final electricity demand to come from renewables and support decarbonisation of the electricity industry by 2030. **The planned reinforcements must align** with those overarching targets, and therefore there cannot be any safety buffers or additional contingency built into the estimated completion dates provided for the planned reinforcements – as this would also undermine investor confidence.

Whilst it is true that delays between the original estimated delivery date and the completion of system reinforcements can and do happen. However, the impacts of those delays are primarily on the generators who are unable to connect and customers who have to pay for the consequences of those delays.

We would therefore suggest the following principles:

- Reinforcements / projects which have been included within the TDP or SOEF equivalent (i.e. have reached step 4 - capital allocated and an estimated completion date confirmed) that will be the date of that reinforcement used for the Annual Review process.

- Any delays to the estimated completion date thereafter will be reflected in the potential increase in constraint costs recouped via the imperfections charges.
- EirGrid must consider the likely cost of higher imperfections charges whilst re-evaluating estimated completion dates and whether the Cost Benefit Analysis would justify additional resources to expedite / ensure the project remains on track.
- Closer monitoring by the CRU in terms of the effective interactions between TSO and ESBN and wider stakeholders regarding the construction and delivery of the planned reinforcement

***Q14) Views are invited from interested parties on how the TSO should be incentivised to alleviate constraints. Please provide reasons and rationale for any views provided.***

It is important that any incentives (or penalties) which relate to the alleviation of constraints are applied to both the TSO and TAO (ESB N).

A critical measure by which CRU and or SEMC will be able to ensure delivery of measures that reduce both the time and level of constraints will be the regular publication of progress updates on key milestones associated with the delivery of planned reinforcements, by both the TSO and TAO (ESB N).

We would also request clarity on how the various TSO publications; including but not limited to, the Tomorrow's Energy Scenarios (TES) and the Network Delivery Portfolio will feed into / align with the reinforcements listed in the Transmission Development Plan.

It is imperative that CRU and industry have regular oversight / visibility on both the monitoring of progress to delivery reinforcements and the proposed (thereafter implemented) mitigation plans when issues that impact the estimated completion date are detected.

***Q15) Comments are invited from respondents on the need for independent assurance around the Firm Access process. Please rationale to support these views.***

As per our responses to previous questions, we believe a key deliverable of this process will be the openness and transparency provided to Committed and potential projects of the level of and timing for Firm Access within specific locations. If the level of information availability and transparency is delivered and maintained, we do not believe there would be a need for an Independent Monitor to oversee this process, and we would expect that CRU would deliver this assessment as part of their wider governance and assurance roles associated with the Price Control and ECP frameworks.

We believe requiring the set-up of an independent assurance body would also delay the implementation of the new process, and therefore we are less supportive of this approach.

***Q16) Comments are invited from interested parties on whether they agree with EirGrid's proposed Firm Access methodology, should a party disagree with EirGrid's approach, Please provide reasons and rationale for this.***

As per our response to the previous questions, we are supportive of EirGrid's proposed Firm Access methodology for onshore projects and our concerns relate mainly to the lack of detail in some areas and the proposed implementation timeframes. In our response to question 4 we set out an alternative proposal to balance the risk to the first ORESS1 auction, given the inability for projects to mitigate the risk in any other way.

**Q17) Suggestions and or alternative approaches are invited from interested parties on EirGrid's proposal. Please provide rationale to support this.**

As noted previously, we strongly urge SEMC to facilitate a separate process for the first Offshore RESS auction, thereby ensuring all Phase 1 projects can compete within ORESS1. To deliver this we suggest:

- **EirGrid must be directed to complete the look ahead process for each Phase 1 project seeking to participate in ORESS1 before the end of December 2022.**
- **If this work cannot be completed before the end of 2022, then Phase 1 offshore projects seeking prequalification for the ORESS1 auction should be granted a deemed Time Bound Firm Access date of 1<sup>st</sup> January 2030** - which reflects the intention of SOEF reinforcements and delivers the Government's clear policy objectives and supports delivery of the legal binding carbon budgets.
- Once the successful ORESS1 participant has reached Consents Issue Date, should the Annual Review for Firm Access result in an earlier (than 1<sup>st</sup> January 2030) Deemed Firm Date, then the individual project will be granted that earlier date, otherwise the 1<sup>st</sup> January 2030 date will remain.

**Q18) Comments are invited from interested parties on the benefits 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 for this.**

Note, for the purposes of responding to this consultation, we assume legacy generation to be connected projects, whose connection offer pre-dates the Enduring Connection Policy process.

We believe it is important for all ECP connected projects to be included in the Annual Review Look Back process so that they can be allocated full or partial Firm Capacity, where this is available.

For older legacy projects (Gate 3 and earlier), which have connected and are operational, there are several issues that will need to be considered, including the benefits of providing the locational signal to not connect in highly congested areas.

However, there are clearly issues of fairness and for projects whose Firm Capacity was dependent upon ATRs which remain significantly delayed or potentially have been dropped, it is unclear how their Firm Access could ever be granted.

In terms of allowing these projects to be included in the new Firm Access Methodology, great care should be taken to ensure that – if they were to be included; that they are all issued with the same “committed” date so that if there is any additional available Firm Access available, this is pro rata’d to all legacy projects, rather than being allocated based on the date of their connection / energisation.

***Q19) Comments are invited from respondents on the need to consider this proposed methodology in relation to the equivalent approach taken in N Ireland. Do respondents have any views on the interactions and differences between these different approaches?***

We do not have a view on an equivalent approach taken in Northern Ireland – but we would urge the SEMC to ensure there is no delay to their decision and thereafter implementation of the new proposals in Ireland, given the upcoming RESS auctions and the urgent need (first set out by CRU in 2020) that EirGrid design a new Firm Access Methodology. Further delays to the decision would be unacceptable.