

**IWEA Response to Consultation Paper on Detail for Allocating Scheduled
Firm Access in Gate 3 ITC Programme
CER/09/169**

This consultation deals with two principal issues in relation to the detail of the allocation of scheduled firm capacity in the ITC Programme, which is used as part of Gate 3. It is important to note that the issues presented do not affect which renewable projects will be made an offer under Gate 3 as this has already been determined on the basis of the date all necessary information was provided to the system operator.

Issue 1: Date Order Definition in ITC Programme

IWEA have reviewed the arguments presented and, given the rationale presented by the CER, believe that the only option available is to agree to the using of “initial application received” dates in the ITC Programme for renewables in Gate 3.

The principal reasons for this decision are as follows:

- There is no impact to the Gate 3 offer program, however any changes requiring re-running of the ITC programme could delay all Gate 3 applicants by approx 6-9 months and could adversely impact on the timely connection of more renewable generation onto the network.
- The System Operators indicate that the “initial application received” date is simple and consistently verifiable. This approach then is easily open to transparent audit. In this context IWEA would also like to request that an independent audit of the ITC Programme be carried out, the results of which should be made publicly available as soon as is practical.
- There is a lack of consistency in the criteria used to assess applications on receipt, e.g. in determining what is necessary information within and across each System Operator. We also note that the system operators suggest it would not be feasible to come up with a single verifiable and consistent system for checking for “receipt dates” over the period of 2004-2007.
- The use of the “initial application received” date corresponds to the dates given in Appendix 1 of the Gate 3 Direction.

Issue 2: Same Date Applications in ITC Programme

A query was also presented regarding the allocation of scheduled firm capacity in the ITC Programme from applications with the same application date, where the capacity is deemed to be interchangeable between them.

There are three scenarios which relate to where renewable applicants in the ITC Programme have the same “initial application received” date and are deemed by EirGrid to be interchangeable in terms of the allocation of scheduled firm capacity. IWEA support the proposals presented by the CER in the consultation paper as per below with some small clarifications.

- **Applications for “MW phases” for the same site from the same applicant**

Should have scheduled firm capacity allocated in the ITC Programme in line with the order of the phased developments. The developer will decide which of its phased applications receives priority if not currently identified.

- **Applications for different sites from the same applicant**

Should have available scheduled capacity in the ITC Programme shared, either equally or pro-rata between them, up to their full capacity applied for. Whether the equal or pro-rata approach would apply would be decided on by the applicant.

It is noted however that the consultation paper indicates that whether the equal or pro-rata approach would apply would be decided on by the applicant, which is to inform the system operator of its preferred approach within **one week** of this paper so as not to delay the running of the ITC Programme. It is also noted that in the absence of correspondence from an applicant on this issue - within one week of this paper - the system operator will use the pro-rata approach as a default.

However IWEA assume the intention was that the clarification would be required **one week from the publication of this decision**. IWEA would also request that the system operator will contact the relevant applicants on publication of this decision as to their preferred approach so as not to delay the running of the ITC Programme.

- **Applications (for the same or different sites) from different applicants**

Should have available scheduled firm capacity allocated in the ITC Programme on a pro-rata basis.