

The new Irish Grid Connection Policy for Onshore Generation and System Services

The Commission for Regulation of Utilities (“**CRU**”) recently published its [Decision Paper](#) on its new Electricity Connection Policy – Generation and System Services (“**ECP-GSS**”). ECP GSS aims to accelerate the process for obtaining grid connection offers for onshore generation and system services assets. The new policy will be implemented in 2025.

Delay in obtaining grid connection offers is currently a significant risk for project developers. ECP-GSS seeks to reduce timelines associated with grid connections by establishing bi-annual application windows and introduces timelines for offers.

In this note, we set out the key changes in this new policy.

RED III and Grid Connection

The ECP-GSS is reflective of the EU’s requirement to streamline permit-granting procedures for renewable energy projects and related grid infrastructure. Grid connection is included in the permit-granting procedures. The [Renewable Energy Directive](#) (“**RED III**”) generally requires that all permitting to build, repower and operate renewable energy plants must occur within 12 months for renewable energy projects located in renewables acceleration areas (none of which have been declared yet by the State) and 24 months for renewable energy projects located outside renewables acceleration areas and offshore renewable energy projects. Ireland does not currently meet these timelines.



ECP-GSS establishes different connection pathways for projects covered by RED III (i.e., renewable projects and co-located storage projects (“**RED III projects**”)) and projects not covered by RED III (for example conventional projects, non-co-located storage projects or other system services technology projects (“**non-RED III projects**”)).

Grid Applications and Connection Offers

ECP-GSS introduces two application windows per year. The first “Batch Closing Deadline” under ECP-GSS will be 30 September 2025. Following this first batch, Batch Closing Deadlines will occur every 31 March and 30 September.

RED III projects must enter a “**Pre-engagement Process**” with the relevant System Operator (“**SO**”) prior to the relevant Batch Closing Deadline. The SO will deliver a non-binding High-level Technical Assessment that must be included in the project’s grid application.

The grid application for a RED III project may be submitted at any time prior to the Batch Closing Deadline, subject to the:

- application containing a valid High-level Technical Assessment; and
- the planning authority acknowledging the project’s planning application has been submitted and is complete. This is a key change as previously planning permission for the project was required prior to applying for grid connection.

A complete grid application for a RED III project requires that the grid application be submitted within 15 days of the acknowledgement of completeness of the planning application. If this timeline is not met, the CRU states that the overall permit-granting procedure timelines set out in RED III might cease to apply. It is expected that projects will pay an application fee deposit for the Pre-engagement Process. Upon application to the batch, the balance of the application fee (minus the deposit) will be payable.

For a non-RED III project, planning permission is required before a grid application may be submitted to the SO. Grid applications may be submitted at any time prior to the “Batch Closing Deadline”, subject to planning permission being granted. In addition, the full application fee is payable upon application.

There are no caps on the number of applications or entries into a batch under ECP-GSS. This is an important change as previously there was a limit on the number of projects to be processed within each batch. However, a cap may be

introduced by the CRU if there is a significant increase in applications causing delays to the processing of applications.

Processing of Grid Applications

Upon receipt of a grid application, the SO will assess the validity of the application and will confirm the application as valid or invalid within 45 calendar days. If valid, the application is “Batch Qualified”. If an application is not valid and the Batch Closing Deadline has not yet passed, the SO will request that a valid application is submitted. A valid application must be submitted by the Batch Closing Deadline.

Following this, the SOs will have a further 15 days to publish the final list of Batch Qualified applicants (the “**Batch Publication Date**”). The list may change if a project does not proceed or is deemed ineligible.

The SOs will undertake a connection study and issue a Connection Offer once completed, ensuring adherence to RED III timelines where relevant and being “cognisant” of other permits requiring a completed grid offer process (e.g. Licence to Generate). The applicant has 60 calendar days to accept the Connection Offer.

Planning permission must be received for all projects including RED III projects prior to Connection Offer acceptance. If planning permission has not been received within 60 calendar days of offer issuance, the Connection Offer will lapse.

Repowering of Projects

The ECP-GSS also contains particular provisions for repowering renewable projects.

- If a renewable project seeks to repower with no increase to the Maximum Export Capacity (“**MEC**”), the existing process for modifications to generation connection offers will apply. The Connection Offer will be issued within 3 months unless the SO identifies justified safety concerns or technical incompatibilities in which case the Connection Offer will be issued within 9 months of the acknowledgement of completeness of the valid grid application, subject to resolution of the issues.
- If a renewable project seeks to repower with an increase in MEC of less than 15% of existing capacity, the project must enter the Pre-engagement Process. If the Pre-engagement Process does not identify safety concerns or technical incompatibilities, the project’s application for grid connection occurs outside the batch process. The Connection Offer will be issued within 3 months. However, if safety or technical issues are identified, the project will be treated as a renewable project and must apply into

the batch process set out above. This means that the Connection Offer will be issued within 9 months of the acknowledgement of completeness of the valid Grid Application.

- If a renewable project seeks to repower with an increase in MEC greater than 15% of existing capacity, the project must enter the Pre-engagement Process and apply into the batch process set out above.

Once their Connection Offer is issued, the repowering applicant has 60 calendar days to accept. Planning consents must be received prior to Connection Offer acceptance.

Storage Projects

An energy storage facility combined with a facility producing renewable energy and connected to the same grid access point, which is located on an existing renewable energy site will follow the process for RED III projects. However, Connection Offers for co-located energy storage projects on existing renewable energy sites will be issued within 9 months of the acknowledgement of completeness of the valid grid application. Energy storage projects which are not co-located will follow the process for non-RED III projects.



New hybrid projects comprising a mix of renewable energy technologies or renewable energy combined with co-located storage will be considered as RED III projects for the purposes of processing applications and are required to apply through the batch process.

Capacity Market Projects

Projects that have received capacity market contracts are expected to apply for grid connection through the ECP-GSS process described above.

Conclusion

The new grid connection policy for generation and system services assets is a welcome step. Additional application windows and running the grid and planning processes in parallel, to a certain extent, will certainly assist in getting more renewables on the grid. The key point now is to ensure the System Operators have sufficient resources to process and issue connection offers and ultimately energise these crucial projects in a timely manner.

Contacts



Niall Donnelly
PARTNER

+353 (0) 1 237 3700
ndonnelly@philiplee.ie
[Niall Donnelly](#)



Lev Gantly
PARTNER

+353 (0) 1 237 3700
lgantly@philiplee.ie
[Lev Gantly](#)



Alice Whittaker
PARTNER

+353 (0) 1 237 3700
awhittaker@philiplee.ie
[Alice Whittaker](#)



Eoghan Doyle
PARTNER

+353 (0) 1 237 3700
edoyle@philiplee.ie
[Eoghan Doyle](#)



Alison Hardiman
CONSULTANT

+353 (0) 1 237 3700
ahardiman@philiplee.ie
[Alison Hardiman](#)



Max Bail
ASSOCIATE

+353 (0) 1 237 3700
mbail@philiplee.ie
[Max Bail](#)