

PUBLIC CONSULTATION ON A MICRO-GENERATION SUPPORT SCHEME IN IRELAND 2021

Department of the Environment, Climate and Communications

Irish Solar Energy Association response

INTRODUCTION

The Irish Solar Energy Association (ISEA) appreciates the opportunity to respond to the Department of the Environment, Climate and Communications (DECC) public consultation on a Micro-generation Support Scheme (MSS) in Ireland

ISEA is the leading voice for the Irish solar industry. The association is working to advance a policy and regulatory landscape to promote solar PV as a leading technology that can assist in the decarbonisation of Ireland's electricity system and contribute to a successful and resilient clean economy. ISEA mission is 'Deliver a Brighter Sustainable Future for Ireland' and we currently have a membership of 119 businesses representing solution providers, local agencies, manufacturers, developers, renewable energy policy and legal experts currently active in the Irish solar market.

We welcome DECC's activity and support to stimulate the takeup and rollout volumes of solar PV microgeneration, enabling a greater number of Irish people to engage in the energy transition.

More generally, we would encourage the DECC to accelerate microgeneration policy review in relation to agriculture, business and the industrial and commercial sector and the planning administration and approvals requirements. Without such a policy signal, these sectors may not be enabled to meaningfully participate in the rollout of solar PV and its contribution towards net zero.

VISION

ISEA has long maintained a view that at least 5GW of solar is attainable by 2030, with at least 2GW of those volumes deliverable in behind the meter settings including:

- Domestic rooftops
- Business and farms
- Public buildings and schools
- Industrial and commercial settings

ISEA objective is to work towards a significant increase in the rollout of solar PV and maintains that the incentive and support scheme for rooftop solar PV needs to be revised in order to stimulate a significant and immediate increase in demand across all sectors if we are to achieve the 250,000 government target by 2030.

In our view, that solar deployment should occur within an ecosystem whereby every Irish home and business is enabled to be full participants within the energy transition. This view entails Irish households being both sources of generation (microgeneration) and storage/flexibility (batteries, EVs) happening within an efficient home (via BER and efficiency interventions) where heat demand is met using sustainably produced sources (e.g. heat pumps). In addition, socioeconomic class should not be a determinant of a citizen's ability to participate within the energy transition. In this more integrated view, if we assume the achievement of 250,000 rooftop installations by 2030 as suggested by DECC, that would entail an average of 20,000-25,000 installations every year assuming

a linear deployment. This approximately equates to over 1,800 installations every month, every year, for the next 10 years. Based on industry data the roll out to date over the past two years equates to approximately 150 per month suggesting a significant increase in both demand and installation capacity is needed across the sectors .

In effect, we understand that the MSS is intended to stimulate this scale of annual deployment.

The consultation also rightly highlights areas important to enabling micro-generation, including planning restrictions, network management and grid capacity, which are crucial to enabling the delivery of Government policy.

The three considerations therefore informing our response are:

- **Vision:** does the MSS fully enable an integrated vision of a future home?
- **Scale:** will it stimulate the requisite scale in both public demand and installation capacity to deliver Government policy... and potentially more?
- **Barriers:** are there policy/administrative barriers within the design or external to the proposed MSS that may frustrate or conflict with the goals of the policy?

ISEA and our members have reviewed the proposed MSS and have identified five priority areas in which we would encourage revision or amendments to the high-level design (HLD):

- Simplified pricing structure:** Establish a simple pricing structure involving a Clean Export Guarantee (CEG) where more of the value of the Clean Export Premium (CEP), is reallocated upfront, perhaps in an enhanced grant amount.
- Reduced planning requirements :** easing Planning permission requirements for reasonable sized rooftop installations.
- No BER preconditions:** Open the scope property population as wide as possible to maximise the potential takeup therefore include all rated houses.
- Inclusion of new builds:** Expand the scope to include all new builds making them eligible for the MSS scheme to ensure they engage in the solar PV rollout.
- No export connection requirement:** Avoid the introduction of any connection requirement for any additional export connection and the related costs or administrative burden.

CONSULTATION QUESTION RESPONSES

Set out below (and in appendices as referenced) are ISEA's responses to the specific questions within the consultation document.

Q1. Do you agree with the approach to introduce the CEG in order to provide an export payment that reflects the fair market value of the electricity in compliance with the recast Renewable Energy Directive? If not, what alternative model would you propose and why?

We are supportive of giving effect to the Clean Export Guarantee (CEG) and believe that if properly designed it will encourage and enable a range of business models. We agree and expect that the majority of electricity generated will be for the purposes of self-consumption. Our primary concern

with the current policy as envisaged is whether it will stimulate demand beyond a narrow cohort of consumers.

Amongst our members are companies that have delivered a high proportion of the existing microgeneration connections, and have the practical experience of engaging with homeowners and landlords across domestic, agricultural, business and industrial settings. In our view, whatever model is proposed, in order to stimulate the substantial uptick in activity envisaged in Government policy it would need to meet an “acceptability threshold”.

This “acceptability threshold” will need to encourage property owners both domestic and commercial to release capital or procure debt (which may be required in many cases) and therefore the level of early-stage support needs to be sufficient to encourage them to prioritise microgeneration and provide confidence on the financial viability especially in these uncertain times.

The current policy as envisaged does not meet this “acceptability threshold” test as the likely amounts accruing to a homeowner under the proposed scheme (see text box) will be insufficient to prompt action from a customer. Especially relative to the upfront costs of the unit.

Calculating benefits of CEG & CEP

If we make the following assumptions:

- A 3kW solar PV unit (as per the Ricardo report)
- Capacity factors ranging 10-12% (based on GB practice quoted in the Ricardo report)
- 70% output retained for self-consumption as per the consultation
- CEG ranging in value of €00.04/kWh-€00.06/kWh
- CEP ranging in value of €00.06/kWh-€00.08/kWh

Across the resulting 27 scenarios, a homeowner would see on average €104 per annum

The key point is that whatever the constituent elements of the support package, it needs to enable a service provider to put in place a compelling proposition. There is a very strong view amongst our members that the policy as it currently stands will only prompt a marginal uptick in current levels of activity.

As we understand that the DECC does not intend to introduce taxation relief for microgeneration, the design options appear to be resolving around three potential elements: grant support, the CEG and the Clean Energy Premium (CEP).

There are trade offs between the different elements, if one is removed (for example grant support) it places a greater weight on the other two. If the level could be set at a threshold to meet the two tests above, we are open minded on the mechanism to achieve that goal.

Grant support

ISEA would welcome clarity from the DECC on the fate of the Solar PV grant and we maintain that the grant is an integral part of the support and incentive structure to generate the much needed stimulus to demand for solar PV in Ireland. As discussed below, without an element of grant support, the microgeneration becomes entirely dependent on the CEG and CEP. ISEA suggests that

the grant amounts may need enhancement if they are to align to government expectation of customer demand and installation rollout targets.

CEG

While the Day Ahead Market (DAM) has the benefit of being a robust and independent metric, making it a useful benchmark, we would suggest that it is also a limited one. The wholesale price reflects the costs to traders of buying electricity in the SEM for a given hour, driven by items such as wind output, international gas pricing, demand, and plants being on maintenance.

The Renewable Energy Directive 2018 (RED2) notes that the remuneration for export reflect “the market value of that electricity **and may take into account its long-term value to the grid, the environment and society.**”

The DAM is largely not driven by long-term considerations. There may be options for householders to capture some of the value in items such as grid services (DS3) and environmental pricing (carbon pricing), allowing the CEG to be set so as to better reflect the long term value of the activities of Renewable Self Consumers.

CEP

ISEA would favour a simplified pricing structure and suggests a construct centered around the CEG where the long-term value of the CEP is concentrated upfront, ideally in a grant

This would make the explanation to the public easier, avoid a complex administrative process and reduce/avoid the associated costs involved in both. We propose that the estimated value associated with the CEP for the full duration (est. 15 years) be front loaded and included in the grant structure to clear the “acceptability threshold”.

If the CEP is to be maintained, we would suggest that:

- It is concentrated in a shorter timeframe, calibrated to achieve consumer payback within five years, and
- If the goal is to maximise self-consumption and potentially minimise export, ISEA would suggest the additional structuring of the CEP to include a “generation tariff” (i.e. payment for the output from the unit, rather than export). This aligns the incentive structure with the desired behaviour (production of green power) and does not incentivise export which the HLD is concerned with limiting. In addition, it may be administratively simpler and by spreading the payment over a greater number of units of energy it would permit the DECC to set the amount payable at a lower level than might otherwise be the case.

The table below sets out the examples, drawing out these trade-offs further. We have assumed that the CEG is structured as in the consultation i.e. linked to the DAM price.

Table 1: trade-offs in different microgeneration packages

Option	Observations
1. CEG + Grant + CEP (export tariff)	To meet the tests above, assuming maintenance of the grant, the CEP does not have to be of a level in Options 3 and 4
2. CEG + Grant + CEP (generation tariff)	To meet the acceptability threshold, the CEP element can be lower than in Option 1
3. CEG + CEP (export tariff)	The CEP value is spread over 30% of the output and thus is set at a level greater than options 1 and 2

Option	Observations
4. CEG + CEP (generation tariff)	The CEP is still higher than Options 1 and 2 as there is no grant, but it is lower than Option 3
5a. CEG + grant	Recognising the value of the CEP in a grant structure is likely to be administratively the simplest and may be the cleanest route to passing the acceptability threshold
5b. CEG + CEP (concentrated)	The value of the CEP is concentrated upfront and delivered to customers so as to ensure payback within 5 years

Our membership includes experts in the field of solar PV rooftop installations and some of the leading global manufacturers of the associated equipment. With that pool of experience and expertise, we are very happy to engage around the modelling and inputs into the design of the package and would welcome the opportunity to work with the DECC to achieve the most appropriate solution.

Q2. Do you agree that initially the CEG should be a fixed, minimum tariff provided by Suppliers as a pass through cost based on the annual average Day Ahead Market (DAM) wholesale electricity price? If not, what alternative model would you propose and why?

Please see response to Question 1

Q3. A common 3.75% discount rate across all sectors assessed was chosen as an input to the viability gap assessment. Do the respondents agree with this approach? If not, what alternative would you propose and why?

A 3.75% discount rate is not appropriate. Leaving aside the methodological concerns about applying a single discount rate across different technologies, the proposed number is out of kilter with market norms. Please see supporting analysis prepared by KPMG which shows that the rate, and that even the range within the Ricardo report potentially underestimates the required return. A number of market participants with whom we engaged stated that Irish microgeneration could attract a discount rate more akin to 7% and maybe higher, especially in the early days of the sector scaling up.

Q4. The emerging policy includes a measure whereby all Renewables Self-Consumers who install micro-generation technology after 30th June 2020 can access a payment of a fixed, minimum Clean Export Premium tariff for exported electricity determined by the lowest cost technology for each sector. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

Please see response to Question 1

Q5. The proposed Clean Export Premium tariff for exported electricity will be offered for a maximum duration of 15 years for all technologies. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

Please see response to Question 1

Q6. The high-level design includes a measure whereby a Clean Export Premium tariff for exported electricity will be capped by exported volume related to the installation size in order to prevent over-remuneration. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

ISEA supports the emphasis placed upon self-consumption within the consultation paper. Customers should primarily be generating power for their own use.

ISEA is proposing that the CEP structure is amended to simplify the pricing structure and that the associated CEP value is allocated upfront alongside the grant. We also suggest that a rigid 30% limitation may not be feasible nor required and that an export threshold could be very challenging to manage in real time. The installation site will export the non consumed electricity and the smart metering infrastructure (if in place) would only track the volume exported and not operate to prevent electricity from being exported. This suggests that the MSS would require monitoring and enforcement architecture, the costs of which would likely outweigh the value of the exported electricity.

The volume of export is also likely to be related to two other factors: economics and the presence of onsite storage. Given that all the inputs into the customer bill mean that it is likely to be greater than the value of any tariff, the only volumes available for export should be what the customer cannot use. If the option exists to store that excess and use to defer demand at other times (e.g. at night when there is no solar output), there could be no export at all.

Given the costs at a household level, ISEA would strongly encourage DECC to consider an approach whereby an additional incentive- potentially under the CEP- is applied for those seeking to include a battery storage system in conjunction with the microgeneration assets (see responses to Questions 7 and 8).

Q7. The high level design proposed 4 eligible renewable technologies listed above. Do the respondents agree with this proposal? If not, what alternative would you propose and why?

The preliminary assessment accompanying the consultation underlines the suitability of each technology taking into account a comprehensive range of factors and local conditions, like:

- Various sectors (from domestic to public buildings) and their energy demands
- Grid connection constraints
- Installation and O&M requirements
- CAPEX/OPEX analysis and price forecasts

We agree that all four technologies can provide great benefits in achieving our final goals and targets, nevertheless we would like to highlight the necessity of considering the battery energy storage technology. A brief summary of its main benefits includes:

- Maximise consumption for domestic or business applications (the energy generation can be injected into the batteries during low consumption – i.e mid-day for domestic sector, during weekends for business units, summer or weekends for public buildings).
- Increased reliability of the power supply - power outages can last from a brief flicker of interruption to many days down. Having a domestic or business battery energy storage system, enhances the opportunity for a scalable backup power

- Peak Shaving - During times of high energy consumption when peak demand is likely to occur, part of the electrical energy needed within the facility is drawn from batteries, effectively reducing the amount of power taken from the grid and reducing peak demand

Furthermore, we would like to underline the following trends within the Energy Storage System ESS industry:

- As technology evolves, cost of batteries are forecast to continue dropping making this solution more attractive
- Longer battery lifetime expectancy
- Increased product safety (new stringent safety standards are developed)
- Hybrid inverters with new features like: Online monitoring to enhance energy management / Remote firmware updates and customisable settings / Easy commissioning via smart mobile applications

Q8. There is a range of renewable technology that can be deployed in domestic and SME premises and can facilitate high levels of renewable electricity self-consumption. The definition of micro-generation is therefore proposed to be “micro-generation technologies including micro-solar PV, micro-hydro, micro-wind and micro-renewable CHP with a maximum electrical output of 50kW”. Do the respondents agree with this proposal? If not, what alternative would you propose and why?

Despite the fact that a Battery Energy Storage System can be designed in conjunction with various microgeneration forms - micro-solar PV, micro-hydro or micro-wind, it is understood that current technology facilitates the integration of ESS mainly with micro-solar PV. In this respect, our proposal for definition is:

Microgeneration technologies including micro-solar PV, micro-solar PV and storage, micro-hydro, micro-wind and micro-renewable CHP with a maximum electrical output of 50kW

Q9. Applicants will be required to have an export connection from the Distribution System Operator. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

ISEA would challenge the requirement for an export connection. It is a substantial step change from current practice, is likely not required in all circumstances, and may ultimately prevent rollout of microgeneration.

ISEA’s understanding is that current “micro generation” (i.e. sub 6kW single phase and sub 11kW three phase per ESB Networks definition) connection process is that applicants submit an NC6 form and upon installation of an Import/Export meter (cost of €340) can receive revenues. The consultation proposal for a universal requirement for an export connection is a step change.

As noted in the Ricardo report and validated by our members experience, the vast majority of residential microgeneration is likely to be of systems sized in the 2-3kW range. A document published by ESB Networks in July 2020¹ stated:

“5. A review of the urban network shows that up to 4 kWp export per house can be accommodated on the distribution network with little thermal capacity or voltage rise issues and limited associated reinforcement costs in most cases.

“6. A review of the rural network shows that up to 3 kWp export per house can be accommodated on the distribution network with little thermal capacity or voltage rise issues and limited associated reinforcement costs in most cases generally where the capacity of the local 15 or 33 kVA transformer is exceeded.”

The scale of the “problem” of microgeneration for ESB Networks has not been evidenced, and at a minimum there should be a response that is proportional to the issue i.e. at different scales of array, different standards apply, or if a set of microgeneration projects trigger transformer upgrades.

We would favour a more strategic approach towards accommodating microgeneration involving spatial planning for future demand rather than a fixed requirement for an export connection. If there is to be a requirement for export connections, ISEA would suggest that there should be a tightly prescribed set of circumstances in which it may be required.

ISEA’s expectation is that the likely cost of an export connection could exceed the cost of the actual microgeneration asset. In addition, the DSO struggles to provide connections for sub 500kW generation assets given current demand levels² for those connections. There is an existing cap for the DSO of 30 applications per annum for sub-500kW.

ISEA members have observed incidents where waiting times have taken over over 18 months to get a date for their export connection and where the costs ran over tens of thousands to connect a 30kW unit. The addition of cost plus uncertain and lengthy timelines will be a significant disincentive to takeup and rollout.

Q10. The CEP will be available to existing buildings only. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

ISEA maintains that the exclusion of new builds from aspects of the MSS could jeopardise the primary objective of maximising the rollout of microgeneration and severely restrict and unduly cap the potential for microgeneration. ISEA would strongly advocate for new builds be to included in MSS to ensure that the estimated 180,000 new builds between now and 2030 are all fitted with solar PV.

The consultation notes that in effect, it is cheaper to install a system when constructing a house than fitting one into an existing dwelling.

¹ https://www.esbnetworks.ie/docs/default-source/publications/assessment-of-the-scope-for-higher-penetrations-of-distributed-generation-on-the-low-voltage-distribution-network.pdf?sfvrsn=d2d501f0_0

² Under the ECP2.1 process, six projects less than 500kW are to be offered connection agreements in 2021. They are unlikely to connect for some time after that.

Recent changes to Part L of the Building Regulation to give effect to the Nearly Zero Energy Building requirement by mandating the elimination of oil and gas fired systems by 2025 has significantly shifted the focus away from the installation of solar PV microgeneration and onto the install of a renewable heat system (e.g. heat pump) for new builds.

Feedback from the industry suggests that support from direct participation in the MSS scheme is needed to ensure that solar PV is installed for new builds and thereby avoids the additional cost and time lag of generated by future microgeneration installations for many of these buildings post construction.

ISEA would contend that not permitting these buildings to capture some value from the CEP would discourage microgeneration on these buildings, when a more energy efficient dwelling may be the most climate friendly setting for microgeneration.

Q11. Occupied buildings will need to achieve a minimum post-works BER C rating. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

ISEA would like to encourage the MSS to be as inclusive and fair a support model so that all Irish properties can benefit from engaging with the microgeneration movement. To achieve our objective of the widest possible roll out of solar PV to Irish households we proposed that the BER-linked requirement be removed as an entry point into the scheme as:

- It is unfair to customer who own older or lower BER rated properties,
- It limits the applicability of the MSS, potentially frustrating the policy.

As noted above in our vision, we favour efficiency and renewable self-consumption; we want consumers to participate in the energy transition, ISEA has concerns about the Government mandating retrofits as the entry point for people to participate in the renewable energy transition and is convinced that customers will start with solar PV microgeneration and then move further to the further retrofit.

A conservative estimate for a residential retrofit would likely fall in the €20k-€30k range and we are aware of instances of much greater costs being required. This requirement would put it beyond the reach of many households without green finance or more substantial support from the Exchequer.

ISEA has reviewed the data on existing buildings with BER ratings (approximately 929.4k) and identified a range of factors which, when considered, limit the property population and make it difficult or near impossible to achieve customer uptake & installation targets (250, 000).

Restricting the property population by BER rating requirements will be unduly limiting if we are to achieve significant microgeneration from rooftop solar PV in Ireland by 2030.

Factors that limit the property population and or the take up rate include:

- Properties assessed as potentially unsuitable for Solar PV
 - (Apartments & Masionettes) (est. 179K properties)
- Properties with small roof size i.e. <30sqm.
 - (est. 10k of suitable properties)
- Properties constructed post 2011
 - (est. 64k)

- Properties with a below C BER rating
 - (est. 350k increasing to 600k for below a B BER Rating
- Properties with rooftops unsuitable for solar PV due to orientation, presence of Velux windows, or shading,
 - (est. 25% equating to)
- There may be property proprietors who are not motivated to participate such as absent owners.
- The standard sales-to-customer engagement ratio 1 in 10, i.e. how often a customer discussion turns to a system being installed

Artificial or administrative restrictions on the scope of potential properties exacerbate the challenge of getting the momentum required for solar PV takeup. ISEA would welcome the opportunity to discuss our assessment of the BER database and potential property population in more detail with the DECC.

If DECC was minded to persist with the BER, we would advise that it was only included after the scheme was running for a number of years to give the sector and building stock time to catch up with the policy.

Q12. The minimum BER rating for the MSS will be increased over time to align with other Government energy efficiency retrofit programmes. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

As stated above ISEA proposes that there the BER precondition for a property to be included in the MSS be changed. All rated properties should be included to ensure the scheme is inclusive and fair and not discriminate against property type, age, condition or exclude segments of the community that cannot afford a full deep retrofit. Also see response to Question 11.

Q13. Community groups must conform to the definition of a Renewable Energy Community and be registered with SEAI. Do the respondents agree with this approach? If not, what alternative model would you propose and why?

There is an administrative logic to aligning definitions and requirements across different programmes. The topic of community by its nature (as it involves the agglomeration of individuals and groups in ways that are challenging to define) can be challenging to draw a boundary around.

As matters stand, however, we would question the value of members of a community participating as a community rather than individually as a business or a homeowner, as there are challenges in community energy relevant policy and the definition of a Renewable Energy Community is challenging to implement.

To batch microgeneration across communities and attain the potential benefits, we would suggest the following enabling policies need action:

- Ireland's private wire legislation requires reform. Without an ability to share electricity within the community and sell peer-to-peer, communities selling electricity as envisaged under the Renewable Energy Directive cannot happen, as is currently the case with Ireland's private wire legislation.

- The definition of a Sustainable Energy Community (SEC) should be considered. There seems to be some misalignment in how SEC has been implemented as there are reported examples of communities seeking to be renewable generators being denied access to the SEC with reason given that SEC is focused upon retrofits and energy master plans. Given this scheme is to support generation, there could be scope for challenges in its implementation.

We would also ask would a legal entity be required with associated reporting requirements? If so, is there a risk that the level of bureaucracy potentially outweigh the benefits available under the MSS?

At a minimum, we would suggest policy on community participation in microgeneration probably needs a more holistic review of them as a stakeholder class, like agriculture or business. Purely defining them as RECs potentially inhibits their participation and risks losing the benefits of aggregation offered by a community of participants.

Q14. The emerging policy proposes that Suppliers recover the costs of the Premium support through the PSO. DECC welcome the respondents' views on the funding mechanism supporting micro-generation. Do you think the PSO should support micro-generation or should this be through Suppliers retail rates or other mechanism?

It is appropriate that the costs of the CEP are recovered via the PSO as it is in line with existing practice and provides transparency on scheme costs. Please see supporting analysis prepared by KPMG, favouring the use of the PSO

We would further observe that:

- Forecasting volumes in the PSO has been an issue, so we would encourage the DECC to request that CRU consider microgeneration in their work considering PSO volatility
- There should be a full life cycle review of the PSO process when implementing this policy to avoid any unintended consequences. For example, under the RESS process it was made extremely difficult to change offtaker (i.e. the supplier providing the RESS contract). While recognising suppliers need some certainty on cost recovery, a scenario where a customer was unduly limited from changing supplier due to how the PSO legislation is written could lead to uncompetitive outcomes.

Q15. DECC welcomes the respondents' views on how to manage the scheme costs and the frequency of changes in the support arrangements.

The below suggestions are grounded in the experience of a number of our members of similar schemes in other jurisdictions.

- Annual reviews do seem reasonable, however it would be helpful to set out in advance what factors should influence those reviews to help frame market expectations. For example, inverter and construction costs will directly influence the expense of PV microgeneration.
- Abrupt decreases in support levels are to be avoided. The market should be given upfront information on the support level and expected support levels over time, which would be expected to decline, incentivising efficiency on the part of service providers. Reviews and the date by which they take effect should be scheduled well in advance.
- A high initial tariff can potentially spur activity and generate momentum in a market, based on the GB experience, even with subsequent declines in pricing levels.

CONCLUSION

ISEA welcomes the development of the MSS. As noted above, there are a number of considerations that ISEA and its members believe should be factored into the detailed design of the scheme including:

1. Ensuring that planning permissions requirements and administration is simplified and streamlined for both domestic and commercial properties
2. That the scope of properties to be included in the scheme is maximised by removing the BER requirement
3. Ensuring that the scheme includes incentives so that going forward all new builds are encouraged to install Solar PV
4. Establish an easy to understand, simple to administer market based CEG pricing structure
5. Incorporate the proposed CEP amounts in the upfront loaded grant incentive
6. Eliminate the requirement for export connections

We are strongly supportive of DECC giving effect to the Clean Export Guarantee. We would welcome the opportunity to engage in more detail around our response and the design of this important policy.

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