

## **SUBMISSION TO COMMISSIONER MIGUEL ARIAS CANETE 29<sup>th</sup> MAY 2019**

The Irish Solar Energy Association (ISEA) was founded in May 2013 and is the solar industry representative body for the island of Ireland. With over 70 members, ISEA is committed to highlighting the potential for solar energy's contribution to Ireland's economic and environmental future. ISEA is committed to contributing to the development of viable renewable energy policies that support the development of solar in Ireland via research, consultation, conferences and other fora that bring key stakeholders together to shape policy.

ISEA believe that a solar industry in Ireland can deliver over 5GW of capacity between 2019 and 2030 and potentially a great deal more. At this scale, and with a 20-year CFD, there would be a net saving to the consumer. That capacity quantum could supply the demand equivalent of over 1.2m households. Helping in a significant way towards meeting our 2030 targets. Solar creates more local employment than any other form of renewables and could deliver over 9,200 jobs between now and 2030. The net contribution to the economy of 5GW between now and 2030 would exceed over €6.5bn.

From a technical perspective, the complementary generation profile of solar PV and wind in Ireland, means solar PV can increase the penetration of renewable electricity without requiring significant new grid infrastructure. Solar could have c2GW of generation available to bid for the first RESS auction. Currently c1,190MW of solar PV projects have planning consent and 922MW are within the planning system. 2,631MW of solar PV project have either signed connection agreements or are live and processing with the System Operators.

In terms of citizen empowerment and fuel poverty with the correct support in terms of a suitable Feed-in-Tariff for roof-top solar, this would help alleviate fuel poverty. In addition, solar offers a real opportunity for community involvement and engagement in a positive manner with renewable energy.

Ireland shall not meet the EU wide increase in 2030 targets to 32.5% unless there is a radical change in current policy. ISEA very much welcomes the recently announced government ambition to deliver over 70% renewables on the system by 2030. This is a material increase from the original 55% ambition and shows clear signal. Delivering this quantum of renewable generation will require a marked change in policy and direction from successive governments. The main mechanism for deploying this capacity will be the Renewable Energy Support Scheme or RESS. We have yet to see the detailed design of this auction scheme and to-date no submission has been made to DG Competition for State Aid Approval.

There is a considerable emphasis on off-shore wind in recent policy documents and the NECP. While we believe that off-shore wind will make a material contribution to the overall quantum of renewables in Ireland, ISEA is concerned that the government has failed to appreciate the potential contribution from solar in meeting the States renewable energy targets. ISEA welcome the RESS consultation document and Ireland's NECP, however there remain several key barriers to deploying low cost solar in Ireland:

- **Biomass** for electricity generation only, should not gain additional policy support. Biomass as Combined Heat and Power (CHP) should benefit from support. Biomass and co-firing of biomass qualifies to participate in the future RESS auctions.
- The practice of **peat burning** for electricity generation should not be supported by policy. There are currently three peat fired power stations benefitting from the Public Service Obligation (PSO) support. They meet 7% of the demand but account for over 22% of the emissions from the sector.
- In addition to auctions for large scale solar, ISEA is calling for **Feed-in-Tariffs for roof-top, commercial and Domestic solar**. The combination of these sectors could see 5GW of solar generation capacity deployed by 2030. Roof-top solar of less than 1MW does not require EU State Aid approval. ISEA calls for an appropriate FIT for solar in Ireland.
- Roof-top solar of less than 500kW should be **exempt from requiring planning** permission. Roof-top solar over 3.5kw currently requires full planning permission. The requirement for planning permission causes delay and increase costs.
- ISEA call for the standardisation of **development contributions** and local authority **rates** for all renewables. These costs currently vary from county to county and are a barrier to deployment.
- There is a growing demand for renewable energy from large energy consumers in the Irish economy. **Private wire across third party land** should be permitted to enable generators supply large consumers directly behind the meter. Under current legislation this is currently prevented.
- **Community Benefit** payments from renewable generators should be invested in deploying roof-top solar on local schools and community buildings.
- **Community Investment** is welcomed but should be based on a regulated crowdfund platform and the investment should be underwritten by, and liquidity initially provided by a division of the State sovereign wealth fund or ISIF.
- There should be a review of the **grid connection process** with a view to making this more efficient. The time taken to process grid interconnection processes and deliver the renewable infrastructure is a barrier to the timely deployment of renewables.
- ISEA call for a full **review of grid connections costs** on the distribution and transmissions network as they are the highest in Europe. This is perhaps the largest barrier to the efficient deployment of renewables in Ireland and will lead to an increase in the LCOE of wind and solar in Ireland.