

Access and Compensation Workshop - Airtricity Response

Access

Q: Do you agree that the principles applied to customer request design variations (as represented in the current arrangements or in the CUSC amendment CAP149) should extend to offshore connections which, whilst compliant with the offshore standards in the SQSS, do not have the same levels of circuit redundancy as compliant onshore connections?

Where customer request design variations result in either increased or decreased costs being incurred, then the customer should see those costs being reflected back in the charges levied upon them. The exact level, and mechanism to achieve this, requires further consideration and will be dependent on the methodology chosen.

Q: Currently, if a restricted capacity had to be shared between parties, entitlements would be set by pro-rating the different parties' capacities. Are more sophisticated arrangements required at this stage for offshore networks or is sufficient flexibility delivered through pro-rating and short term access products?

Given the nature of offshore transmission currently envisaged, it is questionable whether offshore users will have the same ability to access short term access products as on-shore users. Care should be exercised and further consideration given, before making this assumption and basing policy upon it.

Since offshore transmission will be primarily connecting [variable] renewable generation, in the foreseeable future, the use of simple "pro-rating" may not achieve the optimum outcome. There will need to be an efficient mechanism for secondary reallocation of available capacity, if this is pursued on the simple basis above. The opportunity should be taken to examine more streamlined and flexible arrangements suited to the offshore situation, rather than simply relying on "existing short term access products"

Compensation

Q: Should Offshore Transmission users be compensated for a loss of access due to a problem on the onshore component of the transmission system on the same basis as onshore users?

Yes – there is no difference in circumstances; offshore users should be compensated on the same basis.

Q: Do you agree that the most appropriate source for compensation to offshore users in the event of an offshore access restriction is the Offshore Transmission Owner under an OFTO Incentive framework?

This requires more detailed definition. The OFTO may be required to restrict access to its network due to events of conditions which do not originate on its own network. In these circumstances it should not be held liable, and generators should be fully compensated for any loss of access.

Should 'CAP048' style compensation payments only be available to offshore users who have a connection standard equivalent to the minimum standard specified in the SQSS for onshore users?

No – where a non FULLY redundant connection is made to the offshore generator [e.g. 3 by 34% rated circuits – which provide a small (2%) level of redundancy, the loss of one circuit will still allow a significant proportion of the offshore user's output to be transmitted. In this case, the user would be entitled to expect a connection which was 66% "firm" [and compensation based upon this]. Similarly for two 50% rated cables, the level of firmness would be 50%.

Should any 'CAP048' compensation cover the onshore component of charges as well as the offshore component?

Yes –for the reasons given above.