Findhorn Wind Park Ltd.

The Park, Findhorn, Forres, Moray, IV36 3TZ, Scotland.

Tel: (01309) 692388

25th August 2021

Access and Forward-looking Charges Significant Code Review:
Consultation on Minded to Positions

To whom it may concern,

Findhorn Wind Park (FWP) is a 675kW wind farm with the Findhorn ecovillage community connected on the same GSP. The ecovillage consists of a mix of commercial and residential properties owned by charities, private individuals and businesses. We generate about the same amount of power as the ecovillage uses, approximately 50% of production being direct self supply.

We make responses only to some questions as follows:

Connection boundary

Question 3a: Do you agree with our proposals to remove the contribution to reinforcement for demand connections and reduce it for generation? Do you think there are any arguments for going further for generation under the current DUoS arrangements? Please explain why.

In the case of FWP, the connection charges have already been paid. However in general we believe this will be helpful to other similar projects.

Question 3b: What evidence do you have on the effectiveness of the current connection charging arrangements in being able to send a signal to users and what do you think will be the effect of our proposed changes? How does this vary between demand and generation connections?

FWP has spare export capacity, however any change to our installed capacity requires a full G99 ENA application. Even for the addition of a domestic PV system on a private house, this results in automatic cost of offer expenses of £370 and witness testing charges of £300.

This has effectively blocked further renewables investment on the site and means we are unable to better utilise capacity for which we have already paid. If our GSP were moved along the busbars, none of these barriers would apply and domestic scale PV would be added to the grid under G98. We would however, be unable to make our self supply.

Question 3c: What are your views on the effectiveness of the current arrangements in facilitating the efficient development and investment in distribution networks? How might this change under our proposals where network companies are required to fund more of this work?

We have a private grid and experience problems in developing this as described in 3b. In relation to the regional DNOs we make no comment.

Access rights

Question 4b: Do you agree with our proposal to introduce new time-profiled access choices at distribution? Do you have any comments on their proposed design?

Yes, we support this proposal,

TNUoS charges for SDG

Question 5a: Do you have any evidence that SDG does not contribute to flows in the same way as large generation and, therefore, should not be charged on a consistent basis?

As an SDG using ~50% of generated power for self supply this is clearly the case. We would be penalised by the proposal whilst demonstrating a highly efficient model of local generation and use.

If we had transmission costs imposed we would pay DUoS and TNUoS whilst transmission connected generators would only pay TNUoS.

Question 5c: Do you have any evidence that distribution connected generation at a grid supply point has a different impact than directly connected generation?

See response to 5a.

Question 5e: Do you support our position that we should consider transitional arrangements? If so, do you have a preferred option and evidence to support the benefits or risks associated with each option?

Grandfathering rights as an existing generator would be very important to protect our ongoing viability. We are a ROC site and will cease to receive ROCs in 2027. Stable charges will support the strategic investment we need to make before this. Early news on the fixed price certificates that may replace ROCs is also important in informing investment.

Best regards,
Duncan Easter.

Project Manager
Findhorn Wind Park Ltd