



An Coimisiún
um Rialáil Fónas
**Commission for
Regulation of Utilities**

INFORMATION NOTE (CRU/2025123)

ELECTRICITY CONNECTION POLICY – GENERATION AND SYSTEM SERVICES (ECP-GSS) - UPDATE ON THE REQUIREMENT FOR GRID APPLICATIONS FOR THE 30 SEPTEMBER 2025 BATCH

The Commission for Regulation of Utilities (CRU) has today, 25 August 2025, published this Information Note to provide an update in relation to the planning application acknowledgement of completeness as referenced in the CRU's *Electricity Connection Policy – Generation and System Services* (ECP-GSS) Decision Paper (CRU/2024101) and the subsequent *Electricity Connection Policy – Generation & System Services: Pre-engagement and High-level Technical Assessment* Decision Paper (CRU/202584).

Summary

The CRU has decided that any of the following may be provided by “RED III project”¹ applicants with their Grid Application to the relevant System Operator (SO) by way of demonstration of the prior submission of a planning application, for entry into the September 2025 ECP-GSS Batch:

- i) Letter from the relevant Planning Authority acknowledging the completeness of an application under S.I. 274 of 2025, if received by the applicant prior to the grid batch closing date, or

¹ As per CRU/2024101, a “RED III project” is a project covered by Article 16 of the Renewable Energy Directive III (RED III), i.e. renewable projects and co-located energy storage projects. Under the definition in RED III, “co-located energy storage” means an energy storage facility combined with a facility producing renewable energy and connected to the same grid access point. “Non-RED III projects” are those which are not covered by RED III, i.e. conventional projects, energy storage projects which are not co-located as per the RED III definition, or other system services technology projects.

- ii) In respect of an application made directly to the Local Planning Authority, a copy of any letter issued by the Local Authority in respect of the proposed development pursuant to Article 26(2) of the Planning and Development Regulations, 2001-2025, or
- iii) In respect of any application made directly to An Coimisiún Pleanála, a copy of any correspondence issued by An Coimisiún Pleanála confirming the receipt of an application made for the proposed development under Section 37E or Section 182A of the Planning and Development Act, 2000 (as amended).

In addition, the requirement for the Grid Application to be submitted not greater than 15 calendar days following its Planning Application being acknowledged as complete by the relevant planning authority is removed for all applicants into the September 2025 batch, regardless of whether their Grid Application contains either the planning application acknowledgement of completeness or the letter / correspondence detailed above.

Further information is provided below.

Background

Article 16 of the Renewable Energy Directive (RED III) specifies that within 45 days of receipt of an application for a permit, the competent authority shall acknowledge the completeness of the application. The ECP-GSS Decision Paper (CRU/2024101) subsequently decided, following engagement with the Department of Climate, Energy and the Environment (DCEE) and the System Operators (SOs), that a RED III project's Planning Application must first be acknowledged as complete by the relevant planning authority before a Grid Application, along with evidence of the acknowledgement of completeness, can be submitted to the relevant SO.

CRU/2024101 detailed that the CRU considered that allowing projects to apply for their grid connection following the acknowledgement of a complete planning application by the relevant planning authority could help expediate the overall RED III permitting process and meet the timelines specified in Article 16 of RED III.

The subsequent *Electricity Connection Policy – Generation and System Services: Pre-engagement and High-level Technical Assessment* Decision Paper (CRU/202584) also specified that evidence of the acknowledgement of completeness must be provided with the Grid Application to the relevant SO. CRU/202584 noted that the CRU was cognisant of the need for further clarity with regard to the acknowledgement of completeness of a planning application and was engaging with DCEE, the Department of Housing, Local Government and Heritage (DHLGH), and the planning authorities to ensure greater alignment between the grid- and planning-permitting processes.

The CRU notes that new planning regulations (S.I. 274 of 2025) were recently published. These regulations specify the process for the planning authorities to issue acknowledgements of completeness. However, in the absence of these regulations being published sufficiently ahead of the September 2025 deadline, the CRU is cognisant of the need for this Information Note to provide clarity on the grid-application process for projects wishing to apply into the ECP-GSS batch closing 30 September 2025, and also on the need for an update as to the ECP-GSS process post-September 2025.

Grid-application process for 30 September 2025 Batch Closing Deadline

The CRU has decided that any of the following may be provided by “RED III project” applicants with their Grid Application to the relevant SO for entry into the September 2025 ECP-GSS Batch:

- i) Letter from the relevant planning authority acknowledging the completeness of an application under S.I. 274 of 2025, if issued by the

planning authority and received by the applicant prior to the Batch Closing Date, or

- ii) In respect of an application made directly to the local Planning Authority, a copy of any letter issued by the Local Authority in respect of the proposed development pursuant to Article 26(2) of the Planning and Development Regulations, 2001-2025, or
- iii) In respect of any application made directly to An Coimisiún Pleanála, a copy of any correspondence issued by An Coimisiún Pleanála confirming the receipt of an application made for the proposed development under Section 37E or Section 182A of the Planning and Development Act, 2000 (as amended).

Furthermore, the requirement under CRU/2024101 (and reiterated in CRU/202558) for the Grid Application to be submitted not greater than 15 calendar days following its Planning Application being acknowledged as complete by the relevant planning authority in order for them to be included in the overall RED III timelines is removed for all applicants into the September 2025 batch, regardless of whether their Grid Application contains either the planning application acknowledgement of completeness or the letter / correspondence detailed above.

The CRU emphasises that the above acknowledgment / letter / correspondence does not guarantee that planning consents will be granted. As noted in CRU/2024101, there is a level of financial risk to a project insofar as planning permission might not be granted. In order to mitigate this risk a project may make the decision to submit their Grid Application



An Coimisiún
um Rialáil Fónas
**Commission for
Regulation of Utilities**

only once planning consents are received. In this case, the “overall” permitting timeframes in RED III will not apply (as per CRU/2024101)².

Whilst the letter or correspondence under ii) and iii), respectively, might be issued from the relevant planning authority which will allow applicants to apply to the SOs for their Grid Application into the September 2025 batch, the CRU understands that, under certain circumstances, the planning authorities may subsequently invalidate the application which is the subject of the letter or correspondence. In such instances, the CRU understands that the applicant will be informed by the planning authority. In such instances, the applicant must inform the relevant SO of this as a matter of urgency and before the end of the Batch Formation Process at the very latest (i.e. 45 calendar days following the 30 September 2025 Batch Closing Deadline). Such projects will not be included into the September 2025 batch and will need to reapply into a subsequent batch under the rules for that batch. In such instances, any grid application fees paid will be refunded by the SO to the applicant (except for the Pre-application Notification deposit (see CRU/202584) which will not be refunded). The intention of this is to reduce the workload of the relevant SO, so that SO resources are not used for the processing of applications for which it will be unable for the applicant to accept their connection offer due to lack of planning consents. Please note, that this will only apply for the September 2025 batch.

Please also note that, as per CRU/2024101, “non-RED III projects” are required to have received planning permission being granted before a Grid Application can be submitted

² In such instances, the “overall” RED III permitting timelines will not apply (e.g. not exceeding two years under Article 16b). In such instances, the project will not be classed as a “non-RED III project” because, under the definition in CRU/2024101, “non-RED III” projects would be conventional projects, energy storage projects which are not co-located as per the RED III definition, or other system services technology projects. Please note that in such instances, the grid permitting timelines set out in CRU/2024101 will continue to apply (i.e., a maximum of 12-months from the Batch Closing Deadline for issuance of the Connection Offer).

to the SO. Therefore, the above requirements to submit the planning application acknowledgement of completeness or the letter / correspondence detailed above do not apply to such projects.

In summary, Grid Applications for RED III projects to the September 2025 batch must contain evidence of either the above detailed letter / correspondence, or evidence of planning application acknowledgement of completeness.

The CRU emphasises that the above will not affect grid connection offer processing timelines as set out for the SOs in CRU/2024101.

Grid-application process post-September 2025

For the March 2026 batch onwards, the requirements set out in CRU/2024101 will apply (i.e. evidence of the acknowledgement of completeness of the planning application must be provided with the Grid Application). As detailed above, new planning regulations (S.I. 274 of 2025) have been published which specify the process by which the planning authorities will issue this acknowledgement of completeness.

However, there potentially could be instances where projects have already received a letter / correspondence as detailed in ii) and iii), above, in lieu of planning application acknowledgement of completeness, but whereby the project does not submit their grid application into the September 2025 batch. Therefore, for projects applying into the March 2026 batch onwards, any of the following may be provided by “RED III project” applicants with their Grid Application to the relevant SO for entry into the batch:

- a. Letter from the relevant planning authority acknowledging the completeness of an application under S.I. 274 of 2025, or
- b. In respect of an application made directly to the local Planning Authority, a copy of any letter issued by the Local Authority in respect of the proposed development



An Coimisiún
um Rialáil Fóntas
**Commission for
Regulation of Utilities**

pursuant to Article 26(2) of the Planning and Development Regulations, 2001-2025 **dated prior to the 30 September 2025 Batch Closing Deadline**, or

- c. In respect of any application made directly to An Coimisiún Pleanála, a copy of any correspondence issued by An Coimisiún Pleanála confirming the receipt of an application made for the proposed development under Section 37E or Section 182A of the Planning and Development Act, 2000 (as amended) **dated prior to the 30 September 2025 Batch Closing Deadline**.

Furthermore, if it arises that there are implementation issues for the planning authorities in respect of the issuance of planning application acknowledgements of completeness as per S.I. 274 of 2025, then letters / correspondence as per ii) or iii) (in the previous section of this Information Note) will be accepted for applications by RED III projects into the March 2026 batch.

For applicants into batches post-September 2025 which receive a planning acknowledgement of completeness from the relevant planning authority, the Grid Application must be submitted not greater than 15 calendar days following a project's Planning Application being acknowledged as complete by the relevant planning authority for the "overall" RED III permit-granting timelines to apply, as per CRU/2024101.

A further update or Information Note may be issued in the future in relation to individual batches, if required.

The CRU is also continuing to engage with stakeholders including the SOs, DCEE, and industry in relation to the Pre-engagement process and the provision of a HLTA for the enduring process. Further updates will be provided on this, and in relation to the Charging and Rebating Methodology (see CRU/202538) in due course.