

September 24, 2010

**Re: Coastal and Marine Union's Comments on Pilot Framework Guidelines on Electricity Grid Connection**

The Coastal and Marine Union (EUCC) is an association with 2700 members and member organisations in 40 countries. Founded in 1989 with the aim of promoting coastal conservation by bridging the gap between scientists, environmentalists, site managers, planners and policy makers, it has grown into the largest network of coastal practitioners and experts in Europe, with fifteen national branches and offices in seven countries. EUCC is dedicated to conserving and maintaining healthy seas and attractive coasts; and advocates best practice by developing coastal and marine policies, mobilising experts and stakeholders, providing advice and information, and implementing demonstration projects.

EUCC is active with climate adaptation and mitigation for Europe's coast and marine areas, including marine renewable energy and related electricity grid infrastructure for coasts and marine areas. EUCC is also involved in EU level projects such as the SEAENERGY 2020 (Delivering Offshore Electricity to the EU: Spatial planning for offshore renewable energies and electricity grid infrastructures in an integrated EU Maritime Policy). This submission focuses on the Grid Connection Framework Guideline with respect to marine renewable energy and related grid infrastructure requirements, and the developing European regulatory framework.

The Framework Guideline focuses on intermittent generation, distributed generation and responsive generation as requiring specific grid connection guidelines. The guideline contains references to existing and incremental users, particularly intermittent generation that may have greater system requirements and impacts. There is also a discussion of the relationship between European, regional and national regulation, and the interfaces between these European, regional and national regulatory regimes.

Significant marine renewable energy is being developed, or being proposed, that will be required to meet European renewable energy and carbon reduction requirements, as well as providing local, regional and continental energy security. Marine renewable energy is likely also to be at the forefront of assisting with adaptation and mitigation to climate change for coastal and marine regions. Given its location, European directives, policies and funding could have a dominant role in the development and regulation of this energy and grid infrastructure. It appears that extensive marine renewable energy development and grid infrastructure may first occur in the North Sea region. Fostering this marine renewable energy will require significant private and public investment in an electricity grid infrastructure, and an open transparent and easily understandable regulatory framework that addresses economic, societal and environmental impacts of these developments and grid infrastructure.

Therefore, it could be useful to consider offshore marine renewable energy and related electric grid infrastructure and connection requirements as a separate category of grid connection and grid users. More generally, it might be useful to consider marine renewable energy and grid infrastructure in coasts, and those marine areas outside national jurisdiction, as a distinct area and field of European regulation, where European and perhaps regional regulators and policy may have unique and distinct roles. EUCC welcomes to the ongoing opportunity to participate further in the development of this regulation and policy.

Yours truly

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