

Comments on URCA's Draft Annual Plan 2024

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URCA having released its Draft Annual Plan 2024 and requesting comments on its document, I submit below my considerations for URCA's contemplation. I wish URCA the best success in 2024.

Website Redevelopment

I applaud URCA's desire in redeveloping its website. I hope a future version of the website makes it easier to find all application forms that can be submitted to URCA, groups like content together (ie. everything electricity sector related, or consumer protection related) and separates and features relevant decisions or determinations from consultations. Perhaps expired consultations can exist in an archive section properly noted as expired.

List of 2024 Electricity Sector Projects

Table 3.4 list 11 ES projects that URCA wants to complete by 2024's end. I am concerned that the number of projects for the calendar year might cause the individual works to be of less quality due to the time requirement, especially given almost 30% of the projects were carried over. Additionally, it would be helpful to know the priority of the projects. Which projects are more important than others? This would increase transparency of URCA's success in 2024.

Key Performance Indicators of 2024

It would be appreciated if the tables in Section 4 had a column for units to better understand the scale of which URCA measures itself and to increase clarity (especially Table 4.5). This would help to set up the comparison of KPIs in URCA's Annual Report, which URCA can use to benchmark itself to previous years and discuss that performance.

The Analysis of Renewable Energy Cost and Performance Data for Existing Projects

I encourage URCA to publish the relevant data from this analysis as it may be of interest to government and private sector (business and consumer) to encourage growth in RE. It would be nice to see figures for Capital, Fixed and Variable O&M costs, availability and capacity factors, and estimated operational lifetimes, historical and current.

The Revision (consolidation and updating) of Renewable Energy Frameworks

This would increase understanding and promote uptake by increasing the clarity which I applaud. I hope frequently asked questions and points of past confusion are incorporated into the updated frameworks.

Review and Revision of the Licensee Reporting Requirements

I wonder it is worthwhile to implement strategies to make reporting less burdensome by increasing a licensee's competencies rather than just amending the requirements. Notwithstanding that, licensees should report on how much CO2 and other pollutants they emit, if they are not already doing so, if we are to assess the sustainability of electricity in-country.