



14<sup>th</sup> May 2019

Ms Amber Raut  
The Commission for Energy Regulation  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

### **Western Development Commission (WDC) Response to the CRU Consultation on the Draft EirGrid Transmission Development Plan 2018-2027 CRU 19048**

Dear Ms Raut,

The Western Development Commission<sup>1</sup> (WDC) welcomes this opportunity to make a short response to the above consultation.

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region<sup>2</sup>. The WDC seeks to ensure that government policy and its implementation reflects the needs of the Region across such areas as infrastructure, natural resources, industrial and rural development. The WDC regards the provision of a quality electricity transmission and distribution networks as important elements of the infrastructure required to underpin the economic development of the region, both to supply homes, businesses and other activities and in terms of the opportunities for renewable electricity generation in a region with significant natural resources..

There has been substantial progress in the development of renewable generation in the Western Region. It is estimated that by 2020 over 100% of electricity demand in the Western Region will be met from renewable generation in the Region. The Region will be providing approximately 15% of the total national electricity demand from renewable generation and therefore making a significant contribution to the 2020 40% RES-E targets. By 2020 there could be approximately 1,760MW of renewable generation connected in the WDC region, 1,595MW of wind generation and 165MW of hydro generation. There is a further 1,000MW of renewable generation in the WDC region that will have contracted or been offered connections by mid-2019.

The transmission system has been an important enabler to allow the region to achieve relatively high levels of renewable generation. EirGrid and ESB Networks have to-date made substantial investment in the

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<sup>1</sup> For more information about the organisation see [www.wdc.ie](http://www.wdc.ie)

<sup>2</sup> Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

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transmission network in the region. The majority of the recent investment was in upgrading the existing transmission network to provide additional capacity.

There is capacity in the transmission system for further renewable generation in areas of the Western Region including large parts of Co. Roscommon, Co. Clare and Co. Galway. As well as onshore wind, there is also the potential in these areas for the development of new renewable technologies such as solar and marine generation.

We are, however, concerned at the pace and scale of development of new transmission circuits elsewhere in the region. The areas of particular concern in the medium term are Co. Donegal and North Mayo/West Sligo. In the longer term there could also be the need for new transmission circuits to Co. Sligo/Leitrim. Considering the long timelines to deliver new transmission infrastructure it is important to take a long-term view on the generation needs in these areas.

These issues are discussed in more detail in the next section with reference to the TDP projects. We also make comments on the structure and content of the TDP as requested by the CRU consultation document.

## 1. TDP 2018 Planned Network Developments and Regional Perspectives

The TDP considers projects at a regional level, and as the BMW region is most closely aligned with the WDC region, this is the focus of the comments in this section, we do not comment on all of the projects listed.

Given the importance of electricity transmission, in 2018 the WDC commissioned MullanGrid to review the current and future needs for electricity transmission infrastructure in the Western Region, and to consider how renewable electricity generation, potential new generation technologies, new ways of using and managing electricity, and new methods of improving the use of existing transmission infrastructure might impact on need for investment. This analysis is used when commenting on projects in the TDP.<sup>3</sup>

### Reinforcement of the Transmission Network in the North West

#### *The North West Project CPO 800*

There is very little information in the TDP on this. The ECD is 2027 which is the latest completion date given for a project in this TDP. It does not seem to be getting the priority required.

The existing transmission system in Co. Donegal has the capacity to accommodate approximately 390MW to 570MW of renewable generation without the need to constrain the output of the generators. By 2022 it is expected that the connected renewable generation will increase to 604MW, exceeding the capacity of the existing transmission system. Without transmission investment, constraints of these generators could increase to moderate levels. For the past 10 years EirGrid have been considering developing new transmission circuits into Co. Donegal but there appears to be little progress in bringing the project beyond the concept stage. It is now critical that the development of new transmission infrastructure into Donegal is progressed through EirGrid's development process.

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<sup>3</sup> A summary of this work is available here: <https://www.wdc.ie/wp-content/uploads/wdc-insights-electricity-december-2018.pdf>

## **Reinforcement of the Transmission Network in the Donegal**

### *Tievebrack/Ardnagrappy 110kV Development CPO 421*

The WDC welcomes that this, the second element of the Donegal 110kV Project seems to be nearing completion. The ECD given in the Appendix is 2019 and EirGrid's website suggests it should be completed in Q2 2019. This detail should be included here, with a progress report or amended ECD. It would be helpful to have a more recent progress update rather than an ECD as it was at the time of the data freeze.

## **Reinforcement of the Transmission Network within and out of Mayo**

### *North Connacht Project 110kV Reinforcement CPO 816*

North Mayo and West Sligo has a large capacity of contracted renewable generation relative to the limited transmission network in the region. The completion of the planned North Connacht reinforcement will only at best facilitate the existing contracted generation and if the ECP-1 capacity also connects then it is very likely there will be no capacity for any new renewable generation connections. The originally planned GridWest infrastructure would have provided an 'electrical motorway' to unlock the substantial potential of North West Mayo for renewable generation.

The new North Connacht 110kV project does not provide any capacity for the development of new renewable generation in the North Mayo and West Sligo areas. Although it may be too late to reinstate the Grid West project into EirGrid's current development plans, there will be the need for further transmission investment beyond the North Connacht project to allow any new renewable generation to connect in the medium term.

Considering delays to-date on GridWest, it is now a priority that the North Connacht project is progressed and delivered in a timely manner. We would also recommend that EirGrid assess the potential renewable generation in this area with a medium to long term horizon and bring forward further transmission investment to provide capacity for the development of new renewable generation.

## **Reinforcement of the Transmission Network in Leitrim and Roscommon**

### *(CPO 834,870,942)*

With these projects EirGrid will continue with its ongoing transmission investment in upgrading and refurbishing the transmission system. However, the MullanGrid study for the WDC showed that in the longer term there are other areas of the WDC region that will need transmission investment. This would include areas in Leitrim and Roscommon or more broadly in Sligo/Leitrim/South Roscommon, South Mayo and West Galway. The TDP should be outlining high level options for these areas.

## **2. Suggestions for updates to content and structure of the TDP**

The Transmission Development Plan is an important publication which should provide clear rationale for individual project investments and clear updates on progress on projects and changes to project plans so that monitoring of infrastructure development is enabled. We would like to take this opportunity to make comments on current structure of the TDP and make suggestions for changes to content and structure of future TDPs:

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- Time period covered;
- Context and Policy References;
- Other aspects of the TDP

The TDP notes that “TDP 2018 presents our view of future transmission needs and our plan to develop the network through specific projects meet these needs over the next ten years”. As the TDP in its current form is largely project focused, we would have concerns that it is not really a development plan and does not provide enough specific information on the context for decisions (both in terms of policy and in terms of generation and demand changes) the basis for project decisions or give a view of future transmission needs (this is discussed in more detail below).

### *Time period covered*

This CRU consultation is on the Transmission Development Plan for 2018-2027. In the Plan it is never explained why this is the period covered. Given that this is 2019, and the final document will not be published until summer 2019 at the earliest, there should be some explanation of the time horizon chosen (i.e. why is it not a 2019-2028 plan?). We are aware that the data freeze was 1<sup>st</sup> January 2018, but as the TDP is largely a progress update on projects it is not clear why this data freeze is required (given that this is not a modelling exercise and projects in their early stages are not included), and if it is required why it is not 1<sup>st</sup> January 2019, or 1<sup>st</sup> March 2019? While the time period under consideration might not be considered important it does make the updates and progress with documents somewhat out of date or unclear; it is not always evident whether it is taking full account of decisions made, for example, in 2018.

### *Policy references*

In line with the discussion of time horizons above, as it is a ten year development plan rather than a progress report, it would be expected that there should be some acknowledgement of EirGrid’s long term planning work and how this might impact on developments to 2027. It is good to see a reference to ‘Tomorrow’s Energy Scenarios’ but there needs to be more clarity as to how this relates to and informs the TDP. Similarly it should be clearer how the TDP links with the Grid Implementation Plan.

The TDP refers to the national energy policy outlined in the White Paper “Ireland’s Transition to a Low Carbon Energy Future 2015 – 2030”. It notes that “Investment in the transmission system is necessary to enable Ireland’s transition to a low carbon energy future. In this regard, the TDP is developed to support government objectives and enable this energy transition”. There is no real discussion of the implications of the transition for long term grid development and it does not consider how we might begin to plan for 2030 targets or 2050 goals. There is no reference to the National Energy and Climate Action Plan, a draft of which was submitted to the EU in December 2018.

The TDP does not specifically refer to other key government policies driving change over the next 30 years, including the most significant of these: *Project Ireland 2040*. This incorporates both the *National Development Plan (NDP)* which is the capital investment programme and the *National Planning Framework (NPF)*, which will also incorporate the *Regional Spatial and Economic Strategies (RSES)*.

Ireland 2040 is the government’s high level strategic plan for shaping the future growth and development of our country to the year 2040. It is a framework to guide public and private investment. The framework estimates that there will be an additional million people living in Ireland in 2040 and it contains regional targets for population increase, and guidelines on where people should live and where employment should be focused. These long term targets should be an important part of the EirGrid planning process, and there should be some indication of how the framework and its targets for population and employment will impact on grid development in future.

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While EirGrid's planning may already be taking this into account, it is important the TDP refers to this policy context and acknowledges the objectives of the NPF in relation to population and employment as well as to future energy electricity.

### *Other aspects of the TDP*

While there has been some improvement in the structure and format of the TDP we have other suggestions to make on this. As the TDP is a ten year rolling plan, if the TDP is to be of use to readers changes in the plan from year to year should be clearly highlighted.

In each of the regional sections, background to the projects is provided but in most cases the reader is then required to turn to the appendix to find any update or changes in progress. A summary of project progress should be included alongside each project (for example the relevant row from the table in the Appendix). In the Appendix carrying over row headings from page to page would also help.

Clarity about developments, with contextual information and sufficient data underlying decisions are essential for people and organisations to gain an understanding of key investment decisions, ongoing projects and to monitor progress.

As mentioned above, as the data freeze was in January 2018 the map on page 59 shows projects at that time. It is now May 2019, it would be useful to have a more up to date map, showing progress more clearly. For example, it seems that because the North Connacht Project was not in stage 4-6 in January 2018 it is not shown on this map.

Again, as mentioned earlier, as this is ten year development plan it would be more useful if it had discussion of issues for future development of the grid and how current planning was taking account of the longer term changes ahead. It could also include, with more information, projects or areas which are in need of development, even if they are at an early stage.

We are pleased to have this opportunity to comment on the TDP. Please get in touch if you have any queries in relation to our submission.

Yours sincerely

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