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Western Development Commission (WDC) Response to the CRU Consultation on the Draft EirGrid Transmission Development Plan 2023-2032 CRU202320

Dear Ms Deegan,

The Western Development Commission¹ (WDC) welcomes this opportunity to make a short response to the above consultation on EirGrid's Draft Transmission Development Plan (TDP) 2023-2032.

The WDC is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). It operates under the aegis of the Department of Rural and Community Development.

The WDC regards the provision of quality energy infrastructure as essential to underpin the economic development of the region. Likewise, the WDC recognises the importance of the low carbon transition and is particularly concerned that the issues for our region are addressed². Our region has very significant on and offshore renewable energy resources and it is important both to the economic development of the region, and to the achievement of the national renewable energy targets, that these resources are used to best advantage.

In this brief submission we highlight a number of issues for electricity transmission in the Western Region and answer the questions posed by the CRU in the consultation document on the draft TDP.

As noted in Section 5.2 of the TDP 2023-2032 the existing transmission network in the region (most of the Western Region (the seven counties) under the WDC remit is in EirGrid's BMW region) is predominantly 110kV and 220kV with limited 400kV infrastructure in the southern part of the region. The North West in particular is relatively isolated from the 220kV network and mainly comprises long lines of 110kV grid. There is a strong wind resource and already significant wind generation in the region. This along with the lower levels of electricity demand, means that the level of generation is great than the capacity of the network resulting in local constraints.

¹ For more information about the Western Development Commission see www.wdc.ie

² <https://westerndevelopment.ie/policy/publications/making-the-transition-to-a-low-carbon-society-in-the-western-region-key-issues-for-rural-dwellers-august-2020-full-report/>



There is, and has been for a number of years, a very clear need for significant investment in the network in region. The wind resource is the best in Ireland, and it is essential to ensure that this resource, which gives rise to excellent wind farm capacity factors, is made best use of in order to efficiently achieve national climate action targets. Lack of investment in the region's network undermines the region's, and Ireland's, capacity to achieve this potential.

A very significant increase in renewable electricity will be required to achieve targets for 2030 and beyond to 2050. Given the time it takes to plan and develop the transmission network, a longer term view needs to be taken to ensure investment we make in this decade will have capacity to meet our needs in the longer term. This is especially important in the Western Region which has significant resources for renewable energy but has been left behind in terms of network development. The TDP needs to provide clear information both about projects in progress *and* areas where projects are needed and how they will be planned.

In addition to our concerns about current onshore capacity, we are disappointed that there is very little reference in the TDP to the long term potential for offshore generation and the need to begin planning for a network which will have the capacity to facilitate such development. Long term targets are very ambitious, and we would expect that by the end of this TDP period (2032) some offshore wind projects will already be in place off the West coast. This is not acknowledged in the plan, nor is the 2050 Programme for Government target of 30GW of offshore generation by 2050. Planning to achieve these targets should already have commenced. If it has, the TDP does not indicate this or provide anything other than a cursory mention that it will be required. The recent consultation paper on the OREDP 2 indicated that two of the broad areas of interest for development of offshore generation are off the Western Region coast. These areas will need significant infrastructure investment to be able to achieve the potential of our offshore energy resources.

In the North West in particular, which is already lacking in infrastructure capacity, and with the OREDP 2 Broad Area of Interest proposed off the Donegal coast, it is essential that planning for network development to meet both on and offshore needs and that development is expedited and that developers can have confidence that the essential infrastructure will be in place when it is needed.

Likewise, while the TDP notes the target of 2GW of hydrogen production it does not provide any information on the planning of the transmission network, how it might be integrated, whether on or off grid and any network which might be needed to facilitate hydrogen production and use.



4. Consultation Questions

Q1. As a result of the consultation questions last year, EirGrid have agreed to provide more detail on projects in Chapter 5 including their drivers, needs, location, estimated completion, EirGrid Capital Approval dates (GW3), Project Agreement with ESB dates (GW6), forecast energisation date (ECDEI), capital project number (CP No.) and, next step in the six-step process for developing the grid. EirGrid have also provided more information on whether the project is developer led, TSO led or DSO led. In your view, does the content and format of the document adequately provide this information? Does this paper raise any concerns around delivery capability considering the challenges ahead? Does the document outline sufficient actions to address the drivers and needs presented? If not, please highlight the specific areas where additional actions may be required.

We acknowledge improvements in this TDP (the more recent data freeze date, and the current year as the timeline for the commencement of the ten year period. We also welcome the table format summarising projects. However, in the case of larger and more strategic projects, we do not find there is sufficient detail presented on the drivers and needs or on how the projects address them. For smaller, simpler projects this information is adequate. As mentioned above, the very significant developments necessary towards the end of the TDP period are not really discussed.

Q2. In EirGrid's consultation response paper for TDP 2021 – 2030 they indicated that they were investigating ways to provide developers and other interested parties with more timely information on project delivery and expected completion dates. Has this been addressed satisfactorily in the 2023 – 2032 TDP, in your view?

While improvements in the information provided in the TDP have been made, given that the TDP is an annual publication it is probably best if the most timely information is provided elsewhere. As a Plan the focus of the TDP should be less of a progress report, providing an annual update on projects already in progress (though this is important too), and more of a planning document detailing how the constraints, challenges and opportunities of the next decades will be addressed.

Q3. The TDP currently provides general and non-project specific reasons for changes in project status e.g., from Active to On Hold or Removed. In response to the previous CRU consultation paper, stakeholders asked for more information on project status change and reasoning behind status changes. In EirGrid's response they stated they are *"happy to include more detailed reasons on project changes in future TDP reports if they are available, noting that ultimately the asset owner carries out the actual work on the system"*. Has this, in your view, been adequately addressed in the 2023 – 2032 TDP?

No, it is not adequately addressed, for example in relation to projects On Hold either no reason is given (pg 30) or examples of possible reasons are given (p35) but none are specifically related to any project and may or may not apply to any of them. For the project removed no reason is given.

Q5. Is there a clear process for the prioritisation and reprioritisation of projects in the 2023 – 2032 TDP? Do you have any suggestions in relation to this?

There does not appear to be a clear process for the prioritisation and reprioritisation of projects in the TDP.



Q6. Have network constraints identified by respondents to the consultation of the TDP 2021-2030 been adequately addressed by EirGrid in the TDP 2023 – 2032, in your view? Are there any current network constraints that are not included in the TDP and will not be resolved by the successful completion of projects set out in the TDP 2022 - 2032?

In our submission last year, we emphasised our concern that the North West Project (CP0800) had been cancelled, and removed from the PCI list, and that no project has been put in its place to address the serious issues in the northwest and in Donegal in particular. While the Donegal – Srananagh Corridor (CP1233) has been included in the TDP as a project in early stages of development there is no information about it and when it will be developed, what potential capacity improvements would arise from any new project and whether addition projects will be needed or are being considered.

In addition, while we previously welcomed the progress with the North Connacht project in the west (Mayo-Roscommon), we noted our concern that it will be at full capacity by the time it is commissioned, and that more investment will be needed in the area. We do not feel this issue has been addressed.

Furthermore, as we noted last year, a very significant increase in renewable electricity will be required to achieve targets for 2030 and beyond to 2050. Given the time it takes to plan and develop the transmission network, a longer term view needs to be taken to ensure investment we make in this decade will have capacity to meet our needs in the longer term. This is especially important in the Western Region which has significant resources for renewable energy but has been left behind in terms of network development. The TDP does not give confidence that this is changing.

Q7. As stated in Section 5.4 of the 2023 – 2032 TDP, “...there are transmission capacity constraints getting power into and around Dublin”. Does the plan clearly outline the problems and address the solutions to the constraints in the Dublin area? Should there be a dedicated chapter specifically relating to Dublin in the TDP?

If a decision is made to have a dedicated chapter specifically relating to Dublin in the TDP, then there also need to be dedicated chapters for other key areas of infrastructure constraint (e.g the north west) or chapters for projects which are addressing specific challenges (eg offshore wind, or hydrogen or interconnection needs).

Q8. The North West has, for some time, been identified as being an area where there is particular difficulty with network development (Section 3.2 of 2021 - 2030 TDP). The North West Project (CP0800) was cancelled and removed from the PCI list in 2021. There is one capital project covering The North West Project, CP1233 Donegal – Srananagh corridor. This project is reported as a Project in Early Stages in Section 6.2 and is currently under review by EirGrid’s Transmission Power System Planning area. Is this approach adequate to address this particular difficulty with network development, in your view?

No. The difficulties with the network development in the northwest have been recognised for over a decade and various planned projects have been in development and cancelled or changed since then. This approach does not give any confidence that the issue is being addressed with clear intent (unlike for example the focus on development of the network in Dublin). The remaining North West project this project (CP1233 Donegal – Srananagh) is currently under review by EirGrid’s



Transmission Power System Planning area and so there can be no confidence about the timing or the detail of the project and that it will be actually be completed. The cancellation of the North West Project (CP0800) was and its removal from the PCI list in 2021 shows that even where a project appears to be going through various development stages it may not be completed.

Long delays in the development and progression of a project to address the needs in the North West have meant that the amount of renewable generation seeking to connect in Donegal is in excess of the local demand and the capacity of the network. Despite this need, clear for many years, this TDP does not give a sense that this and other potential projects in the area are being prioritised. In addition, as noted, given that one of the proposed Broad Areas of Interest for offshore generation listed in the OREDP2 consultation is off the Donegal coast it is likely that this will also influence the scale and type of potential network solutions. This is not acknowledged in the TDP, and while the OREDP consultation was only recently published, the potential for offshore renewable generation in the North West has been clear for some time.

Links to Wider Policy

Q9. In the context of recent Climate Action policy and Security of Supply programme, does the report provide sufficient information on how projects would benefit carbon ceilings and security of supply?

We do not feel it provides sufficient information, in relation to recent Climate Action policy and Security of Supply programmes, and not just on the potential benefits for the projects in these contexts, but also on how these challenges are being addressed as part of the wider network or system planning process. While the targets are quoted, there is no detail of the strategy and steps to be taken to allow those targets to be met. We are aware that the EirGrid strategy is under going revision, but the TDP needs to provide confidence that the longer term projects, which will be in development towards the end of the TDP period, are being planned and have sufficient ambition to meet the current targets for 2030 and will have the potential to adapt to the even bigger targets for 2050.

Q10. The TDP includes projects once they have moved past stage 3 of 6, do stakeholders consider this provides sufficient information on a project lifecycle?

No. While we understand that there are many uncertainties in early stage project development and so it might not be appropriate to provide too much detail, it would be beneficial to include any projects from the initial stages defining the problem to be addressed and the potential solutions so that users can feel confident that key challenges are being addressed. This is particularly the case for larger scale projects, and issues.

Q11. Should consideration be given to improving the accessibility of the TDP, for example, would an online map assist stakeholders in accessing and engaging with the projects?

An on line map could be helpful, especially in regard to location of particular stations etc. The current static maps are not a high enough resolution to easily read their names. A map could also be useful if it could be linked to the progress reports on the projects. However, this will only be useful if this information is kept up to date.



General Questions

Q12. Are there any other aspects of EirGrid’s TDP 2021 – 2030 Consultation Report that have not been implemented to your satisfaction in the 2023 – 2032 TDP?

As we noted in our submission on TDP 2021-2030 we believe that it is still more of a progress report on projects which are already at a relatively advanced stage of development. There is no information about other network developments which may be needed by 2030, and little on what is in early stage development but will be advanced or completed by 2030.

Q13. Do you have any other suggestions to improve the TDP?

Currently, although titled a Ten Year Development Plan, the plan reads more like a progress update and there is little sense of the longer term planning which should be taking place to meet future energy challenges (e.g in relation to off shore generation off the west coast (in the context of OREDP 2) or for use of RE in hydrogen production). While these developments are in the early stages it would be expected that there will be operational projects before the end of this TDP (2032) and yet there is little reference to the process involved in meeting the infrastructure needs of such projects and timelines and stages EirGrid would envisage for the.

The TDP needs to provide confidence that such challenges (and others) are being addressed competently and in a timely fashion. This TDP does not do so, and so this is an area that could be improved.

While the end date of this TDP is 2032, the projects currently in development and those which will be developed before the end of this TDP period will be in place for the long term 2050 and beyond. There is no clear indication in this TDP that the longer term (2050 targets) are being acknowledged in the ten year planning process. It is important that they are as the lifetime of the assets in development is likely to be beyond 2060.

Conclusion

The focus of much of this consultation appears to be on the form of the TDP. Once again we would like to emphasise that given the time taken to development electricity infrastructure projects it is very important that projects which will be required towards the end of, or just beyond, this TDP period have already commenced. By 2032 there will have been very significant changes and developments (Offshore, Hydrogen, changed demand patterns) and yet this TDP does not give a clear sense of how these challenges are being addressed.

The WDC is pleased to make this submission to the consultation on EirGrid’s Draft Transmission Development Plan 2021-2030. If there are any queries concerning this submission, please contact me.

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