



Western Development Commission (WDC) Submission to EirGrid Tomorrow's Energy Scenarios consultation

12 December 2023

Introduction

The Western Development Commission (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). The WDC operates under the aegis of the Department of Rural and Community Development. We welcome the opportunity to make a brief submission on the Tomorrow's Energy Scenarios Consultation Report.

The WDC regards the provision of quality energy infrastructure as essential to underpin the economic development of the Western Region. Likewise, the WDC recognises the importance of the low carbon transition and is particularly concerned that the issues for our region are addressed¹. 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 2050 net zero targets, that these resources are used to best advantage.

In this short submission we follow the format of the questions at the end of the Consultation report. It is necessary for the WDC to have a record of submissions and it was unclear if that was possible using the online form.

Response to Consultation Questions

We are principally interested in the future of the electricity sector in Ireland rather than Northern Ireland.

Our particular concern is that electricity grid infrastructure should be in place in the west and northwest to allow for substantial growth in renewable generation, to ensure Ireland can meet its targets and to allow our region to make the most of its very significant potential for RE generation. Unfortunately, current infrastructure has not allowed for this, but it is essential that the lack of transmission infrastructure is not an impediment to development of RE generation options in the future.

¹ <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/>

Purpose of Tomorrow's Energy Scenarios

It is clear why EirGrid and SONI employ scenario planning and the scenario development process was well explained. However, the mechanism for moving from scenario planning to grid investment and development decision making is unclear.

The four scenarios chosen represent four potential future options. However, clearly some of the four are better than others at achieving the 2050 net zero target (i.e. it is achieved faster, or actually goes beyond the target (Offshore Opportunity (OO) and Self Sustaining (SS)). While we understand that EirGrid is not involved in policy making or selecting which of these scenarios are most likely, we would also be concerned that grid development should not impede the potential to achieve the more ambitious scenarios (OO in particular). If, following the development of the scenarios, EirGrid focuses on the common threads across the scenarios for planning, the risk is that it may not provide the infrastructure to allow the full achievement of some of the scenarios, even other conditions were in place.

The expectation appears to be that the 2050 outcome is likely to be a combination of all the scenarios, but the method of planning for scenario variations and the way grid development planning responds to any of the four scenario options or if it ultimately is dependent on a single model is unclear.

We understand that the system needs assessment is the next step, but there are some crucial differences in grid needs among the four scenarios, in particular in relation to grid development for offshore wind off the west and northwest coasts. We discuss this below, but it would be helpful if the scenario consultation report were clearer about what decisions will be made following the agreement of scenarios and how any investment decisions will be made, and where priorities lie.

Scenario framework

We think that the four scenarios selected do cover a range of credible futures for Ireland's electricity sector. As noted above, our main concern is about how the scenarios are translated into grid development plans. While we agree 2035-2050 is the appropriate period of study for TES 2023. Our wider concern relates to the development plans for the period to 2035. As we have noted in our many submissions to EirGrid and the CRU, the grid in the west and northwest is underdeveloped. When system modelling for grid development commences in 2035 using the scenarios, it will start with an under developed baseline in the west and north west and this in turn will impact the development model and may skew further grid development away from our region despite the very significant potential RE resource and need for significant grid development.

Electricity generation

While we feel that the four different scenarios cover four distinct, credible futures for electricity generation to 2050, as noted above we have concerns that the existing weak electricity grid in the west and northwest is already undermining opportunities for both onshore and offshore wind generation in the Western Region. This is limiting current development options and is also narrowing future development options for both on and offshore generation. Indeed, this is noted in the Consultation Report (although it fails to mention the northwest where electricity transmission infrastructure is particularly weak):

“It is important to note that spare transmission capacity on the existing transmission system is very limited, and developments of large scale offshore wind on the South and West coasts could require an unprecedented upgrade to the transmission system, far beyond what has been set out in Shaping Our

Electricity Future. This will be assessed further in the TES System Needs Assessment studies due to take place in 2024." pg61 *Tomorrow's Energy Scenarios Consultation Report 2023*

Clearly it is very important that when moving from the scenario modelling to the system needs assessment that this issue is addressed. Not doing so will both affect economic development options in the Western Region and will also reduce Ireland chance of making the most of its best renewable generation resources to achieve net zero by 2050. This is not just important for the OO scenario but is important to all of the scenarios as it affects the development of onshore wind generation opportunities onshore as well as offshore.

Conclusion

We welcome the opportunity to make a submission to the consultation on the on the Tomorrow's Energy Scenarios Consultation Report.

We would like to compliment EirGrid on the scenario development and modelling which is a significant improvement on the previous scenario process. As we have noted however, the process of the translation of the scenario models into grid development plans needs to be clearer.

If you would like any more information or to discuss our submission further, please get in touch with me.

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