WESTERN
DEVELOPMENT
COMMISSION

Mr Paul Corcoran
The Commission for Energy Regulation
The Exchange
Belgard Square North
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Dublin 24

24 May 2024

Western Development Commission (WDC) Response to the CRU Consultation on the Draft EirGrid Transmission Development Plan **2024-2033 CRU/202429**

Dear Mr Corcoran,

The Western Development Commission[1] (WDC) welcomes this opportunity to make a short response to the consultation on EirGrid's Draft Transmission Development Plan (TDP) 2024-2033.

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 addressed[2]. 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 2024-2033 in relation to the Border, Midland and West

> *The existing transmission network is predominantly 110 kV and 220 kV. There is limited high capacity 400 kV infrastructure in the southern part of the region. It is important to note that the Northwest area is relatively isolated from the 220 kV network and comprises of a network of 110 kV circuits, many of which are long lines, and is characterised by a strong wind resource and a low electricity demand. Development of this network is mainly required to connect a high level of renewable generation. p37*

[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.

In addition to our concerns about current onshore generation connection opportunities, 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. These areas will need significant infrastructure investment to be able to achieve the potential of our offshore energy resources.

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 investments 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 additional projects are needed and how they will be planned. The ten year horizon for the TDP (with no available energisation dates for projects beyond 2030) means that the TDP is more a progress report than a development plan. There should be additional information on the links between projects currently in the development process and those which will be needed to take account of future long term targets.

Consultation Questions

Q1. Recent legislation (S.I. 227/2022) requires the TSO to indicate to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years, out to 2033. As noted in Section 1.2 of the TDP, there are no available energisation dates for projects beyond 2030. Is this approach sufficient to meet the needs of the electricity grid over the 10 year horizon of the plan i.e. 2024 - 2033? Is there additional information that you would like to see presented?

The role of the TDP is unclear. In the EirGrid response to consultation on the TDP 2023-2032 they note that "the purpose of the TDP is to outline projects under development and with capital approval it is"[3] whereas Question 1 here suggests that the TSO is required to indicate "to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years, out to 2033". It appears that EirGrid has a more limited view of what is required in the TDP than the CRU. We do not feel that the TDP in its current form provides sufficient information (nor is it easy to find in other EirGrid reports) instead the TDP largely report on projects in progress.
We would like to see clearer information about what transmission infrastructure is required to meet grid needs in the 10 year horizon, even if these potential or necessary projects do not yet have capital approval. We would like more information about what is needed, not just what is already

[3]Transmission Development Plan 2023-2032 Consultation report https://www.cru.ie/publications/27780/

planned. Likewise, we would like a clear indication of how the current projects listed in the TDP allow the 2030 CAP targets to be met.

Q2. There is a statutory requirement for the TDP to be consistent with the National Energy and Climate Plan (NECP). Should consideration be given as to ways in which the TDP could better reflect the goals of decarbonised electricity, secure supply, empowered customers and the broader intentions of the NECP.

The TDP is required to align with the NECP, but apart from stating the high level investment drivers (i. (Security of Supply ii. Market Integration (Competitiveness) iii. Sustainability iv. Asset Management) it does not provide any information on how project decision making and projects align with the NECP. For example the draft updated NECP (published Dec 2023) provides some information on trajectories for electricity (estimated as 67.7% in 2023 (Table 4) and trajectories by RE technology (Table 5) but there is no discussion of how these trajectories align (or not) with the projects in the TDP. Nor is there any discussion of the difference between these trajectories and the targets in the Climate Action Plan (CAP) and whether and how these differences feed into or influence decisions on projects. THE NECP notes (pg 71) that the "The Plan aims to increase reliance on renewables from 30% to 80% adding 12GW of RE capacity (with peat and coal plants phased out)". Again, there is no reflection on whether this influences transmission development planning and how the projects listed in the TDP are planned in response to this.

While there is a statutory focus on the NECP for the TDP, the TDP should also reflect other national policies such as the CAP. There is no discussion or explanation in the TDP as to whether the projects discussed in the TDP are sufficient to allow the CAP 2030 targets to be met, or any explanation as to how they might do so, or in the case they will not be sufficient, what other actions might be required.

Q3. Regional network concerns have been highlighted over a number of years, including as part of last year's consultation responses, particularly with regard to the North West region. A number of projects have been included in the TDP 2024 – 2033 in that region, in Section 3.5, as candidate solutions progressing through EirGrid's grid development framework. Does the plan adequately address regional network concerns, and the North West region in particular?

We acknowledge that this TDP (2024-2033) contains more information about projects proposed for the north west than was previously included. However, we would like to see a 'bigger picture' overview of how the projects in progress and the candidate solutions for the north west (and Donegal in particular) come together to address the issues of lack of transmission infrastructure and capacity in the north west. We would like more explanation as to how they provide a solution to the long term under investment in the region, and how they will in future, give rise to a significant increase in capacity for renewable generation in the north west and in Co. Donegal in particular. As currently reported, with the focus on individual projects, it is not clear whether the combination of all of these projects will enable a significant increase in grid capacity for the connection of additional renewable generation. It appears that the incremental approach to improvement, with uprating and development of 110kV stations and the uprating of the relatively new Srananagh 220kV line may not allow this. Perhaps a clear explanation is needed specifically on how the projects in planning will substantially increase grid connection opportunities. We also have concerns that other parts about lack of transmission capacity in other parts of our region, e.g. north Mayo, where the North Connacht 110 kV Project (CP0816, energisation 31/03/2028) is likely to be at capacity once it is

energised with few further generation connections beyond those already committed becoming available.

We would also like to see more on how individual projects reported on in the TDP are going to enable the achievement of CAP 2030 renewable generation targets.

The Ten Year Transmission Forecast Statement (TYTFS) notes, in relation to the 220kV network, that

> *In general, there is very little opportunity for new generation in the North, West and South of Ireland, as well as the Dublin region. The transmission network in these areas has significant levels of connected and planned renewable generation* pg. 107

and in relation to the 110kV network

> *The results show that there is little opportunity for generation connections at 110 kV By 2031, there is a high level of renewable generation connected to both the transmission and distribution systems in Ireland. The renewable connections are concentrated in the North-West, West and South-West. The installed capacities will exceed the demand in these areas, resulting in limited opportunities for new connections without additional reinforcements*. Pg. 108

The TDP does not clearly state how the projects reported on are addressing these issues in the north west sufficiently or whether, by 2030, this situation will have changed and there will be sufficient connection opportunities. It appears from the TYTFS that there will not.

The TDP should explain which projects will change this, how they will do so, and what capacity is likely to become available as a result of the investments reported. Are the investments only going to meet the needs of projects in the pipeline? Is there sufficient capacity to meet requirements for 2023 targets? Beyond that, is there the capacity to connect the generation required and for the move to net zero by 2050 and the associated electrification?

Q4. Section 3 of the TDP outlines the projects that have either been delayed or put on hold since the last iteration of the plan. In response to the consultation on TDP 2023 – 2032 , some respondents were content with the information provided regarding changes in status to projects, while some respondents were less satisfied with the level of transparency. Has the clarity around delays and removal of projects been adequately addressed in the 2024 – 2033 TDP?

In this TDP the explanations for project removal (section 3.2) are sufficient. They reasons were both customer related and so did not require significant explanation. Likewise, there is sufficient explanations for the projects 'on hold' (section 3.4) in this TDP.

Our previous concerns about lack of information on projects which have been delayed or on hold related to large scale regional projects rather than to smaller individual projects. Where changes are made on larger scale projects, with the decision made by EirGrid, more information would be required.

Q5. Recent legislative changes (SI 227/2022) mean that the ten year TDP could be published every two years, as opposed to the present situation of at least once a year. What is your view on potentially changing the publication of the TDP to every two years (which would mean the next plan would be the TDP 2026 – 2035)? What changes would you like to see in this new plan? Note that outputs from Action 114 and Action 225 of the Energy Security in Ireland to 2030 Package may be relevant for the next iteration of the TDP.

We would like more information on how the developments in any future TDP relate to CAP targets and to meeting the demands for electrification in other sectors such as transport and the built environment. While the focus of the TDP is only on the coming 10 years it should provide some information about how projects in planning for the next ten years are contributing to meeting longer term renewable electricity generation goals.

We would like the TDP to provide more context for the projects and how they align with policy, rather than just describing policy objectives.

Q6. Under S.I. 227/2022, it is stated that the TSO shall take account of "…the use of demand response, storage or other alternatives to system expansion…" when developing the ten year development plan. Has the plan sufficiently addressed the use of demand response, storage or other alternatives to system expansion?

There is very little reference to the role of demand response or storage and how they might impact on the need for further grid development. Individual storage projects are included with generation projects. While the focus on these in the CAP is mentioned, again there is a lack of overall context and discussion of how projects in the TDP are actually meeting the CAP expectations for these.

Q7. The TDP is based on an unconstrainted scenario. In their Strategic Objectives Incentives Multi Year Plan 2024-2028 , EirGrid have detailed their approach to implementing an outage transformation roadmap, the delivery of which will also facilitate "…the optimisation of the NDP overall by providing an increasing level of certainty for project completion dates in the NDP…", through taking account of outage constraints in the NDP from Q4 of 2024. Should this approach of taking account of outage constraints be implemented into the next iteration of the TDP? If so, do you have any suggestions in relation to its implementation?
No comment on this.

Q8. Are there any other aspects of EirGrid's TDP 2023 – 2032 Consultation Report that have not been implemented to your satisfaction in the 2024 – 2033 TDP?
The issue of alignment of the TDP with the CAP has not been addressed and, as noted throughout this submission, this is still a big concern, it makes understanding the trajectory of grid development and the role of individual projects in meeting CAP targets unclear. The TDP does not provide confidence that CAP targets will be met through this TDP. CAP targets are for 2030 so it should be possible to show how the projects listed enable these targets to be met.

Q9. The CRU would be interested in the following information from stakeholders – who uses this document, how do you use the document and what do you use it for?

In the Western Development Commission we use the TDP to monitor developments currently in progress. We also use it to gain insight into planned solutions to infrastructure deficits in our region, and to understand how transmission grid planning is responding to policy set by government such as the CAP and the ORE Future Framework.
We would like the TDP to give us a better understanding of decision making in regard to transmission infrastructure in our region which has had long standing infrastructure deficits, and which does not currently have sufficient capacity for the connection of additional generation. In our region which

has some of the best wind resources in Ireland and Europe, the lack of transmission infrastructure does not allow the use of our significant natural assets.
The TDP does not provide any information on why there is a lack of focus on meeting the requirement for significant investments in our region even though such investment would contribute to enabling successful achievements of RES E targets in the CAP. We do not find the other reports referred to in the TDP provide this information in sufficient detail either (e.g SOEF or the TYTFS).

Q10. Do you have any other suggestions to improve the TDP?

Most of our suggestions are contained in the responses above. However, as it seems "the purpose of the TDP is to outline projects under development and with capital approval it is"[4], as noted in previous years, currently more up a progress report than a development plan. Unless the purpose is more clearly development planning suggested improvements are likely to fall outside the focus on projects in development. Given the time take for projects to go from stage 1 to stage 6, the ten year horizon is limiting if it only reports on projects in these stages.

The TDP suggests (Fig 1) that the TDP flows from the Generation Capacity Statement (GCS) and the TYTFS but it is not made clear how this operates in practice or how the findings of the TYTFS actually feed into the decisions about the projects selected and listed in the TDP. In other words, the process of moving from government targets and statement of need (GCS and TYTFS to project selection, as reported in the TDP, is not made clear except at a high, very general level. It would be helpful if it was clearer at a project or group of related projects basis.

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 2033 there will have been very significant changes and developments (offshore, storage, changed demand patterns) and yet this TDP does not give a clear indication of how these challenges and opportunities are being addressed in project terms.

The WDC is pleased to make this submission to the consultation on EirGrid's Draft Transmission Development Plan 2024-2033. If there are any queries concerning this submission, please contact me.

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[4]Transmission Development Plan 2023-2032 Consultation report https://www.cru.ie/publications/27780/