

Western Development Commission response to EirGrid Ten Year Development Plan (TDP) consultation

The Ten Year Development Plan consultation response was submitted using EirGrid's consultation portal. This is a record of the responses submitted.

Responses to the Questions in the TDP consultation

Q1. What are the main purposes for which you use the TDP? Do you use any other source to obtain the same information?

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 in many parts does not currently have sufficient capacity for the connection of additional generation. With some of the best wind resources in Ireland and Europe, the lack of transmission infrastructure in the west and north west 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 feel that the TDP in its current form provides sufficient information (nor is it easy to find in other EirGrid reports) instead the TDP is largely a 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 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. The current TDP includes an extensive number of tables with project information. Which of this project information is beneficial to you?

We acknowledge improvements in the most recent TDP including the more timely data freeze date and better alignment of the ten year timeline. 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, nor on how the projects address them. For smaller, simpler projects this information is adequate.

We do not feel the TDP, in Tables or elsewhere, provides sufficient information, in relation to recent Climate Action Policy and Security of Supply programmes. nor on how 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. 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 the next ten years and which will have the potential to adapt to the even bigger targets for 2050.

Q3. Would it be beneficial to access this information through the Network Delivery Portfolio (NDP) or another similar database which is updated periodically and available on the EirGrid website?

While improvements in the information provided in the TDP have been made, given that the TDP is now a biannual 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.

It would be helpful to link projects to specific challenges and to provide some detail on the challenges which drive the project need. While links can usefully be given to the documents more information should be provided in the TDP itself.

Our concern about using the NDP as the main source of updates and current information is that, as an online database, we could have difficulty tracking changes made to the projects to be planned and developed over time. For example a progressive downgrading or changes to projects might be hard to track retrospectively. Currently the published TDPs can be compared to check for changes over time.

Q4. In what ways could a greater emphasis on major reinforcement and connection projects with less focus on minor projects enhance the value of the TDP for you?

We acknowledge that the most recent TDP (2024-2033) contained 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. A shift away from minor project to focus on more major reinforcement and connection projects will only be helpful if full detail of the context of the investments, expected outcomes and future capacity are included. A clear explanation is needed specifically on how projects in planning will substantially increase grid connection opportunities.

We would 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 TDP, as it stands, does not clearly state how the projects reported on are addressing the issues in the north west or whether, by 2030, this situation will have changed and there will be sufficient connection opportunities.

Thus we would welcome a shift from reporting on plans for minor projects to larger scale project only if more detail, background and expectation of project outcomes are provided.

Q5. Would you like to understand more about EirGrid's network planning and development approach?

The TDP provides a general review of the investment drivers and system needs but does not give any specifics or details relating to particular areas or investments. The need for investment in the north west and west, the requirements of potential offshore wind developments on the west coast and the location of demand have not been discussed in enough detail in the TDPs. A more detailed picture of the issues, with data on current and future demand and supply issues trends as they impact the transmission network in the TDP would help us to understand more about EirGrid's network planning and development approach.

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 general in recent TDPs 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 mid 2030s that some offshore wind projects could already be in place off the West coast. This is not acknowledged in the plan, nor is the government target of 37GW of ORE 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.

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. Given that one of the proposed Broad Areas of Interest for offshore generation listed in the OREDP2 consultation was off the Donegal coast it is likely that this will also influence the scale and type of potential network solutions. This was never acknowledged in the TDP, although the potential for offshore renewable generation in the North West has been clear for some time.

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 2040 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?

The issues of alignment of the TDP with the CAP and other government policies have not been addressed in this consultation 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, as it is currently formatted, does not provide confidence that CAP targets will be met through this TDP. CAP targets are for 2030 and continue

beyond so it should be possible to show how the projects listed enable these targets to be met. In order to allow us to understand more about EirGrid's network planning and development approach this needs to be addressed specifically project by project, rather than, for example, providing a broad description of the scenarios developed in SOEF.

Q6. Do you have any specific comments or suggestions relevant to the proposed refinement of the TDP as outlined in this consultation?

While we acknowledge, and welcome, some of the improvements in the TDP format over recent years, 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 the mid 2030s, and little on what is in early stage development but will be advanced or completed by 2030.

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. 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.

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. Otherwise the purpose of the TDP publication is unclear.

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