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OF IRELAND

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### **EAI Response to Offshore Grid Options Paper**

**By email to [OffshoreWind@dccae.gov.ie](mailto:OffshoreWind@dccae.gov.ie)**

EAI welcomes the opportunity to respond to this consultation to inform a grid development policy for offshore wind in Ireland. EAI's vision is for a decarbonised future powered by electricity and so the policy and regulatory framework for connecting new offshore wind is of significant interest to us.

### **Making Offshore Wind Happen**

Offshore wind is undoubtedly a key requirement to meeting 2030 targets and to set us on the appropriate trajectory for 2050. To this end, it is important that the various policy and regulatory strands required to accommodate offshore wind are moved along in tandem;

- The Marine Planning and Development Management (MPDM) Bill needs to be enacted as soon as possible to ensure the offshore wind potential can be realised and brought to market as soon as possible
- A low carbon energy system will require new infrastructure build and upgrading of existing grid. Ireland needs a planning and permitting system that matches the ambition of Government and to this end projects need an effective route to permitting which facilitates full and proper public participation in the planning process. To this end, the establishment of an Environmental and Planning Court, as signalled in the Programme for Government should be brought forward without delay.
- The RESS Scheme will need to be evolved to accommodate large scale offshore wind projects with the early bringing forward of any new proposals being important for offshore developers.
- The electricity System Operators (SOs) must be resourced to accommodate decarbonisation ambitions through accommodating new offshore connections, reinforcing the onshore electricity grid and accommodating significant onshore generators and demand connections. Therefore, the importance of delivering a PR 5 that matches Ireland's climate ambitions cannot be understated.
- The ability to utilise hybrid connections (multiple technologies at a single connection point) must be facilitated without delay. Hybrid connections offer the opportunity to greater utilise existing transmission assets to deliver the low carbon electricity that we are striving for. There are actions associated with their delivery in the Climate Action Plan and these must be delivered against.

### **Offshore Grid Models**

Turning to the issues under consideration in this consultation, the options put forward in the Navigant report appropriately cover the spectrum of approaches available to develop an offshore wind industry. In addition, the assessment criteria or key considerations presented in the report cover the issues that should be considered in coming to a decision on the framework.

As noted above, our members view offshore wind as being integral to Ireland's achievement of the 2030 targets and to ensuring the wider objectives of 2050 are realised, as well as the economic



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opportunity it presents for Ireland. There are many competing objectives in meeting 2030 targets not least speed in delivery versus getting every part of the framework right. They key will be balancing these and EAI would offer the following observations in terms of striking that balance for 2030;

- Getting an offshore wind industry off the ground in Ireland and delivering upon 2030 targets requires the coming to market of projects quickly. There are several projects which have been termed “legacy projects” and some other projects coming close behind them which provide a route to an offshore buildout before 2030. These early projects, which presumably already have significant works carried out, should be a key consideration in deciding the initial regime to connect offshore wind.
- All new projects regardless of them being onshore or offshore must be connected to the onshore transmission system and that system must be ready to accommodate these new connections. To this end, EirGrid, as TSO will need to play a central role in planning the grid to accommodate all the new connections in the most efficient way. As part of this, EirGrid should seek to provide transparency to prospective developers on where there is available capacity on the system. All of this should include EirGrid explicitly horizon scanning new projects and including anticipatory reinforcement and expansion provisions in its transmission development plans with an understanding that the CRU will allow such provisions once done prudently.
- The projects that can contribute to 2030 are already in existence and will need to progress without delay if they are to do so. Grid development and reinforcement planning for this phase must facilitate these project timelines being achieved and cannot introduce process or approaches that could result in unnecessary delay. However, where possible and respecting these constraints, the grid should be optimised, with efficient grid build-out minimising the overall cost for customers.
- EAI does not support minimum distance from shore being a defining feature any offshore grid framework developed on foot of this consultation. This issue sits firmly within the area of marine spatial planning and should be considered as part of the development of the National Marine Planning Framework (NMPF) and Marine Planning and Development Management Bill (MPDM).

Taking the above together would support a developer led offshore wind framework for 2030 corresponding to an amalgamation of the best parts of Option 1 and Option 2 in the Navigant report. Developers would lead on getting the projects permitted, developed and commissioned while the TSO would hold an important transmission planning role to best plan the grid and new connections to it. Such an approach would explicitly require anticipatory reinforcement of the onshore grid by the TSO also. EAI stands ready to work with DCCAE on identifying the appropriate features of Options 1 and 2 to take forward.

As discussed above, the approach to 2030 will involve mobilising projects quickly and getting them connected. As set out in the Navigant report, these projects are likely to be on the east and southern coasts of Ireland and to be close to shore. In the longer term, when considering the offshore windfarms more towards the west coast, the purely developer led approach to transmission grid might not be the opportune solution. This is because Ireland’s coastal waters cover a greater distance from shore, with onshore transmission network in the west much more limited in capacity, and so the case for connection through offshore hubs becomes stronger;



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- EAI can see the case to move to a more centralised model for transmission grid as development moves past the east and south coasts particularly as proximity from shore for projects increases. This model will need to consider many issues including interactions with wider international offshore grid plans and projects which might not connect to the onshore grid or which might be developed for hydrogen production.
- The Navigant report links the more centralised models 3 and 4 with a new public body which would be established to carry out site identification and permitting. EAI believes that it should be possible to separate the generation development from the transmission development where the developer can be responsible for siting and permitting of the windfarm itself while the TSO leads on transmission development.
- Moving to a more centralised model should not hinder any project which is ready to develop before the model is operational and so, if a project is ready to proceed it should be allowed to proceed under the initially established model.

Considering the above, EAI can see the case to move to a more centralised approach to transmission development for windfarms towards the west coasts given longer proximity from shore considerations. Depending on the approach taken for the east and south coasts in the interim, the longer-term model may just be an evolution of the initial model rather than needing to have two separate models.

Finally, the coming years will require a massive all of energy system effort to realise Irelands climate ambitions and to meet our 2030 targets. It is important that all parts of the system are appropriately resourced. There will be significant upfront work by CRU to implement the finer details of the policy and regulatory framework developed on foot of this consultation. It is important that CRU is appropriately resourced to carry out this work in a timely manner and to meet the many other obligations has through the Climate Action Plan.

We hope you find the above useful as you finalise the approach for connecting offshore windfarms. We are available to meet you to discuss any aspect of this response.

Yours sincerely,

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Electricity Association of Ireland(EAI)