



equinor

Offshore Wind Grid Development Consultation
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Offshore Grid Delivery Model Option Consultation

Equinor ASA welcomes the opportunity to respond to the Consultation to inform a grid development policy for offshore wind in Ireland.

Equinor is developing as a broad energy company, building a material position in renewable energy. Equinor now powers more than one million European homes with renewable offshore wind from four offshore wind farms in the United Kingdom and Germany. Equinor is currently building material offshore wind clusters in the UK, the US North East and in the Baltics. The company commissioned the world's first floating offshore wind farm in 2017 off the coast of Scotland and is positioned for future floating wind options in several geographies. Equinor and ESB announced on 21 November 2019 a partnership which will work to identify suitable sites for new offshore windfarms in Irish waters and work to mature potential future wind projects. It is the ambition of the partnership to explore opportunities for large scale wind projects towards commercial operation by 2030, thus contributing to the wider goals of the Irish Government on energy transition.

Ireland has ambitious climate targets towards 2030, including a target to develop at least 3.5 GW of offshore wind energy, as published in the Climate Action Plan (CAP) in June 2019, and recently increased to 5 GW in the Programme for Government. Ireland has a high potential for offshore wind, including floating offshore wind on the west coast, and it will be important that the grid connection policy as well as the support scheme encourages the development also of floating wind.

The grid development policy for offshore wind as described has wider implications than issues related to grid development. The choice of grid development model will have to align with the other regulations relating to offshore wind, and hence will affect other aspects of wind farm development, such as financing and route to

market.

Based on the options and information given in the consultation paper and Navigant report and Equinor's experience as an offshore wind developer in several different markets, Equinor have structured the response as a general feedback rather than responding to the list of more specific questions raised in the consultation.

Equinor's position is that delivering the grid capacity for offshore wind is key, and in our view the developer-led approach is the preferred option to be able to deliver on the ambitious 2030 targets (option 1 or 2 with adjustments). Developers have the experience and capacity to manage the risks, both with regards to technical, consenting and financial aspects. The ownership and the responsibility of the Operation and Maintenance (O&M) for the connection assets should remain with the developer as the sole user of the assets. The developer-led model will allow the Relevant projects to proceed without delay, and with a proactive planning and coordination of the onshore grid by EirGrid it will work well for projects towards 2030.

Introducing a centralised plan-led approach now gives a high risk of delays in project delivery and failure to meet the 2030 targets.

EirGrid's East Coast study indicates around 1,5 GW of available capacity for connection of offshore wind on the East Coast of Ireland without significant transmission reinforcements. To be able to reach the 2030 target of 3,5-5 GW a proactive engagement from EirGrid is required.

The consultation paper outlines the advantages and disadvantages of the 4 different proposed options, and points to several important aspects and considerations that has to be taken into account in the short, medium and longer term. For the longer perspective, a more coordinated approach will be required for onshore and offshore development, however Equinor is of the opinion that a step-wise transition from the developer-led to a more coordinated or plan-led approach is the way to go, starting with a developer-led model including a proactive engagement from EirGrid and moving towards a more plan-led development model, but keeping the involvement from the developers. Development of a long-term grid development policy will also need to align with other regulations for offshore development that are not directly related to grid development such as offshore spatial planning, area allocation and support schemes. We note that option 2 as described also includes that the State should set a minimum distance to shore for offshore wind farms. We do not agree that this is related to the Grid Development Policy and should instead be assessed in relation to assessments of the relevant areas that will be made available.

In the Climate Action Plan it is set out a policy objective for hybrid connections to increase the RES-E penetration. Equinor has together with partner ESB looked at the opportunities for utilizing existing thermal power generation connections by co-location of thermal and offshore wind generation as a way of connecting more generation without having to wait for deeper reinforcements of the transmission grid. This can be defined as a type of hybrid connection (Hybrid Offshore Wind), and Equinor supports ESB GT's proposal to progress policy and regulations to allow for this type of connection to enable a more rapid offshore wind development. Changing the regulations to allow for this type of hybrid connection would unlock access to significant additional grid capacity with very little requirement for additional infrastructure, and hence these projects should be possible to realize with lower cost, less environmental impact and with no risk of delays due to onshore grid development and construction.

In summary Equinor advice that a developer-led solution with proactive engagement from EirGrid for the onshore transmission development is chosen and furthermore utilizing the opportunity for hybrid connections (Hybrid Offshore Wind) to make sure Ireland reaches the 2030 targets. The move towards a

more coordinated approach (more centralized/plan-led) in the longer term should build on the experience in the established industry and with a step wise approach with high stakeholder involvement.

Yours sincerely,



Equinor ASA