



Date: 8th March 2022

To Whom It Concerns:

On behalf of Atlantic Offshore Renewable Energy and Celtic Offshore Renewable Energy, we welcome the opportunity to submit a response to be considered in the development of the policy framework for Phase Two ORE developments.

As an interested party, we wish to submit a response to this consultation specific to **Consultation Question 11**.

11. Should any special allowances for innovation technologies be included in the Phase Two process?
- What technologies should be provided with special allowances and why?
 - What allowances should be made? At what stage(s) of the Phase Two process? Should capacity be reserved in the MAC and ORESS processes for any of these technologies?
 - Should these types of projects also be required to deliver by 2030?
 - What level of offshore wind capacity could be deployed before and after 2030 that does not depend on the Irish grid for offtake? i.e. generation that is instead utilised for non-grid offtakes such as green fuel generation or export by cable to another jurisdiction?

Response:

Atlantic Offshore Renewable Energy and Celtic Offshore Renewable Energy are all based on Floating Wind Technology and have been carefully selected with grid connection in mind, but also to support longer-term renewable energy ambition as stated in the Phase Two MAC Consultation where floating wind and green hydrogen production are key per Section 7 “Innovation Categories” of the Offshore Wind Phase Two Consultation paper.

It is for this reason that we believe projects with a plan of utilising floating wind for the purpose of non-grid offtakes such as green fuel generation production should fall within an “Innovation Category” for Phase Two, and these projects should be progressed now rather than waiting for the Enduring Regime to begin, which in turn enables further acceleration of Ireland’s longer-term renewable energy ambitions.

While we feel these projects should be included in the Phase Two process and progress should begin immediately into their design, planning and development, given the innovative nature of these projects they should not be required to deliver by 2030, but instead a clear project roadmap should be provided by the Developer as part of the MAC application.

For the three sites under Atlantic Offshore Renewable Energy and Celtic Offshore Renewable Energy, the combined offshore wind capacity that could be deployed is circa 9000MW. Of this, it would be expected that circa 8000MW of generation could be utilised for non-grid offtakes such as green fuel generation or export by cable to another jurisdiction.

Special consideration could be had for projects that are likely to be viewed positively by ABP and relevant community and stakeholder groups such as projects with a presence outside 12NM where visual impact from land is minimal; projects that use floating technology thus minimising marine or environmental impacts on the seabed; and projects who can demonstrate sustainable decommissioning of the array in the future by using floating technology.

Thank you for the opportunity to submit a response to be considered in the development of the policy framework for Phase Two ORE developments, and we look forward to the final guidelines in due course.

Regards,

Atlantic Offshore Renewable Energy and Celtic Offshore Renewable Energy Project Team