Call for Expert Evidence 2022,
Environment and Climate Action Plan Delivery Division,
Department of the Environment, Climate and Communications,
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20th September 2022

EDF Renewables response to DECC's Consultation on Call for Expert Evidence - Climate Action Plan 2023

EDF Renewables (EDFR) is part of one of the world's largest electricity companies and our investment and innovation is bringing down costs for consumers and delivering significant benefits for communities. We operate in more than 20 countries around the world. We develop, construct and operate wind farms (onshore and offshore), solar and battery storage projects, and have more than 25 years' experience in delivering renewable energy generation.

We are in advanced discussions in relation to an onshore wind development pipeline of almost 1 GW with aspirations for far greater growth in Ireland across all technologies. This ambition is illustrated by our investment in 50% of the Codling Offshore Wind Park Development, off the East Coast of Ireland, an onshore wind pipeline and the development of a solar portfolio which now has projects energised and exporting.

EDFR welcomes the opportunity to engage with DECC and to respond to this consultation. We welcome the accelerated pace at which the Government is moving, to ensure that Ireland will be enabled to achieve our future climate ambitions of 80% renewable electricity and 7 GW of offshore installed capacity by 2030, as set out in the Programme for Government and the Sectoral Emissions Ceilings.

Our key message to the Government is that a plan of action is urgently required to deal with the Climate Crisis and to handle each of the headline concerns that we've raised below, concerning future renewable generation development. EDFR welcomes the opportunity to work with the Government on the detailed policy actions that are needed to enable further renewable energy development. For the purposes of this consultation, we would like to highlight the most significant issues that the Government should concentrate attention on. We are responding to the questions in this consultation that are most relevant to our activities. We have set out our answers in our submission below.

In summary, EDFR believes that:

- An expanded grid infrastructure network, that enables a large volume of renewable projects to connect across the island of Ireland, is critical to the increased development of renewable technologies and the decarbonisation of the system.

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- The combination of a clear and stable support scheme, such as the RESS, and a planning system that is timely and proportionate is key to incentivising a low carbon renewable project buildout, both for onshore and offshore renewable technologies.
- In EDFR's view there is an opportunity for the Government to step up its Climate Ambition by addressing the key issues of cost, offsetting investment through lower bills, and improved system flexibility/demand response. Furthermore, there is an opportunity for Government policy to direct that public bodies become the standard bearer for Net Zero and the appropriate policy implementation at local level.

In conclusion, we would like to thank The Department of the Environment, Climate and Communications for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact [redacted] or me. I confirm that this letter may be published on the DECC website.

Yours sincerely

[redacted]

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Responses to specific consultation questions on Electricity

Question 1: What options are available to increase the penetration of renewable electricity beyond the up to 80% committed to in Climate Action Plan 2023?

- **Clear and stable support scheme**: EDFR believes that a clear and stable support scheme is necessary to increase the penetration of renewable electricity beyond the 80% by 2030, as committed to in the Climate Action Plan (CAP) 2021. The continued, timely implementation of a support scheme such as the existing Renewable Electricity Support Scheme (RESS) can promote significant expansion of wind (onshore and offshore) and solar-power generation.

- **The Electricity Grid**:
    - The current grid development strategy is focused on delivery by 2030, and does not consider beyond, towards a net zero future. The existing Roadmap, "Shaping Our Electricity Future", will not deliver significant strategic capacity beyond the current renewable electricity targets. Significant network capability to allow for additional renewable capacities beyond 2030 will be needed for further decarbonisation and to account for electrification and green hydrogen generation as well as other increasing demand. The power system should be planned, designed and developed beyond 2030, to minimise the lag between societal development and needs and network deployment.
    - A stable and expanded grid infrastructure is critical to opening up areas of the country that are under-developed due to poor grid infrastructure. One of the main barriers to further renewables development on the existing grid is its limited capacity to handle the increasing volumes of variable renewable power on the system. Dispatch down (i.e., system-wide curtailment or localised constraint), is a major issue for renewable projects. Key to minimising this will be ensuring sufficient capacity in the transmission system to enable higher system non synchronous penetration (SNSP) levels and lower fossil fuel minimum generation levels through the DS3+ programme. Key steps to minimise curtailment should include:
        - Increasing the transmission grid capacity for existing and new circuits. Developing a DS3+ programme to relieve existing operational constraints in line with EirGrid's strategic objectives to run the system with up to 95% non-synchronous generation and establish a target for minimum conventional generation of 400 MW. Higher RES-E penetrations could be enabled by the complete removal of operational constraints.
        - Delivery of the Greenlink Interconnector by 2023 and Celtic by 2026. Developing an enduring interconnection policy regime by Q4 2022 and having additional interconnectors in development by 2025. Enhancing interconnector operation so that they able to export approximately 90% of their capacity during curtailment events.

- **Dispatch Down Compensation Certainty**: This could be implemented in the short-term via the transposition of Articles 12 and 13 of the Electricity Regulation in the Clean Energy Package (CEP). In the longer term, CRU should establish a roadmap explaining how dispatch down will be

managed over the next decade, minimising the cost to the consumer while also incentivising investment in renewable electricity to achieve the target 80% RES-E by 2030. At present, without dispatch down compensation, it is unlikely that 2030 targets will be met and, if they are, they will be met at unnecessarily high costs to the consumer.

- **Connecting Onshore Renewables:** Complying with Government's carbon budgets necessitates earlier connection of more onshore renewables. Transmission capacity solutions in SOEF v1.1 need to align with the onshore wind and solar pipelines currently working their way through the planning system. We must identify solutions to support the 2030 8 GW & 5.5 GW targets for onshore wind and solar respectively. Onshore renewables will play a key role in reducing emissions from 2022 - 2027, in reducing wholesale energy costs in this timeframe, and in paybacks to consumers through the PSO Levy.

- **Connecting Offshore Renewables:** SOEF v1.0 proposed solutions for the east-coast Phase 1 offshore renewable projects. In our view, SOEF v1.1 must identify additional transmission capacity solutions to support the south and west coast projects and the new 7 GW 2030 offshore target. Clarity on firm access policy will be crucial for both offshore and onshore renewables.

- **Beyond 2030**: A Net-Zero energy system requires a much larger Net-Zero power system. Development of the transmission and distribution solutions to support the full decarbonisation of the energy system in the period 2030 to 2050 needs to start soon. SOEF v1.1 should establish the groundwork for a Net-Zero power system by 2035 at the latest.

- **Market Reform:** The energy market was designed around the short-term marginal cost of production since it was originally designed with fossil-fuelled power plants in mind, where marginal costs (i.e., the price of fuel) were typically the most significant expense driven by coal, gas and oil prices. The electricity sector will continue to change rapidly over the next decade and therefore the electricity market needs to keep pace with these changes. The energy market is moving from one based mostly on fossil fuel plants and recovering short-term marginal costs, to one based on renewable electricity with little to no short-term marginal costs, but with a need for longer-term price supports. Therefore, we recommend as an action in the final CAP 2023 that the market operator, SEMO via EirGrid, the CRU and DECC should put in place a dedicated team to focus on what the electricity market design should be in 2030 to facilitate a power system with at least 80% of demand being met by renewables.

- **Planning**: We recommend that, to ensure pre-planning success, the appointment of consultants should be made, to prepare the Regional Renewable Energy Strategies on behalf of the three Regional assemblies, and the associated Strategic Environmental Assessments (SEA) and Habitats Directive Assessments (HDA). DHPLG should brief and instruct Regional assemblies on the urgency of proceeding with Regional Renewable Energy Strategies, and outline proposed approach for preparation, funding, etc.

- **Strategic infrastructure development (SID) Success**: We would advise the DHPLG to legislate for the suggested new SID pre-application stage in a revision to the Planning and Development Act

by seeking formal or informal input from An Bord Pleanála (ABP) and industry stakeholders on the need for change to the SID process.

- **ABP Decision Timelines:** The Government should improve ABP decision timelines by reducing them to 18 weeks for all decisions. The DHPLG should legislate for the suggested new ABP decision timeframes in a revision to the Planning and Development Act for SID decisions, JR referrals and appeals. We recommend that to begin with, the DHPLG should seek formal or informal input from ABP and/or industry stakeholders on how to change the SID decisions, JR referrals and appeals processes/timelines.

- **Security of Supply:** Finally, we would suggest that the CAP 2023 would include a roadmap to replace our fossil-fuel based back-up generation, while ensuring security of supply. Ireland currently uses gas and coal generators to back-up the electricity system and ensure it remains secure. We strongly advise that work starts now to replace these with low and zero-carbon technologies like battery storage, new interconnectors, and demand-response technologies which lower electricity demand at times of tight supply. We support the WEI proposal to introduce fast-acting gas turbines, which can be converted to run on green-hydrogen derived from renewable generation in the long run.

Question 2: What can be done to accelerate/facilitate the delivery/deployment of offshore wind and solar PV in particular, in the context of Climate Action Plan 2021 and the REPowerEU ambition?

- **Clear and stable Support scheme**: EDFR believes that a clear and stable support scheme is necessary to increase the penetration of renewable electricity beyond the 80% by 2030, as committed to in the CAP 2021. For ORESS 1, a firm commitment on the date for the first auction should be communicated as soon as possible, along with clarity on the timeline for further auctions and how to include a preference category to support floating wind energy. We acknowledge that a provisional date has been set for the first ORESS auction, and would welcome direction on Phase 2 together with a firm date for auctions beyond 2023.

- **Grid access**: A reliable, stable, expanded electricity grid for both onshore and offshore renewable energy projects is crucial for the success of Ireland's renewable ambitions to 2030 and beyond. At present there is not sufficient capacity and we are concerned that there aren't proposals that will expand this capacity in time. Additionally, we would urge EirGrid's grid development strategy, when published, to seek strong political and public support right across Irish society.

- **Offshore Grid Steering Committee:** We recommend that this be set up to bring together industry, EirGrid, the CRU and DECC to ensure the successful implementation of the new offshore grid model, to develop technical offshore grid standards and to rapidly process grid offers.

- **Marine Spatial Plan:** We believe that Ireland's marine spatial plan is essential for facilitating the deployment of offshore wind energy in Ireland, achieving our future climate ambitions and central to achieving 80% renewable electricity by 2030.

- **Foreshore Licence Application**: Projects aiming to deliver for 2030, including those set to compete in an ORESS auction in less than eight months are still experiencing significant delays in the Foreshore Application process. Therefore, we strongly advise that foreshore licence applications must be processed as quickly as possible, in order to prevent further delays.

- **Efficient Planning Process:** A shorter onshore planning process timeline is crucial to increasing the uptake of offshore wind. A number of factors should be addressed which include resourcing, JR's, and funding. Developing 7 GW MW of offshore wind energy by the end of 2030 will place an enormous burden on the relevant Government departments, An Bord Pleanála, NPWS, EirGrid, ESB Networks and the CRU. While we note that some additional resources have been allocated to the Marine and Climate Unit in APB, this is not sufficient, and we believe that these bodies must be adequately funded in the coming budget.

Question 3: What role does renewable gas have in the power generation sector?

- **Green Hydrogen:** In our view, "green" hydrogen (i.e., hydrogen produced from electrolysis using renewable electricity) may have a long-term role to play in the energy system, as it will allow for higher input from renewable energy sources like wind and solar power. For example, in hours when renewable energy production exceeds demand, the excess energy can be used to produce hydrogen.

- **Renewable Methane and Hydrogen:** The use of renewable methane and hydrogen for electricity generation may play a more transitional role. Renewable gas will not play a large role in power generation (as there are many other low cost, low carbon options available), although it may play a greater part in decarbonising heating and other applications. Renewable gas could be used for short periods in combustion-based generators to provide system support. Using the existing gas network and renewable gases, such as biomethane (which has already been introduced onto Ireland's gas network) and hydrogen to reduce emissions, could enhance Ireland's energy security.

Question 4: What role could carbon, capture and storage have in decarbonising our power sector?

- **Minimising carbon emissions:** Carbon Capture and Storage (CCS) can be applied to many industrial processes and other sources of carbon emissions. CCS may play a role in minimising carbon emissions in those sectors where full decarbonisation is not possible, nor realistic. Those industrial sectors that do not have immediate low carbon alternatives readily available should be the priority for the application of CCS, rather than the energy sector, which already has a wide range of deployable, low cost, low carbon options.

- **Decarbonising the power generation sector:** EDFR's view is that CCS will play, at most, a targeted transitional role in decarbonising the power generation sector. The most likely potential application will be to reduce emissions from fossil generation plants retained to provide dispatchable sources of power for system security. However, it is also possible that the expansion

of storage and demand management will be sufficient to maintain system security and CCS will not be required in the power sector.

- **Negative carbon emissions:** In the longer term, CCS could enable negative carbon emissions to be achieved by the power sector, if combined with bioenergy from sustainable sources. Negative emissions can counterbalance residual emissions in other sectors that are harder-to-abate, helping to deliver net zero for the economy as a whole. However, for power sector decarbonisation itself, CCS is not required as a long-term solution.

- **Carbon Tax:** In EDFR's view, the introduction of a Carbon Tax to encourage CCS investment would be a welcome development.

Question 5: What other opportunities exist to support the decarbonisation of the electricity sector?

- **Electricity Transmission Grid**: In EDFR's view, a strong, reliable and flexible electricity transmission grid is essential for the continued development of onshore renewable energy and the development of offshore wind. There is currently a disconnect between the scale of government's ambition for variable renewable electricity and the existing grid's capacity. If the system operators can build the grid infrastructure necessary to enable the development of our renewable electricity ambition, then this will encourage investors to develop in Ireland, and enable Ireland to meet its targets of 80% renewable electricity by 2030, in turn decarbonising the electricity sector.

- **Marine Spatial Plan:** We believe that in order to unlock Ireland's offshore potential, a marine spatial plan is essential for facilitating the deployment of offshore wind in Ireland.

- **CEP:** The full implementation of the Clean Energy Package Implementation (CEP) Articles 12 & 13 of the Electricity Regulation is currently not mentioned in the CAP, but this is an extremely important area for the continued growth of renewable energy. The CRU must develop a roadmap for implementation, including roll-out of the market interfaces to allow renewable generators to participate fully in the electricity market. We suggest an action in the final CAP 2023 requiring the CRU, in co-operation with URIGNI via the SEMC, and the System Operators, to implement the Articles 12 & 13 in a manner that is compliant with the provisions of the regulation and one which supports delivery of CAP targets by 2030 at the least possible cost to consumers.

Question 6: What measures might be taken to improve the resilience of the electricity system to the impacts of climate change?

- **Stable Policy Framework:** EDFR believes that a stable policy framework, with clear long-term targets and revenue streams will be key to the delivery of a resilient electricity system. Clear mechanisms, such as a support scheme, are necessary to incentivise investors to ensure the deployment of low carbon generation.

- **Adaptation Strategy:** Climate change will bring about a need for adaptation in the face of weather system changes, potential for flooding, extreme summer versus winter temperatures etc, and a clear strategy is required to deliver a more resilient grid.

- **Electrical Grid Resiliency:** There is a role for hydrogen, long-duration storage, and interconnection to improve resiliency of the electricity system to the impacts of climate change. A resilient electrical grid is crucial to allowing enough volumes of renewable electricity on to the system to deliver decarbonisation targets. A generation mix with a high proportion of variable renewable generation will require a more complex operating system which can cope with higher levels of variability in supply.

Question 7: What role do you see for electricity storage and demand-side response in providing flexibility to a system comprised of high renewable penetration and in supporting the decarbonisation of the electricity sector?

- We believe that every effort should be made to maximise the use of demand side response as it is likely to be the cheapest source of flexibility on the system.

- However, the energy management challenges (i.e., the requirement to time shift very significant renewable energy volumes) associated with an 80%+ system, will likely far exceed the capability of demand side response. This will only increase as we work towards a fully decarbonised power system. In this regard, we would see a key role for increased storage deployments, particularly long duration storage technologies, with the ability to absorb significant quantities of energy over extended time periods.

- We support the Energy Storage Ireland (ESI) response which states that energy storage will play an essential role in facilitating the higher levels of renewable generation on the power system required to achieve national renewable electricity targets. The flexibility of storage systems and their ability to contribute to the energy, capacity and system services markets allows them to deliver a wide range of benefits to end consumers such as wholesale energy price reductions, reduced CO_2 emissions and flexible system support services to help manage the grid with higher levels of renewables.

- In May 2022, ESI and Baringa published 'Game Changer' a report showing the benefits that various durations of energy storage can bring to the system and to end consumers on the island of Ireland by 2030. In order to accentuate why more emphasis should be put on energy storage in meeting Ireland's 2030 and 2050 climate ambition, we have highlighted some of the key findings from this below:

    - By participating in the Irish day-ahead energy market, energy storage can reduce day-ahead carbon emissions by 50% by using long-duration storage technologies. This makes a material contribution to meeting ambitious 2030 power sector decarbonisation goals.
    - Strategic deployment of energy storage in transmission constrained regions of the network reduces the dispatch-down of renewable generation from constraints without the need for network reinforcement, unlocking additional carbon savings.

- By contributing to security of supply, helping to support renewable capacity, and displacing fossil fuels in the balancing market, energy storage can deliver a net saving to end consumers in Ireland of up to €85m per year.
- These benefits are additional to the carbon, renewable curtailment, and end consumer savings offered by energy storage through the provision of zero-carbon system services.
- Energy storage helps the integration of renewables at all stages by ensuring that generation is not wasted; reducing oversupply by up to 60%, constraint volumes by up to 90%, and curtailment by 100%.

Question 8: What financial incentives are needed to increase renewable generation capacity?

- **Indexation:** The additional risk taken on by a project with no indexation in RESS results in higher bid prices into the RESS auction. Successful auctions in Europe index-link their strike prices, however, in Ireland renewable projects need to bid a price that will cover the next 15 years of inflation, which is impossible to predict. Index-linking auctions means lower prices, greater transparency for consumers, and increased deliverability of successful RESS projects due to protection against rapidly changing supply chain costs. The inclusion of indexation in ORESS 1 contracts will make inflation a more manageable risk for investors, decreasing bid prices. Alignment of the RESS 3 policy with proposed ORESS 1 policy would be a sensible measure in our view. The majority of Corporate PPA (CPPA) contracts are index-linked which makes them an attractive route to-market for investors. The higher the volume of CPPA contracts, the lower the volume of generation entering in the RESS auctions. Index-linking RESS would put it on a level playing field with CPPAs and lead to increased competition which will ultimately deliver lower prices.

- **Grandfathering:** The SEMC issued a Decision (SEM-022-009) in March 2022 regarding the implementation of Article 12 and 13 of the Clean Energy Package (CEP). One of the core issues with the Decision is that, at some point post-2026, there will be "grandfathering" of constraints for all new generators. This means that when there is a need to turn down renewables to solve a network congestion problem, new generators (including all RESS and ORESS projects) would be turned down before any existing contracted generators as they do not have Priority Dispatch status, which existing contracted generators have. This poses major risks to future renewables delivery, in that constraint levels for new projects could outturn 2-5 times higher, according to WEI, for new generators compared with constraint levels if dispatch down were to remain on the current pro-rata basis. In our view, clarity is needed regarding grandfathering of constraints and compensation in relation to this issue. Whilst this uncertainty remains it only serves to impact future RESS auctions, pushing up prices for consumers, who will face higher electricity bills than anywhere else in Europe and GB, at a time when prices should be coming down.

- **Dispatch Down:** While generators are compensated for curtailment above a level of 10% for two consecutive 'PSO Levy Years' in the RESS 2 T&Cs, no compensation is offered to generators in the event of oversupply curtailment. Oversupply of renewables has not been an issue within the electricity market to date; however, with the intention of adding roughly 10 GW of renewable power to the market by 2030, oversupply will become a serious risk for future investment and the risk of this is completely outside of the control of the project developer/investor. No

oversupply curtailment compensation exists within the RESS 2 T&Cs. The inclusion of oversupply curtailment in RESS 3/ORESS 1 would decrease clearing prices. The impact of volatile and uncertain constraint levels on the future network is also a concern impacting clearing prices and it would be prudent to address this ahead of the next round of auctions.

- **Longstop Dates:** The longstop date (31/12/2025 in the case of RESS 2) defines when a project must reach commercial operation to successfully meet its obligations under a RESS contract. Longstop could be extended in future auctions to allow more projects to participate in the auction, thus increasing competition and lowering prices. Erosion of support against a fixed end date is a much more manageable risk for project investors than a fixed longstop date. This change would facilitate a broader range of investment strategies and increase participation in the auction. It would also help to mitigate potential risks posed by Judicial Reviews (JRs) and by delays to grid connections.

- **TLAF & TUoS Charges:** Accurate modelling of TLAF & TUoS charges is complex and currently there are no ways to model future TUoS charges. These charges depend on grid infrastructure and are charged to a connected generator on a yearly basis. In other words, a lack of grid development in parallel with an increase in connection of renewable generators to the grid would hugely increase these charges. Uncertainty surrounding these charges can increase bids into the RESS auctions. Fixed TLAF charges assigned post commissioning, and fixed nodal TUoS charges indexed for inflation would mitigate against the risk of uncertainty.

- **Merchant Tail Risk:** The RESS 2 T&Cs dictated that a RESS contract will end after 15 years, while the lifetime of many of these generators can extend beyond 25 years. This leaves investors fully exposed to the market with no support scheme for at least 10 years. This risk increases RESS bidding prices. Extending RESS contract length to 20 years or having a gradual erosion of support after 15 years would reduce the severity of the merchant tail risk decreasing the RESS clearing price in RESS 3/ORESS 1.

Question 9: What financial incentives are needed to incentivise commercial scale production?

- We would urge the Government to work with industry to drive strategic investment in our ports, skills capacity, and local enterprise to ensure offshore wind farms create jobs, support businesses at home and deliver long-term benefits for communities across this island.

- We have an enormous opportunity to build a whole new industry, support balanced regional development, create thousands of jobs, and drive sustainable growth across Ireland.

- For this to happen we recommend that the Government:

    - Designs an action plan to support the development of a strong domestic offshore renewable energy industry.
    - Directs strategic investment into Irish ports to ensure that they are ready to support the construction of offshore wind farms.

- Addresses the growing skills gap by establishing a High-Level Implementation Group to deliver the recommendations set out in the Skills for Zero Carbon report.

- Support is needed for ports around Ireland to ensure they are ready for the opportunities that will come in developing offshore wind.

- Policy certainty around offshore is critical. The European Union has an Offshore Wind target of 300 GW by 2050. Recently, the NSEC countries set out a target for the Northern Seas of 260 GW of offshore wind by 2050. Offshore wind development across European countries and around the world is competing for a limited supply chain and there will be competition for contractors, vessels, etc. If Ireland is to deliver on 2030, certainty must be provided to the international supply chain as a matter of urgency.

Question 11: What are the regulatory challenges for reaching the renewable energy share targets?

- **CEP**: Implementation of the CEP Articles 12 & 13 and the uncertainty driven by the recent SEMC decisions on this matter.

- **CPPAs:** The landscape for CPPAs and how we can better incentivise them as a route to market for renewable generators.

- **RESS/ORESS:** The design of RESS / ORESS and how greater certainty can be provided to prospective bidders, leading to lower prices for consumers.

- **Longer-term market design:** Visibility on the longer-term market design as we approach 100% renewable electricity,

- **Firm Access:** There remains uncertainty around decision timeframes for a new Firm Access policy. This is a policy that is crucial for minimising additional costs to end consumers ahead of ORESS1 and RESS3 and ensuring investor confidence.

- **Certainty on future ECP batches:** ECP has been a positive development that provides certainty on connection opportunities for project developers and facilitates the connection of vital renewable and other system support technologies. CRU should confirm the continuation of annual ECP-2 batches beyond ECP 2.3 and provide clarity for future renewable projects that there is a viable route to connect to the system and remove any risk of a hiatus in connection offer processing.

- **Hybrid Connections:** The facilitation of hybrid connections has been a clear policy objective for some time that has been included in the CAP in both 2019 and 2021. It important that progress is now accelerated to allow the benefits of hybrid connections to be realised and allow these connections to help in delivering the 2030 targets.

- **Storage:** Lack of an existing framework for storage: A coordinated strategy for energy storage is needed to ensure investment is supported through the various pillars of the market and that new energy storage technologies are fully integrated into the electricity system and market to unlock their full potential. This should bring together the relevant stakeholders such as the System Operators, Regulatory Authorities, Government departments and industry to ensure a coordinated approach to energy storage going forward.

- **Offshore Cliff-Edge:** Fundamental to the development of Ireland's offshore wind sector is clarity on frameworks beyond the 2030 target date, something that is currently lacking. This brings additional risk into the Phase Two process, particularly given some of the proposals included in the consultation document, notably the cliff-edge for projects who fail to secure a route-to-market before 2030. Urgent clarity must be provided on the post-2030 enduring regimes as regards consenting and centralised grid planning, with visibility to the industry on longer term Offshore wind development plans.

- **Resourcing**: Resourcing is and will continue to be a crucial deciding factor around whether or not we deliver on our 2030 ambition. Additional resources and expertise are urgently needed in ABP to ensure a robust and fair planning system, in the NPWS to ensure projects are developed in a sustainable way and in bodies like EirGrid, ESB Networks and the CRU to ensure the electricity system continues to operate safely and securely.

Non-Electricity Questions

Sectoral Emissions Ceilings

Question 1: What do you view as the key actions required to ensure the emission reduction targets set out in the Sectoral Emission Ceilings are met?

- To further reduce emissions on our pathway towards delivering our 2030 ambition for the power sector, solutions must be implemented to rapidly phase out these carbon intensive fossil fuels in the first half of this upcoming decade. Deployment of technologies able to provide zero-carbon system-services, development of the transmission network, and the delivery of constraint management solutions must keep pace with renewables. According to WEI's Bridging the Gap report, analysis suggests that 66 million tonnes of CO_2 between 2021 and 2030 represents the minimum achievable for the Irish power sector under current policies. Major and fast interventions are required to move the dial past this figure, including solutions to phase out the usage of these carbon intensive fuels, and an acceleration of renewables and enabling technologies above and beyond existing policy. Key actions required will include the following:

    - **Statutory Decision Periods:** That statutory objective periods for both appeal cases and SID applications should become statutory decision periods to remove the uncertainty around timeframes and provide developers with greater clarity on timeframes in advance of our 2030 targets.

- **Adequate Resourcing:** Renewable energy applications need to move through the planning process as efficiently and expeditiously as possible. Sufficient expertise and resources are required for planning bodies if we are to meet our obligations under the Aarhus Convention, the Habitats Directive and EU law and emission reduction targets. Increased allocation of resources to planning bodies (NPWS etc.) and ABP will help in clearing the backlog of appeal and SID applications currently with ABP for decision is therefore even more necessary, particularly having regard to the impeding 2030 targets for both onshore and offshore wind energy and to avoid the delays experienced to date in the planning process.

- **Judicial Review:** We believe it is possible to have a planning and legal system which protects the rights of individuals, groups and communities to challenge decisions in the courts and at the same time, to have a system which strikes the right balance with the need to develop renewable energy and to discourage those who would use the courts to delay climate action. This is not just possible, but essential if we are to have a system in which all parties can have confidence.

- **SID Consenting Process**: The SID process should be a very clear and straightforward process which can be completed within an efficient timeline.

- **Repowering & Lifetime Extensions**: Repowering and lifetime extension of projects are vital if we are to reach the renewable energy targets set out in the Governments' CAP.

Question 2: What do you view as the main challenges/obstacles to the Sectoral Emission Ceilings being met?

Please refer to our answer to question 1.

Carbon Pricing and Cross-Cutting Issues

Question 1: Are there any unintended barriers within the planning system that should be addressed at national policy level in order to deliver our climate ambitions?

We would highlight the urgent need for the Government to focus actions and deliverables, and timelines that they can be held to. We note the following barriers within the planning system and would welcome if these are addressed at national policy level, at the earliest opportunity, in order to deliver our climate ambitions.

- Long Planning Decision timeframes
- Under-resourcing in ABP and the Planning Department
- Inadequate levels of expertise within ABP to deal with renewable electricity projects
- JR's and the delays which these are causing to renewable energy projects
- Translating national renewable onshore wind targets into regional targets and developing associated Spatial Strategies to ensure their delivery.