

DECC Review of Security of Supply

October 2022

DECC Review of the Security of Energy Supply

Department of the Environment, Climate and Communications

Irish Solar Energy Association response

Executive Summary:

The Irish Solar Energy Association (ISEA) was established in 2013 to advance a policy and regulatory landscape promoting solar as a leading renewable energy technology that will decarbonise Ireland's electricity system and contribute to a successful and strong clean economy. As the trade association for the solar industry in Ireland, ISEA is responding on behalf of our membership of more than 200 parties currently active in the Irish solar market. ISEA welcomes the consultation on the security of energy supply and the opportunity to respond.

To guarantee Ireland's energy security and energy independence, policymakers must embrace the concept of renewable energy generation via several renewable technologies used in tandem with demand response services such as battery storage. It, therefore, concerns the solar industry that in this consultation decarbonisation and electrification of energy supplies are framed in terms of increased demand for gas at times of low wind. We would like to point out the value that solar energy can offer due to its generation profile being inversely correlated with wind energy in Ireland. As one of two eligible technologies for RESS and the most successful technology in RESS 2, we question why greater consideration was not given to the potential contribution of solar to the security of supply.

The consultation should give greater consideration to REPowerEU commitments and sectoral ceiling emission agreements given the gravity of these policy changes and that these factors set the context in which Ireland will manage its security of energy supply. The acknowledgement of REPowerEU and sectoral ceiling emissions agreements without evidence of their influencing the consultation proposals appears an oversight. These should shape Ireland's security of supply activities.

ISEA does welcome the Department's recognition of the necessity of a diverse portfolio of renewable energy technologies to reduce Ireland's import dependency. The Government's 2030 solar PV target of 5.5GW points to the scale of opportunity and meaningful contribution that the technology will make to Ireland's power requirements. Further action will be required to enable that objective. A move to allow direct-line renewable projects and reforms to Capital Acquisitions Tax would be welcome as this would enable developers to provide energy security and decarbonisation more rapidly and in a more cost-effective manner.

In terms of the National Energy Security Framework, the solar industry is keen to contribute to ensuring energy security and reduce the risk of energy poverty for residents of Ireland. To do this, we would propose several straightforward policy interventions. These include the provision of 100% grants for those on lower incomes or in energy poverty, a mass tender by the Department for the installation of solar panels on all social housing, and the reduction/removal of VAT on solar panels as per the recent decision of the European Council.

Unfortunately, electricity production from thermal assets has increased since 2019. The reasons cited include higher gas prices and higher electricity demand – but this does not reflect all the variables at play. The increased use of thermal assets has also occurred due to a lack of sufficient grid infrastructure & a lack of sufficient policy measures to facilitate the decarbonisation of electricity demand.

Equally, the increase in gas demand being mainly *“driven by the power generation sector due to significant projected growth in electricity demand and the anticipated closure of certain non-gas fired thermal generators”* is perhaps a misrepresentation of the potential of the Irish electricity system. At present, demand increases are being fulfilled by gas for a lack of connected renewable assets. There is not a shortage of projects, but the pipeline of projects is taking too long to come onstream. However, assuming policy interventions the renewables industry has requested are implemented this demand could be met by new renewables coming onto the system.

The Department’s technical analysis does not properly consider all the renewable energy sources that are available at utility scale in Ireland. The focus for ensuring the security of supply in Ireland should be on energy independence via indigenous renewables and supporting the necessary ecosystem of technologies to operate a low-carbon system including:

- Policy on storage
- Demand response policy
- Updated system service and market arrangements
- Future interconnection arrangements
- Consideration of the vectors of energy use that may be harder to electrify and implementing the measures to give them effect (e.g., district heating, renewable heat)

We welcome the Department’s intent to complete an annual assessment of electricity and gas in collaboration with EirGrid, ESB Networks, and Gas Networks Ireland. The focus of these reviews should be to achieve energy security by decarbonising the system. We also endorse the proposed measure to complete a technical analysis of Ireland’s energy security every two years.

It is a welcome step that the Department intends to carry out energy security reviews every four years. However, developments in the energy security space occur rapidly and without warning (as shown by the Russian invasion of Ukraine). The four-year review interval should therefore be kept under review - legislation and regulations must be fit for purpose to accommodate the energy system changes for decarbonisation.

Introduction:

The Irish Solar Energy Association (ISEA) was established in 2013 to advance a policy and regulatory landscape promoting solar as a leading renewable energy technology that will decarbonise Ireland's electricity system and contribute to a successful and strong clean economy. As the leading voice for the Irish solar industry, ISEA works closely with stakeholders to advance the solar agenda on behalf of our members. ISEA is committed to ensuring that solar provides at least 20% of electricity demand by 2030.

As the trade association for the solar industry in Ireland, ISEA is responding on behalf of our membership of over 200 parties currently active in the Irish solar market. We are grateful for the opportunity to respond to this crucial consultation and look forward to continuing to engage with the Department of Environment, Climate & Communications (DECC) on the role of renewables in ensuring the security of supply.

Solar has a major role in contributing to Ireland's clean energy transition and in providing energy security. In our response, we outline how this can be achieved. Firstly, we would urge the Department to include rooftop solar (both domestic and non-domestic) and utility-scale solar as part of its future technical analyses for energy security. As the most successful renewable energy technology in RESS 2 with a strong pipeline and further upcoming inward investment, it is crucial that the value of solar energy in decarbonising the Irish energy system and developing Ireland's energy independence is given due consideration.

Secondly, we encourage the Government to make several straightforward policy & regulatory interventions to ensure that solar energy can make the greatest possible contribution to Ireland's energy independence and energy security. These interventions include (but are not necessarily limited to) the introduction of regulations to allow direct line/private wire renewables, reforms to Capital Acquisitions Tax, upgrades to existing and construction of new grid infrastructure as well as reforms to planning regulations to enable expedited deployment of utility-scale solar projects.

Finally, the objective of this review should be to deliver energy security by way of decarbonisation via renewables. Therefore, any supply mitigation options that increase carbon emissions should not be considered by the Department.

These points are discussed in further detail in our response, but we would be happy to discuss the finer details of our proposals with the Department at a time of their choosing.

Issues For Consultation:

ISEA welcomes the consultation on the security of energy supply and the opportunity to respond. Aside from the specific consultation questions, we would like to elaborate more broadly on solar energy's potential in enabling the security of supply and comment on several assumptions made in the framing of the consultation.

Firstly, it is noted that the International Energy Agency (IEA) defines energy security as *"the uninterrupted availability of energy sources at an affordable price."* While this definition is correct, it implies that this can only be achieved through synchronous generation. To guarantee Ireland's energy security and energy independence, policymakers must embrace the concept of renewable energy generation used in tandem with demand-side response services such as battery storage.

Secondly, we support the Department's view that *"the supports provided to increase the levels of energy efficiency and uptake of solar PV for households increases security of supply for the residential sector."* Equally, 'energy import dependency' is identified by the Department as a widely used indicator of a given country's energy security. This is a useful variable to consider and as Ireland is one of the most import-dependent countries in the EU (with most of those imports being fossil fuels) we should aspire to reduce our import dependence. However, considering the need to decarbonise the global power system in the interest of reducing the effects of climate change, we would urge the Department to work with partners in Europe to maximise renewable targets and collaborate so that the electrons coming over interconnectors are zero carbon or as close as possible to that objective.

We welcome the Department's recognition of the necessity of a diverse portfolio of renewable energy technologies to reduce Ireland's import dependency: *"In order to reduce its import dependency, Ireland must increase the level of energy from a diverse number of renewable energy sources."* It concerns the solar industry however that the pursuit of decarbonisation and resulting increased electrification of energy supplies is framed in terms of increased demand for gas at times of low wind. We would like to point out the value that solar energy can offer due to its generation profile being inversely correlated with wind energy in Ireland.

Ireland's Electricity and Natural Gas Systems:

The consultation should give greater consideration to REPowerEU commitments and sectoral ceiling emission agreements given the gravity of these policy changes and that these factors set the context in which Ireland will manage its security of energy supply. The acknowledgement of REPowerEU and sectoral ceiling emissions agreements without evidence of their influencing the consultation proposals appears an oversight. These should shape Ireland's security of supply activities.

Ireland's Natural Gas Demand and Supply:

ISEA recognises that the Irish power system is in a period of transition from one based on thermal assets to one built around renewables. However, to make that transition in the timeline required under the Climate Action Plan requires the speedier deployment of projects.

We note the Department's statement that import dependency for natural gas has increased as a result of the reduction and closure of the Kinsale and Seven Heads gas fields and the gradual depletion of the Corrib gas field. In response, we would again like to emphasise the potential value of solar for reducing import dependency. This is particularly relevant in the context of the strong demand growth due to *"increasing power generation gas demand (driven by increasing electricity*

demand and other thermal plant closures) and increasing industrial and commercial sector gas demands.”

Energy users do not discriminate between generating technologies once their needs are met. Renewable projects that supply directly to large energy users via private wire connections would serve to meet a lot of the demand that is currently satisfied by gas while simultaneously decarbonising consumption.

Gas Networks Ireland forecast *“increases in the average and 1-in-50 peak day demands when there is limited wind generation available during cold winter peak day demand periods leading to a reliance on thermal generation, especially gas-fired generation.”* These analyses need to have due regard to the potential contribution of solar in the context of that inverse correlation.

Ireland’s Electricity Demand and Supply:

ISEA welcomes the progress of electrification of energy demand in Ireland between 2005 and 2020 and the increased share of renewables within that frame – which is particularly impressive in the context of increases in overall electricity demand.

It is however unfortunate that electricity production from thermal assets has increased since 2019. We note the reasons cited include higher gas prices and higher electricity demand – but this does not reflect all the variables at play. The increased use of thermal assets has also occurred due to a lack of sufficient grid infrastructure & a lack of sufficient policy measures to facilitate the decarbonisation of electricity demand. Straightforward policy changes to enable this include a more permissive ruleset for private wire connections and reforms to Capital Acquisitions Tax to enable landowners to enter larger land leases for solar projects.

We welcome the Department’s acknowledgement of Climate Action Plan 2021’s expected drivers of change as part of wider policy conversations around energy security. The solar industry has identified several interventions which would reduce the impact of increased demand. For example, electrification of transport could be made more affordable for consumers (while reducing emissions) by increased uptake in residential and non-domestic solar PV.

Irish Electricity System:

The suggestion that Ireland has an *“extensive transmission network”* belies the fact that major upgrades to existing infrastructure need to be completed and new grid infrastructure needs to be constructed to ensure that a sufficient amount of renewable assets can be installed on the Irish energy system to guarantee Ireland’s energy independence and security.

ISEA would also have concerns about the Department’s characterisation of renewables as *“intermittent”* and requiring a *“complementary flexible source of power such as conventional generation, batteries, demand side response, interconnection, or other solutions to back them up and ensure that the electricity system remains in operation and stable even when these sources of energy are not available.”*

While many renewable technologies are intermittent in nature, the Department appears to have missed that wind and solar have complementary generation profiles. Demand response gaps can be mitigated through the effective utilisation of utility-scale battery storage. Renewables do not require support from conventional generation when they are deployed on the system in this configuration – however, we welcome demand-side response & interconnection solutions. To guarantee Ireland’s

energy security, reduce our import dependency and our emissions profile, we must cease conventional generation.

Policy Context:

The policy context for energy security & climate policy includes several dimensions. While the solar industry is pleased to note a positive level of policy & political support for its objectives both in Ireland and in Europe, we are of the view that further action is needed at the policy level to enable the solar industry to deliver on the Government's 5.5GW target by 2030. A move to allow direct-line renewable projects and reforms to Capital Acquisitions Tax as regards solar farms would be welcomed by the industry as it would enable developers to deliver energy security and decarbonisation more rapidly and in a more cost-effective manner.

In previous discussions with the Department, we have welcomed the Government's recognition of the climate crisis via the Climate Action Plan. The objectives cited in the consultation document are broadly in line with ISEA's view of the necessary measures for creating energy security via decarbonisation. However, considering the current thermal asset price crises as a result of geopolitical tensions and the economic risks of depending on a finite resource that creates further emissions, we do not feel that installing "*circa 2GW of new flexible gas-fired power stations*" onto the national grid is an effective use of available resources, even if this is intended to support a high variable renewable electricity system.

ISEA broadly supports the Government's efforts to transition to a circular economy as a means of combatting climate change. We believe solar can play an important role in this economic transition as shown in our attached *Ireland's Solar Future* report. The potential scale of the Irish solar industry is presented in the report as the gap between a set of barriers that are constraining growth through and sets of enablers mitigating the effect of those barriers. These categories are networks, planning, routes to market, and domestic and non-domestic customer participation.

Equally, we are broadly supportive of the Government's Policy Statement on Security of Electricity Supply – subject to a few reservations. Firstly, ensuring that "*security of electricity supply is maintained throughout the transition to the target of up-to 80% of electricity consumption from renewable sources to ensure that consumers do not lose confidence in the transition*" is a legitimate concern – but this cannot be used as an excuse to slow down the deployment of renewable assets and retain thermal assets on the energy system. To do so poses a continuing threat to Ireland's security of supply. Secondly, all efforts by the Government to ensure that sufficient investments are made in the energy system to support the clean energy transition to ensure the security of supply are welcomed by the solar industry, but we would again emphasise that the introduction of "*additional flexible conventional electricity generation*" would be counterproductive for Ireland's decarbonisation & energy security journey.

In terms of the National Energy Security Framework, the solar industry is keen to contribute to ensuring energy security and reducing the risk of energy poverty for residents of Ireland. To do this, we would propose several straightforward policy interventions. Firstly, solar PV grants should be expanded and restructured to maximise their positive effects on vulnerable consumers.

Secondly, energy price increases are disproportionately affecting lower-income households, and energy poverty is becoming a reality for a growing number of people as they must spend a greater proportion of their income on fuel. Solar PV grants that cover 100% of the total installation costs of solar panels should therefore be made available to those on lower incomes and those affected by

energy poverty. Higher discounts on installing solar PV panels on their homes to generate renewable electricity should also be considered.

Thirdly, many energy users in social housing are unable to become renewable self-consumers of their own volition due to a combination of lacking the required control over their accommodation as well as potentially lacking the financial means to do so. To assist energy users in this situation, we would urge the Department to put out a mass tender for the installation of solar panels on all social housing to enable cost of living reductions and increase the available disposable income for financially vulnerable citizens.

Finally, the European Council recently announced an extension to the list of goods and services that can benefit from reduced or removed VAT rates to include solar panels installed on private homes and public buildings. The VAT on household solar photovoltaic (PV) installations should be eliminated or significantly reduced to encourage more householders to start generating their own green energy to reduce the effects of upcoming energy price rises on households at risk of or in energy poverty.

We welcome the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy. However, the lack of action to date on direct-line renewables is a major concern for the solar industry in this policy area. Private wire/direct line systems provide an alternative to renewable energy projects connecting to the grid and then supplying to energy users. By enacting legislation to enable private wires, the Government of Ireland can help to facilitate large energy users that face difficulties in meeting their own demand and accessing the network. In effect, private wire/direct line networks provide quicker routes for users to connect to renewable sources of energy. As grid connection costs do not apply for direct line/private wire projects, the cost of procuring electricity is reduced considerably for users. Consequently, direct lines encourage foreign direct investment through energy cost reductions via simplified connection processes.

As future growth in demand will largely be due to an increase in the number of large energy users who are already struggling to access the Irish electricity network and meet demand, delivery on the private wire issue is therefore crucial for Ireland to meet its climate targets to increase the proportion of renewable electricity to up to 80% by 2030. It should also be noted that Ireland is required to make legislative provisions for private wire networks under the terms of the EU Renewable Energy Directive. To enable direct line/private wire projects the restriction set out in section 37(1A) of the Electricity Regulation Act 1999 needs to be repealed.

The Department of Environment, Climate & Communications (DECC) could easily set parameters (in consultation with other stakeholders) for circumstances in which direct lines are permitted that align with overarching Government of Ireland policy objectives such as reducing emissions, facilitating security of supply, and encouraging foreign direct investment.

Climate and Energy Targets:

ISEA supports the government's Climate and Energy Targets and believes that solar is vital for achieving them. Within this frame, the approach of 'Sectoral Emissions Ceilings' is appropriate, but we would also like to propose several sector-specific interventions via solar to make these targets more achievable:

- Electricity: 75% Reduction by 2030
 - Construction of new electricity grid infrastructure to enable expedited deployment of utility-scale solar.
 - Upgrade of existing electricity grid infrastructure to enable expedited deployment of utility-scale solar.

- Buildings (Commercial & Public): 45% Reduction by 2030
 - Removal of solar safeguarding zones for non-domestic solar.
 - Reduction of VAT on solar panels as per EU directives.

- Buildings (Residential): 40% Reduction by 2030
 - Removal of solar safeguarding zones.
 - Solar PV grants that cover 100% of installation costs should be made available to those on lower incomes and those affected by energy poverty.
 - The Department should put out a mass tender for the installation of solar panels on all social housing.
 - VAT on household solar photovoltaic (PV) installations should be eliminated or significantly reduced.

- Industry: 35% Reduction by 2030
 - Direct Lines/Private Wires

- Agriculture: 25% Reduction by 2030
 - Capital Acquisitions Tax reform.

Technical Analysis:

The consultation document states that CEPA has used Gas Network Ireland's 2020 Network Development Plan's Low Demand Scenario for its modelling. Considering the move towards electrification of energy, heat, and transport (albeit via renewables), it is unrealistic to use GNI's Low Demand scenario as this incorporates EirGrid's low electricity demand scenario.

Equally, the increase in gas demand being mainly *"driven by the power generation sector due to significant projected growth in electricity demand and the anticipated closure of certain non-gas fired thermal generators"* is perhaps a misrepresentation of the potential of the Irish electricity system. At present, demand increases are being fulfilled by gas for lack of renewable assets to meet this demand. However, assuming policy interventions the renewables industry has requested are implemented as soon as possible most of this demand could be met by new renewables coming onto the system.

ISEA welcomes the recognition of the importance of the 'worst case scenario' of *"demand increases above and beyond what was considered in CEPA's technical analysis"* in future energy system planning. However, this risk can be reduced considerably if sufficient renewable generation capacity is installed on the electricity system within a sufficient timeframe.

Consultation Questions:

Risks:

Question 1: Are there any other security of supply risks that you can identify in addition to those set out in Section 6?

In addition to the points raised under the Technical Analysis in Section 6, the rate of deployment of renewables and the quality of forecasting in terms of quantifying the contribution of solar for the clean energy transition are identifiable security of supply risks.

Question 2: If there are other risks that you have identified, could you outline some mitigation options to address the risk(s)?

Several measures can be taken to expedite the deployment of solar. Firstly, planning permission regulations should be updated to allow a more permissive ruleset by which solar projects can be delivered.

Secondly, critical grid infrastructure needs to be upgraded and constructed across the island so that solar projects can be installed in more areas to increase overall solar generation - thereby compensating for low solar generation in certain areas of the country with higher amounts of solar generation in other areas.

Thirdly, hybrid connections should be included as part of the RESS 3 Terms & Conditions to enable the co-location of renewable assets such as solar and battery storage – thereby reducing the impact of low solar availability at times of high demand.

To ensure solar's contribution to the clean energy transition is accurately measured, the following metrics should be included in the Department's future technical analysis:

- Average solar strike price in RESS.
- PSO support cost of solar.
- Percentage of Ireland's energy demand satisfied by solar.
- Progress of 5.5GW solar target.

Question 3: Are the five shock scenarios that were considered, and the additional scenarios related to the Russian invasion of Ukraine, sufficiently broad?

In our view, the demand and supply side risks cited by the Department in the consultation document were sufficiently broad to consider the risks to energy security. Several comparatively straightforward policy interventions could be made to reduce the impact of such shock scenarios such as the increased deployment of rooftop solar and changes to the Electricity Regulation Act to permit direct-line renewables. We endorse the Government of Ireland and the European Union's decision to phase out its dependency on Russian energy imports as soon as possible.

Mitigation Options:

Question 4: Do you have any additional mitigation options that you think should be considered?

The construction of new grid infrastructure and upgrades to existing grid infrastructure should be considered, but the renewables industry can maximise current its generation and storage capacity on the network through the use of hybrid connections. This would allow multiple renewable generators to be co-located on the same site, thereby helping to mitigate demand/supply imbalances. Making more efficient use of the network is crucial for maximising Ireland's enduring security of supply.

Question 5: Which gas supply mitigation options, if any, should be considered for implementation?

No response.

Question 6: Which electricity supply mitigation options, if any, should be considered for implementation?

No response.

Question 7: What measures should be considered on the demand side to support security of supply of electricity and gas?

The focus for ensuring the security of supply in Ireland should be on energy independence via the deployment of indigenous renewables. However, additional measures should be taken to ensure the security of supply while projects in the Irish renewables pipeline move through their various stages of development. The measures that should be considered to support the security of supply include the introduction of a storage policy framework and additional electricity interconnections.

Question 8: Do you have any views on how the mitigation options should be implemented?

No response.

Policy Measures:

Question 9: Do you support the policy measures proposed in section 8 of the consultation paper?

We welcome the Department's intent to complete an annual assessment of electricity and gas in collaboration with EirGrid, ESB Networks, and Gas Networks Ireland. However, we would stress that the focus of these reviews should be to achieve energy security by decarbonising the system via renewable generation.

We also endorse the proposed measure to complete a technical analysis of Ireland's energy security every two years under the proposed headings. Within this frame, we would suggest that the contribution of solar to the security of supply is more fully captured. For example, the following data points could be considered:

(i) Compile and report on energy security statistics

- Import dependency of Ireland's electricity system compared with other EU member states.
- Average total strike prices of RESS auction & strike prices per technology.
- PSO supports for each renewable technology.

(ii) Assess Ireland's energy security against key indicators

- Percentage of Ireland's energy demand satisfied by renewable technologies.

(iii) Report on implementation of policies and measures arising from the Department's formal reviews

- Progress of renewable energy targets e.g., 5.5GW of solar before 2030.

(iv) Report on international developments on energy security

- Supply chain issues for energy projects e.g., solar panels, inverters, and transformers, etc.
- EU Directives & Regulations in the energy security policy area.
- All relevant global geopolitical developments in the energy security policy area.

(v) Set out relevant technology developments

- Improvements in renewable technology components e.g., panels.
- Improvements in and implementation of new grid technologies.

It is also a welcome step that the Department intends to carry out energy security reviews every four years. However, we would stress that developments in the energy security space occur rapidly and (as shown by the Russian invasion of Ukraine) without warning. The four-year interval should therefore be kept under review - legislation and regulations must be fit for purpose to accommodate the energy system changes for decarbonisation. On another note, ISEA views UK-Ireland cooperation within the frame of the EU-UK relationship on energy security as positive overall.

Question 10: What further tools and measures do you think would contribute the most to Ireland's energy security of supply?

The following measures should be implemented to make the largest possible contribution to Ireland's security of energy supply:

Non-Domestic:

- Direct lines/Private Wires: More permissive ruleset to enable large to satisfy their demand via utility-scale renewables.
- Capital Acquisitions Tax: Removal of Capital Acquisitions Tax thresholds on land leases to enable solar developers to work with a larger number of landowners to develop utility-scale solar projects.
- Construction of new & upgrades of electricity grid infrastructure.
- Reform of planning regulations to enable expedited deployment of utility-scale solar projects.

Domestic:

- Solar PV grants should be expanded and restructured to maximise their positive effects on vulnerable consumers.
- Solar PV grants that cover 100% of the total installation costs of solar panels should therefore be made available to those on lower incomes and those affected by energy poverty.
- The Department should put out a mass tender for the installation of solar panels on all social housing.
- The European Council recently announced an extension to the list of goods and services that can benefit from reduced or removed VAT rates to include solar panels installed on private homes and public buildings. The VAT on household solar photovoltaic (PV) installations should be eliminated or significantly reduced.

Conclusion:

ISEA welcomes the Department's consultation on the Security of Energy Supply. We would welcome the opportunity to discuss the analysis underpinning our submission and the contents of same. In conclusion, we would like to emphasise the following key points:

Risks:

- The rate of deployment of renewables and the quality of forecasting in terms of quantifying the contribution of solar for the clean energy transition are identifiable security of supply risks.
- To expedite the deployment of solar, planning permission regulations should be updated, critical grid infrastructure needs to be upgraded and constructed and hybrid connections should be included as part of RESS 3.

Mitigation Options:

- New grid infrastructure should be constructed and upgrades to existing grid infrastructure should be made, but the renewables industry can maximise its current generation and storage capacity on the network through hybrid connections.
- This would allow multiple renewable generators to be co-located on the same site, thereby helping to mitigate demand/supply imbalances.
- Making more efficient use of the network is crucial for maximising Ireland's enduring security of supply.

Policy Measures:

- The focus of the Department's annual assessment of electricity and gas should be to achieve energy security by decarbonising the system via renewable generation.
- It is also a welcome step that the Department intends to carry out energy security reviews every four years.
- We would stress that developments in the energy security space occur rapidly and without warning (as shown by the Russian invasion of Ukraine).
- The four-year review interval should therefore be kept under review - legislation and regulations must be fit for purpose to accommodate the energy system changes for decarbonisation.