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Response to Department of the Environment, Climate and Communications Consultation

Draft South Coast Designated Maritime Area Plan (SC-DMAP)

Electricity Association of Ireland

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A decarbonised future powered by electricity.

Electricity Association of Ireland

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The Electricity Association of Ireland (EAI) is the representative body for the electricity industry and gas retail sector operating within the Single Electricity Market (SEM) on the island of Ireland.

Our membership comprises utilities that represent 90% of generation and retail business activities and 100% of distribution within the market. Our members range in size from single plant operators and independent suppliers to international power utilities. Our members have a significant presence in Ireland, Northern Ireland and Great Britain across the sector value chain. We represent the interests of the all-island market in all relevant jurisdictions, including the EU via our membership of the European electricity representative body Eurelectric.

We believe that electricity has a fundamental role in providing energy services in a decarbonised, sustainable future, in particular through the progressive electrification of transport and heating. We believe that this can be achieved, in the overall interest of society, through competitive markets that foster investment and innovation.

We promote this vision through constructive engagement with key policy, regulatory, technology and academic stakeholders both at domestic and EU levels.

Our ambition is to contribute to the realisation of a net-zero GHG emissions economy by 2050 or sooner, in order to limit the impact of rising temperatures. Electricity offers opportunities to decarbonise the Irish economy in a cost-effective manner.



Introduction

The Electricity Association of Ireland (EAI) welcomes the opportunity to respond to the draft South Coast DMAP. Since Ireland's first Climate Action Plan in 2019, there has been commendable progress in the offshore renewable energy (ORE) policy space. This includes the introduction of new consenting legislation through the Maritime Area Planning (MAP) Act and the first Offshore RESS auction in 2023. Phase 1 projects are now preparing to submit planning applications to An Bord Pleanála later this year, another important milestone.

Having considered this draft, the EAI wishes to communicate that clarity of direction as to how, where and when state-led infrastructure (including grid and port facilities) will be constructed is critical to the delivery of ORE projects. In the absence of such clarity, ORE developers are exposed to significant risk of projects being deemed unviable as a result of a change of approach as to how state-led infrastructure is delivered.

Similarly, survey data is fundamental to the expedited delivery of ORE projects. We welcome the move to create a GIS repository however, we caution that ORE developers need greater clarity on the quantity and quality of data that will be available to them. Failure to do so will result in delays which will be more likely years rather than months.

In this response, the EAI will focus on the following areas:

- Grid Development
- Data Availability
- The Community Benefit Fund

Grid Development

As outlined in the introduction, clarity on grid development is critical to the delivery of ORE projects. While this DMAP is another step in Ireland's aim to develop the ORE industry, there is a clear lack of detail as to how, when and where state-led infrastructure (especially grid infrastructure) will be constructed. ORE developers require certainty and clarity of direction in order to plan projects in advance of auctions and avert the risk of projects being deemed unviable in the event that grid infrastructure is later developed in a way that was not anticipated.

In addition, to the above concerns surrounding grid development, this draft DMAP does not provide clarity as to the role of non-grid developments in the outlined areas. Government ambition seeks to see 2GW of non-grid limited offshore wind capacity to be in progress by 2030. With these targets fast approaching, now is the time to be providing clarity as to what role this DMAP can play in delivering this target.

The EAI welcomes that transmission infrastructure development will be one of the aspects considered by the proposed technical working group. We reiterate the importance of industry participation and involvement in such groups as developers are best placed to advise on grid

development. It will also be an opportunity to proactively inform industry of the progress in infrastructure development.

While the DMAP provides detail as to how site A will be connected, there is no detail as to how sites B, C and D will be connected to the grid. Getting the transmission system right will be critical to unlocking the potential of all four sites and we therefore seek that industry be well informed of grid developments and informed prior to the running of competitive auctions.

Data Availability

Experience from EAI members suggests that it typically takes three years to carry out the geophysical and geotechnical surveys, metocean, and aerial surveys necessary for an ORE development (including procurement, deployment and data analysis). Therefore, there is an urgent need to ensure that all relevant data collated by the Department for this DMAP be available to stakeholders.

The draft DMAP refers to a GIS repository which state and other bodies can input their survey data for others to use. The EAI welcomes this development but cautions the need for state-led data to be accessible to all potential developers. Similarly, if developers are being asked to input into this repository there must be protections in place to safeguard data which may be of commercial interest for developers.

There remains uncertainty surrounding the standard of the data set to be provided to ORE developers meaning that any issues arising in the data must be addressed and dealt with by the developer. As outlined above, this may ultimately mean that developers will need to carry out their own assessment meeting their own standards placing significant pressure on delivery timelines, likely to be years rather than months.

Community Benefit Fund

While industry welcomes a Community Benefit Fund, we understand that the current proposal is to include the fund within the MAC and not the ORESS 2.1 Terms and Conditions. We do not believe that this is appropriate due to the lack of consistency when compared with ORESS 1. It does not create a level playing field. The inclusion within the MAC creates a number of issues most notably the reality that there will be a lack of competitiveness between ORESS 2.1 projects and ORESS 1 project(s) during the post support period. Also, the inclusion of the Community Benefit Fund for the ORESS 2.1 project and not ORESS 1 projects will create considerable friction between coastal communities due to the discrepancies between the CBF terms, with some communities benefiting considerably more than others. We suggest it is more appropriate that the Community Benefit Fund period aligns with the CfD term.