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By e-mail to: info@eirgrid.com

Date: 26th November 2021

**RE: TSO PR5 Investment Planning & Delivery Multi-Year Balanced Scorecard
2022-2026**

Dear EirGrid,

Prior to setting out our response to this consultation we wish to note to you that the Coillte Renewable Energy business unit (Coillte RE) is in the late stages of transitioning to a new stand-alone joint venture company, in conjunction with the ESB.

Over the past decade Coillte RE has amassed a significant track-record in the renewable energy arena¹. Furthermore, we believe that Coillte RE can make a very significant contribution to enabling Ireland attain its national low carbon transition objective. As Ireland continues to reshape its energy generation fleet and electrifies its economy (heating and transport sectors) in line with enunciated energy and environmental policy objectives, demand for c. 4 GW of new onshore wind facilities in Ireland is expected in the decade to 2030.

Coillte RE recognises the Government's ambition set out in the Climate Action Plan and seeks to contribute up to 1 GW of new onshore wind capacity in Ireland in the period up to 2030. By leveraging a unique land bank, which presents an unmatched portfolio of large high wind sites, this target can be achieved.

¹ Specifically in onshore wind, through the development and construction of four wind farms totalling 230MW under the REFIT 2 regime representing a total investment of over €400m between 2010-2017. These projects were delivered on a 50% ownership basis in conjunction with third-party partners.

We welcome the opportunity to engage with EirGrid and provide feedback on the TSO PR5 Investment Planning & Delivery Multi-Year Balanced Scorecard 2022-2026. Our team also reviewed the Wind Energy Ireland consultation response and we wish to support and endorse the positions set out in their submission, including:

1. The scorecard metrics would benefit from calling out the specific projects that are included in the EirGrid TDP and SOEF Roadmap and having specific targets for these in the relevant years that the TSO could then be assessed against achieving.
2. There should be a higher number of projects included in Steps 1-3 scorecard metrics over the 2022-2024 period to reflect the c. 44 candidate projects that have been identified in SOEF for delivery by 2030. The weightings for the Step 1-3 metrics should be increased given the importance of these projects being progressed as soon as possible to achieve Climate Action Plan targets. These steps are as important as delivery in steps 4-6. The number of candidate projects may also need to be added to when EirGrid completes studies to assess requirements for 80% RES-E by 2030.
3. There should be an incentive that rewards decision making that looks at system adequacy to meet the needs and targets identified in Ireland's Climate Action Plan. The TSO should be required to demonstrate that they have sufficient projects on a scheduled glide-path to delivery, to be capable of realistically meeting the needs of the system for 2030, including a total of 8.2GW of onshore wind, with sufficient future proofing to provide capacity for an onshore wind pipeline that is well placed to deliver for targets to 2030 and beyond. New circuits, such as 110kV and 220kV cables should be installed so that they can be readily 'voltage uprated' if needed in future. New transmission stations, especially if they use gas insulated switchgear, should have sufficient space for future expansion for new connections for renewable generation, storage and system reinforcements.

The TSO should be incentivised to incorporate the timelines for deploying various technical solutions and factor that into decision making around the "best technology" to meet the system need. It is fully plausible that in some circumstances, a cheaper network capex solution with slower deployment timelines, might have greater consumer cost impacts than a higher capex solution that could be deployed more quickly onto the system, i.e. the consumer cost impacts could be through higher dispatch balancing costs or higher constraint assumptions being factored into RESS auction bids. A balanced scorecard assessment should consider all of these points under an assessment heading of "Overall Adequacy of Development Activity".

We would be very happy to engage with you further on any matter set out in the above relating to this important consultation.

Yours sincerely,

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