

Bord na Móna

TSO PR5 RES-E Multi-Year Plan 2022 – 2026

Consultation Response

3 December 2021



1. Introduction

Bord na Móna (BnM) is evolving to deliver essential climate solutions for Ireland. Having ceased peat harvesting, our focus is on developing Climate Solutions in renewable energy, sustainable waste management, carbon storage and biodiversity conservation.

BnM has a long history of contributing to Ireland's energy demand and we are actively considering development options that respond to energy needs of the Irish system while supporting the low carbon transition. We currently have over 500MW of generation assets under management and we are actively progressing large scale renewable projects totalling 1.5GW across our landbank. At BnM we are taking real and tangible action by building and managing large scale renewable energy infrastructure to deliver clean power for the national grid.

BnM welcomes the publication of the TSO PR5 RES-E multi-year plan¹ for comment. The national ambition for decarbonisation will only be achieved through a collaborative approach between the SOs, market participants, policy makers and increasingly with customer participation. As a leading developer of onshore wind and complementary technologies in Ireland, BnM is keen to play a leading role in contributing to the delivery of Ireland's 80%² renewable electricity target. The remainder of this paper sets out our views on the key areas in the EirGrid RES-E plan.

2. Response

It is noted in the paper that "It is currently expected that the significant growth in electricity from Renewable Energy Schemes (RES) will derive from offshore and onshore wind, solar and new technologies. This large growth of these technology types will be coupled with the phasing out of coal, oil and peat". This ambition, in combination with an annual target to increase RES-E by 3% year on year to 2025 will require more timely 'wins' from Wind, Solar and New technology, as well as Biomass electricity, substituting for Peat (the latter notably contributing valuable Inertia from Renewables).

While BnM welcome this enhanced renewable ambition, we would highlight that the plans to

¹ TSO PR5 RES-E Multi-Year Plan. <https://www.eirgridgroup.com/site-files/library/EirGrid/PR5-RES-E-Incentive-Multi-Year-Plan-Consultation-Paper.pdf>

² The Consultation Paper is predicated on reaching the target 70% RES-E by 2030; this target has been superseded to an increased ambition level of 80% RES-E by 2030

realise such targets would benefit from factoring the considerably shorter timeframes within which onshore wind³ can be built vis a vis offshore wind – mindful of the short period to 2030. BnM has an ambitious pipeline of large-scale onshore projects utilising our landbank in areas where there is a legacy of industrial activity and power generation. While it is clear that offshore wind is expected to meet the greatest portion of the additional renewable generation to meet the increased target as set out in EirGrid’s inaugural “Shaping Our Electricity Future Roadmap”⁴, it is clear that, in the short term onshore wind is best placed to meet EirGrid’s annual RES-E target.

We note EirGrid’s commitment to progressing 10 separate workstreams identified with specific outputs for 2022 – 2024. While these areas are relevant, and in collaboration with the others will underpin achieving the RES-E target, BnM’s view is that prioritising some features of the workstreams for delivery above others would be fruitful. There is a risk that overly focussing on the timelines and measurability towards the achievement of each workstream may inhibit the system operators to realise greater system benefits sooner, by identifying the most difficult workstreams which are key enablers for the others. Among these we would highlight two in particular:

1. Efficient delivery of the DS3 programme, SNSP

We note that the TSO and DSO intend to work more collaboratively over the next decade in line with the Joint DSO/TSO work programme published for consultation in October 2021. The efficient delivery of the DS3 programme across the both the Transmission and Distribution systems is imperative to enable the achievement of SNSP targets out to 2030, enabling higher renewable penetration on the system.

2. Maximising grid capability

There is no lack of ambition from developers to deliver new capacity, install innovative technologies or to adopt more flexible operational approaches to making better use of the Grid. We welcome the work focused on Nodal Control and see it as an approach that can deliver a local solution to a local problem. Enabling hybrid connections, accompanied by more effective

³ EirGrid, 2021, Shaping Our Electricity Future. https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping_Our_Electricity_Future_Roadmap.pdf

⁴ IBID.

utilisation of MEC can also unlock the value of the existing grid in a timely manner. Further benefits can accrue by incentivising/enabling the types of grid forming technologies which are already used successfully in other jurisdictions. While this implicitly recognises the challenges in rolling out country wide grid reinforcement and looks to mitigate the impact this has, BnM would urge EirGrid to ensure that these projects can access the grid on a firm basis to maximise RES-E and the value of investments by the customer through PR5.

In particular, we see significant potential in the Midlands where BnM has a significant development pipeline and we are actively progressing large scale renewable projects totalling 1.5GW across our landbank. We are also aware of several other developers progressing in the Midlands and facilitating investment in this region in a timely manner is important.

3. Conclusion

As a developer and operator of generation assets in Ireland, BnM is acutely aware of the importance of this workplan being delivered. Each stream of the workplan areas is important and, in some cases, highly interdependent on others. Where a target is likely to be delayed, or missed, this should be flagged to the industry as well as the CRU. If there are mitigation measures that could keep a work item on track these should be implemented.

Adopting an open and transparent approach to managing the delivery of these workstreams should lead to a more constructive outcome for all market participants. A collaborative approach between industry, the system operators and the CRU will be necessary to achieve success in the energy sector and BnM is keen to play its part by continuing to deliver climate solutions. BnM will endeavour to work with constructively with the TSO over the next decade to support Ireland to realise its' decarbonisation ambition.