



Capital Project 966
Engagement Report Step 2

25 March 2019



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Author(s)	LaShanda Seaman, Louis Horsley
Quality Assurance by	Killian Condell
Main point of contact	LaShanda Seaman
Telephone	07701 326651
Email	lashanda.seaman@traverse.ltd

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t. 0207 239 7800 p. 252b Gray's Inn Road, London WC1X 8XG
e. info@traverse.ltd w. www.traverse.ltd





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1. Introduction

1.1. The EirGrid Development Process

EirGrid understands that the complexity of electricity transmission projects benefit from use of a consistent planning process to allow informed decision-making to take place. Each project therefore progresses through the same six-step process, providing an opportunity for engagement and evaluation to be carried out at regular intervals.

This process, named *Have Your Say*, is made up of the following six steps:

- 1) Is there an issue that may need grid development?
- 2) What technical solutions can meet the needs of this project?
- 3) Which is the best choice of technology and what route could it take?
- 4) Where exactly should we build it?
- 5) The planning process
- 6) Construction, energisation, and benefit sharing

This approach is designed to meet EirGrid's development strategy as well as its legal obligations under the Planning and Development (Strategic Infrastructure) Act 2006 and the Aarhus Convention.

1.2. Capital Project 966

The planned connection of new data centres across Meath, Kildare and Dublin has led to an increased demand for electricity in the east of the country. A significant amount of Ireland's electricity is generated in the south and south west, and as a result power is mainly transported to the east via two high-voltage power lines:

- From Moneypoint in Clare to Dunstown substation in Kildare;
- From Moneypoint in Clare to Woodland substation in Meath.

The transportation of increased amounts of electricity on these two lines could have a negative impact on the security of supply, as the loss of one of the lines would result in major power disruption. EirGrid is therefore proposing to ensure resilience of supply by strengthening the electricity network between Dunstown and Woodland. A full overview of the project is available [here](#) on the EirGrid website.

1.3. The Current Stage of Engagement

Capital Project 966 (CP966) is currently in Step 2 of EirGrid's six-step [Have Your Say](#) engagement process. Step 1 consisted of a [Needs Report](#) that identified the transmission network problem outlined above. The aim of Step 2 is to evaluate possible technological options to meet the needs identified, concluding with the development of a shortlist of options to be evaluated in more detail in Step 3.

In [Step 2 Part A](#), EirGrid longlisted the options for possible new lines using two criteria: technical performance and economic performance. As a result, EirGrid arrived at five best performing

options:

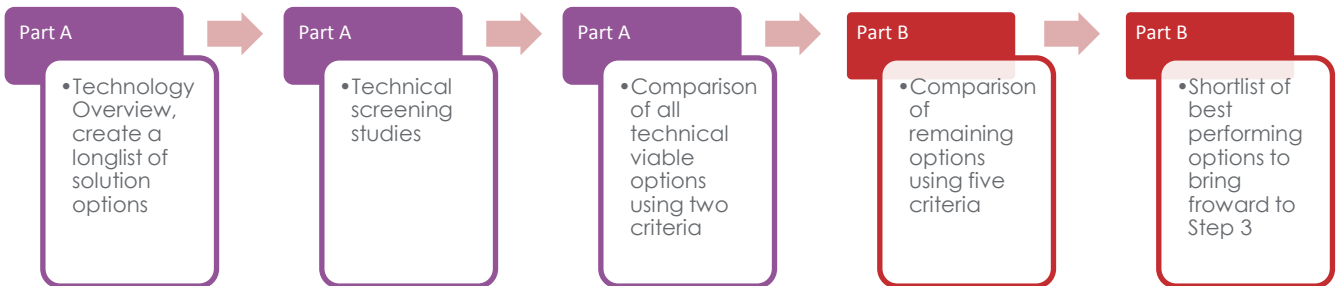
- 1) Dunstow – Woodland - Uprate of existing 220 kV overhead lines to 400 kV
- 2) Dunstow – Woodland - New 400 kV overhead line
- 3) Dunstow – Woodland - New 220 kV overhead line
- 4) Dunstow – Woodland - New 220 kV underground cable
- 5) Dunstow – Woodland - New 400 kV underground cable

In Part B of Step 2 EirGrid will evaluate these options further, assessing each one against the following criteria:

- Technical performance
- Economic performance
- Environmental aspects
- Deliverability aspects
- Socio-Economic aspect

EirGrid carried out stakeholder engagement between Part A and Part B of Step 2 as the proposed list of options can be influenced by stakeholders if reasonable justification is provided. See Figure 1 below for an illustration of Step 2.

Figure 1: Breakdown of Step 2



1.4. Step 2 engagement plan

EirGrid developed a Step 2 engagement plan to seek out, document and incorporate feedback from members of the public on the choice of technology and location for Capital Project 966. The engagement was also intended to build support for the project among strategic stakeholders such as government, political parties, community groups and representative bodies.

More generally, the engagement exercise provided the opportunity for EirGrid to highlight the potential economic benefits of upgrading the grid, by addressing the need identified in Step 1.

EirGrid's approach to engagement as outlined in the plan was to:

- Communicate clearly in plain English with people who engaged with the project,



setting out the various ways engagement can influence the decision-making process;

- Provide sufficient time and information for respondents to be able to influence project plans;
- Describe clearly the wide variety of factors that influence any decisions made.

EirGrid planned to launch an eight-week public consultation and engagement on 23 November 2018, focussing on two key locations, Meath and Kildare, by issuing press releases to local media in both counties. Other means that were designed to inform and engage with the public included:

- Sharing of up-to-date photography with media outlets and for social media;
- A dedicated CP966 section on EirGrid's [website](#);
- Distribution of a [brochure](#) via the EirGrid website, as well as hard copies printed and made available to the public and stakeholders;
- Utilising EirGrid's social media platforms as a means of communicating information about the project, public events and feedback channels, but not as a means of collecting feedback;
- A helpline with staff briefed to receive project-specific calls.

EirGrid also planned to deploy its Mobile Unit in Meath and Kildare early in the New Year, with details of appearances to be publicised in local media to inform the public.

The engagement plan also refers to research undertaken prior to the start of the consultation to understand resident and business attitudes towards grid development. Although the plan envisaged that the report would be circulated, it was not subsequently sent out to external parties, but was used internally to inform EirGrid's understanding of stakeholder views on key economic investment decisions in the region.

1.5. Strategic Stakeholders

Listed below are strategic stakeholders identified for this project, as included in the engagement plan.

- Department of Communications, Climate Action and Environment (DCCAE)
- Dept. of Business, Enterprise and Innovation
- Kildare County Council Chief Executive
- Meath County Council Chief Executive
- Kildare Public Participation Network Officer
- Meath Public Participation Network Officer
- Kildare Elected Reps (Cllrs, TDs, Senators, MEPs)
- Meath Elected Reps (Cllrs, TDs, Senators, MEPs)
- Kildare Chamber of Commerce CEO



- Meath Chamber of Commerce CEO
- Eastern and Midlands Regional Assembly
- Chambers Ireland
- Industrial Development Authority (IDA)
- Irish Business and Employers Confederation (IBEC)
- Commission for Regulation of Utilities (CRU)
- Irish Farmers' Association (IFA)
- Equine industry

2. Engagement Activities

2.1. Engagement at a Glance

Activity	Reach
Email correspondence with strategic stakeholders	24
Media	7
Social media	Facebook, Twitter, LinkedIn
Meetings	9
Written feedback including queries on the project	11

2.2. Communication Activities

2.2.1. Email Correspondence

The EirGrid project team managed an inbox where members of the public and other strategic stakeholders could submit responses to the consultation.

On 23 November strategic stakeholders including TDs, Senators, MEPs, and Local Councillors were sent information from the EirGrid project team about Capital Project 966. Some of this communication resulted in meetings with strategic stakeholders as outlined in 2.3.1 below.

Additionally, EirGrid staff members answered various queries and provided members of the public with information relating to CP966; the content of this is further discussed in chapter 3 below.

2.2.2. Media

An invitation for members of the public to engage with the project was sent out via a press release to the following publications:

- Kildare Nationalist
- Kildare Post
- KFM
- Meath Chronicle
- Meath Topic
- LMFM
- Irish Times

Following the issue of the press release, articles were featured in Kildare FM, the Meath

Chronicle, LMFM and the Irish Times (see Appendix C)

2.2.3. Social Media

EirGrid ran a social media campaign across their corporate Facebook, LinkedIn and Twitter accounts explaining how stakeholders could provide feedback on the project.

2.3. Engagement Activities

This section summarises the engagement activities undertaken by EirGrid as part of the engagement process.

2.3.1. Meetings

EirGrid arranged meetings from March 2018 onwards with stakeholders who have a specific interest in the development of CP966:

- Department of Communications, Climate Action and Environment (DCCAE)
- Industrial Development Authority (IDA)
- Kildare County Council
- Eastern & Midlands Regional Assembly Office
- Meath County Council
- Kildare County Council
- Ratoath Municipal District Meath County Council
- Matt Carthy MEP, Cllr Michael Gallagher, Cllr Maria Uí Ruairc & Cllr Darren O'Rourke

Due to the relatively early stage of this project, the planned engagement with strategic stakeholders consisted primarily of presenting materials and providing briefs. Notes from these meetings are included in Appendix E below.

While EirGrid planned to deploy its Mobile Unit in Meath and Kildare early in the New Year 2019, it was ultimately not deployed as the geographic spread was deemed to be too large this early on in the project.

2.3.2 Written Feedback

Over the course of the consultation period written feedback was received from four strategic stakeholders:

- Bord Gáis Energy (BGE)
- Regina Doherty TD
- Martin Heydon TD
- Cllr. Damien O'Reilly

Additionally, queries were raised by five members of the public and two strategic stakeholders:

- Frank O'Rourke TD
- Cllr. Michael Gallagher



3. Overview of Engagement Feedback

Strategic stakeholders who responded to the consultation agree with the need case for infrastructure improvements, while some also express preferences for specific methods to deliver these improvements. A few prefer use of the existing network to carry out the improvements.

Regina Doherty TD, Minister for Employment Affairs & Social Protection, on behalf of her Meath East constituents, expresses a preference for upgrading the existing 220kV line to 400kV. She believes that this route is shorter than other options, and further away from residential homes. Additionally, Councillor Damien O'Reilly, Meath County Council, expresses support for the use of underground cables.

Bord Gáis Energy support the need case for CP966, but want to know the extent to which EirGrid would need to invest in infrastructure developments in Greater Dublin as well as in the South West of Ireland in the future. It offers suggestions for how EirGrid could improve its service provision to ensure that Greater Dublin as well as other areas such as the South West are appropriately equipped to receive a service that is not reliant on Local Reserve Service Agreements (LRSAs). Additionally, it would like further research to be carried out to understand whether it is preferable to invest in network reinforcements or generation investments.

Most residents and strategic stakeholders who responded requested further information from the EirGrid project team about particular aspects of the project, or how the project as a whole would develop, on a range of topics including:

- **Undergrounding:** Local residents are interested in whether underground cables would be used in certain areas, referring specifically to the conversion of overground pylons to underground cables in Celbridge; Councillor Damien O'Reilly notes that undergrounding of cables has been employed between Rush and Woodland.
- **Cables:** One strategic stakeholder queries whether the cables for the underground option would be AC or DC. Additionally, one resident feels that if an undergrounding option is pursued then EirGrid should install fibre cables to improve internet coverage for local residents.
- **Communication:** A few respondents feel that the online information provided was insufficient, with one member of the public describing it as "vague" and commenting that the maps were not detailed enough. There were also requests for maps that demonstrate the route options from Martin Heydon TD, as well as local landowners, especially farmers who want to know if their land could be affected. Frank O'Rourke TD also requests a map of the existing lines that are proposed to be updated, while one member of the public asked for detailed map references including folio numbers.
- **Roads:** Residents would like to know whether the roads in their local area could be



dug up to facilitate the undergrounding of cables.

- **Environment:** Martin Heydon TD expresses concern about the potential impact on the environment, specifically with regards to ensuring the protection of the landscape in Kildare, and additionally requesting the utilisation of the existing under and overground network as much as possible.

Appendix A: Key Messages Given to Stakeholders

Below is the key information that EirGrid sent to strategic stakeholders on 23 November 2018 when the consultation began, as well as the project press release. This information was also used when providing information to other stakeholders who emailed the CP966 consultation inbox.

I am writing to inform you that EirGrid today are announcing that we are commencing consultation on a new electricity infrastructure project – Capital Project 966 (CP966) in Kildare and Meath – which will strengthen the grid in the east of the country. A press statement has issued to the media and is below for information.

This proposed development will help transfer electricity to the East Leinster region and distribute it within the network in Meath, Kildare and Dublin to facilitate the growing demand for electricity. This project will secure energy supply in Meath, Kildare and Dublin and underpin economic growth in the region.

The project, known as EirGrid Capital Project 966, is likely to involve building a new circuit that links the Dunstown(Kildare) and Woodland(Meath) substations. The Project is at a very early stage of development and the project team are currently evaluating five possible technology options - both overhead and underground - that would link the two substations.

The Options included;

- Upgrade of an existing 220 kV line to 400 kV
- A new 400 kV overhead line
- A new 220 kV overhead line
- A new 220 kV underground cable, and
- A new 400 kV underground cable.

These options will be evaluated against a set of five criteria: technical, economic, environmental, deliverability and socio-economic. Based on this, a shortlist of options will be put forward for more detailed evaluation and analysis.

The public and other stakeholders can provide feedback to the project team which will form part of the overall evaluation. This first phase of consultation starts today and runs for 10 weeks. Feedback can be provided to the project team at www.eirgrid.com <<http://www.eirgrid.com>> or by emailing leinstergridprojects@eirgrid.com. The closing date for feedback is Friday February 1st.



Please note that this is only the first consultation phase of many. We'll be out on the ground consulting and expect to be engaging with communities and landowners across the region over the coming years as we review potential corridors and routes between both stations.

Over the coming period, if you would like to get further information on the project, please contact me at padraig.slyne@eirgrid.com or on 085 8772888.

Kind Regards

Pádraig Slyne

Press release

EirGrid Begins Consultation on a New Electricity Infrastructure Project

November 23 - EirGrid is beginning public consultation on a new electricity infrastructure project that will strengthen the grid in the east of the country.

This proposed development that will help to transfer electricity to the east of the country and distribute it within the network in Meath, Kildare and Dublin.

The project will help meet the growing demand for electricity in the East. This growth is due to increased economic activity and the planned connection of new data centres in the region.

EirGrid spokesperson David Martin said: "A significant number of Ireland's electricity generators are located in the South and South West. This is where many wind farms and some modern, conventional generators are located. This power needs to be transported to where it is needed."

Power is currently transported cross-country on two 400 kV lines from the Moneypoint station in Clare to the Dunstown substation in Kildare and Woodland substation in Meath.

Transporting increased amounts of electricity on these 400 kV lines could cause problems that would affect the security of electricity supply throughout Ireland, particularly if one of the lines is lost unexpectedly.

The project, known as EirGrid Capital Project 966, is likely to involve building a new circuit that links the Dunstown and Woodland substations. It is at a very early stage of development. The project team is evaluating five possible technology options, both overhead and underground, that link the two substations.

They are an upgrade of an existing 220 kV line to 400 kV; a new 400 kV overhead line; a new 220 kV overhead line; a new 220 kV underground cable, and a new 400 kV



underground cable.

These options will be evaluated against a set of five criteria: technical, economic, environmental, deliverability and socio-economic.

The public and other stakeholders can provide feedback to the project team which will form part of the overall evaluation.

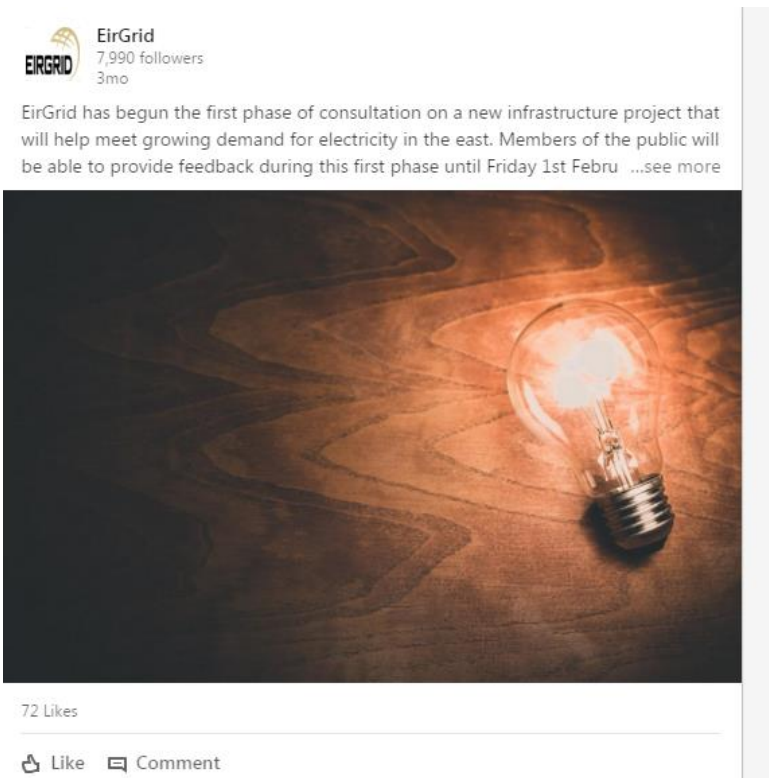
Based on this, a shortlist of options will be put forward for more detailed evaluation and analysis.

Appendix B: Social Media Engagement

Example of a twitter post:



Example of a LinkedIn post:



Example of a facebook post:



EIRGRID
Published by Jane Smith [?] · January 2 · 🌐

EirGrid has begun consultation on a new electricity infrastructure project designed to help meet growing demand for electricity in the east. Feedback can be given until Fri 01 February. Find out how you can give feedback here: <https://bit.ly/2DLVyQY> #energy #grid

1,980
People Reached

145
Engagements

Boost Post

Appendix C: Media Articles

Excerpt from the Irish Times:

Eirgrid to spend up to €190m on its network to meet increasing demand

Economic growth fuels the need for expanded electricity transmission system

Public consultation on the State body's upgrade options begins this weekend

BARRY O'HALLORAN

National electricity grid operator Eirgrid is planning a €110 million-plus boost to part of its network to meet rocketing demand from data centres and the expanding economy.

Eirgrid manages the system that transmits electricity from generators to local distribution networks through which it travels to homes and businesses.

The State company wants to connect two substations – in

Woodland, Co Meath, and Dunstown, Co Kildare – at a cost of between €110 million and €190 million to strengthen its network to meet the east coast's growing demand for electricity.

Greater Dublin's demand could double in 10 years, partly as a result of economic growth, but mainly due to the number of data centres planned by multinationals for the region.

This means that in the next decade, demand for power in the capital will grow by as much

as it did in the past 100 years.

Eirgrid is weighing five options for the expansion, which it has dubbed "Capital Project 966". These include building either a new 400 kilovolt (kv) or 220kv overhead line along a 60km route between Woodland and Dunstown.

Others involve upgrading existing high-voltage lines or potentially putting cables underground.

Environmental impact

Some of the State company's previous plans to bolster the grid have run into controversy stoked by fears of the environmental impact of high-voltage lines. Objectors regularly demand that Eirgrid puts these underground.

While the company is considering this, it would be the first time anywhere in the world



“On current estimates, the cheapest option, upgrading existing lines, would cost €110 million, while the most expensive would come to €190 million”

that a 60km high-voltage line was put underground. This would involve extra risks and

costs. On current estimates, the cheapest option, upgrading existing lines, would cost €110 million, while the most expensive would come to €190 million.

Eirgrid is beginning public consultations on the five options this weekend. Once it has narrowed down the choices, the company hopes to seek permission for the work from An Bord Pleanála within the next two to three years.

Much of the power fed to the region comes through two high-voltage lines running from Moneypoint, Co Clare, to Dunstown and Woodland. If there is a problem with one, electricity can be diverted to the other. However, as this could create bottlenecks, Eirgrid needs to connect the substations where the lines end.

Eirgrid spokesman David Martin explained that the lines

were more than 30 years old but were carrying more power than ever before.

“This is an important project that will secure energy supply in Cos Meath, Kildare and Dublin and underpin economic growth in the region,” he said.

The lines carry large quantities of electricity generated by windfarms concentrated mainly in the southwest.

About 30 per cent of the power used in the country comes from renewable sources, with wind responsible for the bulk of that. This means that a high proportion of the energy that the east coast consumes is generated in the west, which has the higher wind speeds.

IDA Ireland, the State development agency whose multinational clients are building data centres, described the plan as a significant step forward.

Excerpt from the Irish Times:

Business comment

Cantillon

High-wire act of balancing national grid

Eirgrid, the State company that operates the national electricity grid, has to balance the result of two long-standing policies. One is to encourage the development of renewable electricity, specifically wind generation. Most of the growth here has been in the west, and more particularly, the southwest.

The other is to attract multinational investment, including electricity-hungry data centres, the bulk of which end up in the east, Dublin's hinterland. The outcome is that one side of the country generates a lot of electricity while the other consumes it.

Data centres are reinforcing that pattern; their arrival means that growth in energy consumption in Dublin will double over the next decade. Consequently electricity must move across the island.

Two lines, connecting Moneypoint in Co Clare with Dunstown in Co Kildare and Woodland, Co Meath, do most of the heavy lifting here. To ensure they cope with future demand, **Eirgrid** needs to tie its end points in Cos Kildare and Meath

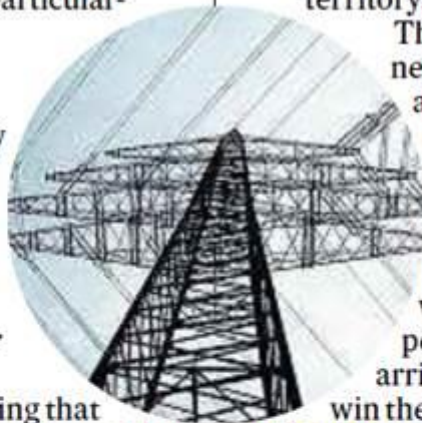
together. That could mean building a new high-voltage overhead line, boosting existing infrastructure or, very possibly, putting the cables underground. This is on the table, but involves a lot of risk as it would be going into more or less unknown territory.

This has not stopped opponents to other **Eirgrid** projects asking that it put high-voltage lines underground.

The company is beginning public consultations on this project early, presumably to ensure that when it seeks planning permission, it will have arrived at the option likely to win the most support.

Eirgrid already has support from IDA Ireland for the plan, called capital project 966. The Department of Communications, Climate Action and Environment knows of it.

As public consultations get under way, it will be interesting to see if the elected representatives, whose job-creation and energy policies **Eirgrid** is facilitating, row in behind the project.



Excerpt from LMFM:

EIRGRID OPENS CONSULTATION ON NEW PROJECT

By Michael Carolan 26 November 2018



EirGrid Capital Project 966, is likely to involve building a new circuit that links substations in Dunstown, Co. Kildare and Woodland, Co. Meath.

EirGrid has begun public consultation on a new electricity infrastructure project that will help to transfer electricity from the west of the country to Meath, Kildare and Dublin.

The rise in demand is due to increased economic activity and the planned connection of new data centres in the region.

Excerpt from Meath Chronicle:

EirGrid plans to connect Meath-Kildare substations



PROJECT Five options being considered to link Batterstown and Dunstown electricity supplies

ANN CASEY

EIRGRID is beginning a public consultation on a €110 million infrastructure project to transfer electricity to Meath, Kildare and Dublin from the west.

The company wants to connect the substations in Woodland, Batterstown to a substation in Dunstown, Co Kildare to strengthen its network to meet the rise in demand is from increased economic activity and the construction

of new data centres.

The state company is considering both underground and overground options for the project, which will cost between €110 million and €190 million

Power is currently transported cross-country on two 400 kV lines from the Mon-eypoint generating station in Clare to the Dunstown substation in Kildare and Woodland substation in Batterstown.

EirGrid spokesperson David Martin said: "These two lines

are over 30 years old and are carrying more power than ever before, particularly due to increased demand and the growth of wind energy in the south west of the country. Transporting increased amounts of electricity on these 400 kV lines could cause problems that would affect the security of electricity supply throughout Ireland, particularly if one of the lines is lost unexpectedly."

EirGrid is weighing five options for the expansion,

known as Capital Project 966, and which is expected to cost something €110 million and €190 million.

The project is at a very early stage of development and the five possible technology options include upgrading an existing 220 kV line to 400 kV; a new 400 kV overhead line; a new 220 kV overhead line; a new 220 kV underground cable, and a new 400 kV underground cable.

These options will be evaluated against a set of five criteria: technical, economic, environmental, deliverability and socio-economic.

The public and other stakeholders can provide feedback to the project team which will

form part of the overall evaluation. This first phase of consultation started a the weekend and runs for 10 weeks.

Feedback can be provided to the project team at www.eirgrid.com

The North East Pylon Pressure Campaign, who have been fighting **EirGrid** proposals for an overhead interconnector from Batterstown to Northern Ireland for over a decade said they were surprised to hear of the new project.

Noting that five technology options were being proposed for consultation with the public, chairman, Pdraig O'Reilly said no options were ever offered for the North-South interconnector (NSI).

"One of the technology options is to use a 400kv underground cable. I gather the distance in question is around 60km. It is interesting to note that **EirGrid** stated for the NSI that the longest distance possible for such a cable was 10km. So is this proposal for project 966 just a sop, with no real intention of ever considering? If yes, is it being included as a PR stunt? If no, then the statements on the NSI are false."

He said that socio-economic effects and deliverability had not been taken into account for the NSI and warned **EirGrid's** current approach to that project will result in no deliverability.



Appendix D: Statement from the IDA

Below is a transcript of the quote provided by the IDA which was used by EirGrid in press releases and other media communications:

In order to continue to win investment for Ireland, we need to have adequate commercial energy capacity to service potential future investments, so IDA Ireland views the publication of the consultation on EirGrid Capital Project 966, a key investment to upgrade the national electricity grid in the Kildare, Dublin and Meath area, as a positive step forward.

A modern and stable infrastructure with capacity to meet future industry needs is critical if Ireland is to maintain its international competitiveness. The last three years have seen record job creation numbers within the IDA Ireland client portfolio, but we cannot take this investment for granted, companies will go elsewhere unless we maintain an environment that is conducive to doing business.



Appendix E: Stakeholder engagement meeting notes

Strategic Stakeholder	Representation	Purpose of Engagement	Material Presented	Notes
Department of Communications, Climate Action and Environment (DCCAE)	Senior department officials	Information on progress in Step 2	Oral presentation	Supportive
Industrial Development Authority (IDA)	Strategic Policy Manager, Head of Technology Consumer & Business Services, Head of Property	Information on progress in Step 2	Step 2 Stakeholder Presentation	Very supportive
Kildare County Council	County Manager	Information on progress in Step 2	Step 2 Stakeholder Presentation	Supportive
Eastern & Midlands Regional Assembly Office	Senior Planner	Information on progress in Step 2	Step 2 Stakeholder Presentation	Very supportive. Will formally express support in publication of Regional Spatial & Economic Strategy document.
Meath County Council	County Manager	Information on progress in Step 2	Step 2 Stakeholder Presentation	Broadly supportive
Kildare County	Cllr Rob Power	Information on progress in	Step 2 Stakeholder	Broadly supportive. Was seeking clarification about the options and



Council		Step 2	Presentation	next steps.
Ratoath Municipal District Meath County Council	Councillors Maria Murphy (Chair), Brian Fitzgerald, Nick Killian, Gerry O'Connor, Damien O'Reilly, Gillian Toole & Maria Uí Ruairc	Information on progress in Step 2	Modified Step 2 Stakeholder Presentation	Broadly supportive in terms of the need. Expressed view of preferences to new infrastructure to be underground or maximising existing infrastructure.
Matt Carthy MEP,	Matt Carthy MEP, Cllr Michael Gallagher, Cllr Maria Uí Ruairc & Cllr Darren O'Rourke	Information on progress in Step 2, NSIC	Modified Step 2 Stakeholder Presentation	EirGrid gave an update on the project.
Catherine Murphy TD	Catherine Murphy TD	Information on progress in Step 2, CP1029	Modified Step 2 Stakeholder Presentation	She was happy to receive the overview and would welcome any future information on the project.



Appendix F: Written Feedback from Strategic Stakeholders

The following are the written responses from strategic stakeholders that were sent to the CP966 consultation inbox. Queries are detailed in Chapter 3 above but not included below.

D1 Strategic Stakeholder

Dear Liam,

I believe any proposal should be underground as per Rush to Woodland at the moment.

Thanks,

Damien

Cllr. Damien O'Reilly
Ratoath Municipal District
Meath County Council

D2 Strategic Stakeholder

To whom it may concern,

I am writing to you to outline my views on Eirgrid's 'Capital Project 966' as a TD for the Meath East Constituency. I welcome Eirgrid's attempts to strengthen the grid in the east of the country, and I especially welcome this public consultation at such an early stage in the proposed development.

Out of the five options proposed, the preferred option of the residents I have spoken to is the upgrade of an existing 220kv line to 400kv line, specifically the Gorman — Maynooth 220kv line marked in Red in the 'Northern Section' map supplied by Pádraig Slyne. I believe this option will be the strongest when evaluated against your five criteria, technical, economic, environmental, deliverability and socio-economic. The other proposed existing line for upgrade is a significantly longer route, and passes much closer to the residential areas of Batterstown, Dunboyne and Maynooth and as such would not be at all favourable.

Should a new line be the chosen development (as per option 2,3,4 and 5), I strongly support the undergrounding options. The people and land owners of County Meath have previously expressed their opinions on this and, while CP966 is a different project, I believe these opinions still stand.

I look forward to the next update on the results of this public consultation.

Kind Regards,

Regina Doherty TD
Minister for Employment & Social Protection

D3 Strategic Stakeholder

Dear Sir, Madam,

Bord Gáis Energy (BGE) welcomes the opportunity to respond to the above referenced consultation and the insight given on this project. We commend the various steps and plans undertaken by EirGrid, particularly in recent years, to enhance the transparency of network plans and stakeholder engagement in their various projects. Documents such as the 2017 Grid Development Strategy, Transmission Development Plans and Forecast Statements and EirGrid's 'Have Your Say' all help to add transparency and confidence in the network planning process.

With regard to the Capital Project 966 itself, we support this project in the context of the intention to enhance the network such that more power outside Dublin can be distributed within the network in Dublin (as well as Kildare and Meath under this project).

However, developments in the market over the last 18 months or so, in particular the awarding of Local Reserve Service Agreements (LRSAs) which has major consumer cost impacts and undermines the level playing field in the wholesale electricity market, raise significant concerns. We also note the CRU's and EirGrid's plans for "Accelerated transmission reinforcement of the Dublin Region" (per section 3.9 of the CRU's October 2018 Dublin Security of Supply paper1) and the instructions to EirGrid under CRU/17/3462 with regard to pro-actively examining areas at risk of local security of supply and a range of options to relax or resolve them. It is unclear to us as to what stage the relevant analysis and projects (including this project) are at.

In this context, we would like insight and a better sense of whether or how Capital Project 966 forms part of a wider plan that addresses existing constraints in Greater Dublin and future known issues with expected rising demand? It would be useful to see analysis from EirGrid on the overall future issue, the resolution options and how these options are going to be scoped and prioritized.

Ultimately, BGE would like to see EirGrid's plans around reinforcements or developments for the Dublin area such that there will be no further reliance on LRSAs to secure electricity supply. The system needs to support, not constrain, market outcomes if the concentration of market power in the hands of a small number of market participants is to be avoided. Together, competitive market outcomes and network reinforcements should deliver security of supply and negate the need for LRSAs to play a role in security of electricity supply.



While the obvious short-term focus, given recent security of supply concerns, is on the Greater Dublin area, we also need to consider precautions against the potential need for future LRSA type agreements elsewhere in the network. BGE urges that consideration is given in the near future to whether and when similar issues will arise down the line in other areas outside Greater Dublin such as the South West. We would like to better understand EirGrid's analysis and specific plans for such areas with detailed insight into how network reinforcement/ development will alleviate potential or actual constraints and congestion.

1 Dublin Security of Supply: Measures to mitigate the risk of disorderly exit, CRU/18/228, 5/10/2018

2 Regulatory Approach to Maintaining Local Security of Supply in Electricity, CRU/17/346, 18/12/2017

In conclusion, BGE welcomes steps and plans taken by EirGrid in recent years to enhance transparency in network planning. Given developments in the market over the past 18 months, it is clear that the system is not optimal in supporting market outcomes however, hence the need for LRSAs has arisen. An alternative view could be that the market is not designed to reflect the system.

Either way, we believe that the TSO should undertake a piece of work, incorporating this Capital Project 966, to understand what level of network investment would be required to alleviate existing constraints and to meet the expected increase in demand in the Dublin area so that we can then understand whether it is more economical to pursue network reinforcements or look to generation investments.

I hope that you find the above suggestions and commentary helpful. BGE would welcome the opportunity to discuss the issues raised above further with you but in the meantime please do not hesitate to contact me should you wish to discuss any issue therein further.

Yours faithfully,
Julie-Anne Hannon
Senior Manager
Regulatory Affairs
Bord Gais Energy

D4 Strategic Stakeholder

Phase 1 of public consultation

I understand this is the first phase of consultation as possible solutions are considered to strengthen the grid in the east of the country. While further information will become available as the project progresses, I wanted to make some initial comments on the project.

I want to see the future economic growth potential of Kildare secured. However I also



want to ensure that our local landscapes and environment are protected. For that reason the option to upgrade the existing lines or one of the underground options would be the most preferable.

Regards

Martin Heydon TD
Fine Gael, Kildare South