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Emailed to: info@eirgrid.com

26th November 2021

RE: EDF Renewables Ireland Submission to EirGrid's TSO PR5 RES-E Multi-Year Plan Consultation

EDF Renewables is part of one of the world's largest electricity companies and our investment and innovation is bringing down costs for consumers and bringing significant benefits for communities. We operate in more than 20 countries around the world. We develop, construct and operate wind farms (onshore and offshore), solar and battery storage projects, and have more than 25 years' experience in delivering renewable energy generation.

We have recently opened an office in Dublin and are already in advanced discussions for an onshore wind development pipeline of almost 1 GW with aspirations for far greater growth in Ireland across all technologies, as can be seen by our recent acquisition of 50% of the Codling Offshore Wind Farm Development, off the East Coast of Ireland and the acquisition of a solar portfolio which now has projects under construction.

EDF Renewables welcomes the opportunity to engage with EirGrid and respond to the proposals in this TSO PR5 RES-E Multi-Year Plan Consultation.

We welcome the objective of the Commission for Regulation of Utilities (CRU) PR5 reporting and incentives, as per the Executive Summary of CRU/20/154, which is to ensure *"that network companies are focused on delivering better outcomes for customers; using innovation to deliver services more efficiently; and meeting key national strategic objectives"*.

Overarching Policy Context

We believe that, in the overarching context of the climate emergency, an accelerated pace of development is now required to decarbonise the system. In this regard, we would highlight the urgent need to focus on the capacity targets in the Climate Action Plan (CAP) and Programme for Government (of 8 GW of onshore wind and 5 GW of offshore wind by 2030), rather than just 70% RES-E by 2030. Transmission network development therefore needs to allow these targets to be delivered. It is not sufficient to deliver the bare minimum for 2030 and we believe that the focus should instead be on the net-zero 2050 target. Additional renewables development beyond 2030 will be needed for further decarbonisation, in order to deliver net zero, and the grid should be developed to achieve these ultimate capacity targets. EDF Renewables believes that the electricity system must be able to operate with zero carbon system services by 2030 and a roadmap to delivery should be set out by EirGrid as part of this Multi Year Work Plan.

We welcome the Government's recently published revised Climate Action Plan¹ which has increased our 2030 renewable electricity targets to 80%, set out new electricity sector emissions reduction targets of 62% - 81% from 2018 levels and aims to complete the phase-out of coal and peat-fired electricity generation, among other targets. The Plan highlights that Ireland needs to more than double its installed capacity of onshore wind generation. Realising the full potential of the Irish renewable energy sector is one of the central elements of the CAP and it includes a suite of actions to decarbonise the electricity sector and increase the quantity of renewable generation, to meet our 2030 targets.

While it is recognised that wind energy, both on- and offshore, will not be the only source contributing to decarbonisation targets, it is already clear that it will play a key role in delivering a net zero electricity system. It should be noted that an SEAI Energy in Ireland 2020 Report² found that in 2019, electricity generated from renewable sources amounted to 11,780 GWh, already accounting for 37.6% of gross electricity consumption (compared with 33% in 2018). Wind was the largest renewable energy generator, furthermore, wind energy was the second largest source of electricity generated in 2019 after natural gas.

The recently published National Development Plan (NDP) 2021-2030³ states that *"The NDP Review commits to increasing the share of renewable electricity up to 80% by 2030... This will require a coordinated programme of investment in: Grid-scale renewable electricity generation and storage;"* The Baringa Endgame Report⁴ advises us that we can deliver 85% RES-E in the "Less than 2MtCO₂" scenario, without building significantly more capacity and with net saving of 180m Euro to Irish consumers vs 70% by 2030 but with a clear dependency that *"the bulk of the key DS3 limits have been resolved using zero-carbon solutions"*.

EDF Renewables would like to highlight the following points:

- **Greater Ambition Needed:** A greater level of ambition is needed from EirGrid and Net Zero should be the new target. The current arrangements and target of 70% RES-E is not reflective of the level of urgency required between now and 2030 to decarbonise the system and realise the full potential of renewable energy in Ireland. We note that the Roadmap to 2030 has just been published which targets 70% RES-E on the island of Ireland by 2030. This is not enough and EirGrid needs to set a higher ambition. We also note that the recent consultations (ORESS and CRU Offshore Grid) do not reflect the scale and the cost of what will be needed to deliver on the 2030 targets, as set out in the 2021 Climate Action Plan (i.e., at least 80% RES-E).
- **Staff Resourcing and improved Retention:** We recommend that EirGrid would be sufficiently resourced to deliver the multiple workstreams required, in terms of grid development, renewable connections, system operations and electricity markets, for both on- and offshore.

¹ <https://www.gov.ie/en/press-release/b0e43-the-climate-action-plan-2021-securing-our-future/>

² <https://www.seai.ie/publications/Energy-in-Ireland-2020.pdf>

³ <https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/>

⁴ <https://www.baringa.com/en/insights-news/points-of-view/endgame-a-zero-carbon-electricity-plan-for-ireland/>

- **Dispatch Down:** Constraint and curtailment continue to be an issue for renewable generators. An effective management plan to minimise dispatch down needs to be developed in order to remove this risk for renewable units. We believe that this should be a core focus of the Plan.
- **Accelerated process:** We recommend that EirGrid investigates mechanisms whereby the programme timelines can be accelerated in the relatively short timeframe between now and 2030, to ensure that the RES-E Targets can be met. There may be ways for example, to compress the six-step Grid Development Process down to several overlapping stages operating in parallel. This would enable the faster delivery of projects.
- **Investment and SNSP:** A resilient grid is essential to meeting our 2030 RES-E targets and longer-term decarbonisation goals. The CAP sets out a vision of how we can decarbonise Ireland's energy system, which is unlikely to be achievable without significant investment in reinforcing and upgrading the grid infrastructure to accommodate the large volumes of renewable generation that will be required. Investment should be focused on facilitating the increased future power demand on the grid and striving towards a zero-carbon system that can operate with 100% System Non-Synchronous Penetration by 2030.
- **Range of renewable technologies:** EDF Renewables believes that a range of renewable technologies will be critical to Ireland meeting the 2030 RES-E targets. We would urge EirGrid to facilitate the connection of a wide range of renewable technologies to the grid, including both on- and offshore wind and solar PV generation, hydrogen and other supportive technologies such as interconnection and battery storage.
- **Unlocking Offshore Wind:** We believe that EirGrid should aim to deliver the capacity targets in the CAP and PfG of 8 GW of onshore wind and 5 GW of offshore wind by 2030 rather than just achieving 80% RES-E by 2030.
- **Innovation:** We recommend that alternative network solutions such as storage, demand side response and smart wires would be developed, to free up additional capacity or alleviate some of the need for network reinforcement. If private wire were allowed by EirGrid, developers would be enabled to create their own connections. This could potentially help the EirGrid to release some of the consented projects. Building the foundations of the network that will be required beyond 2030 will mean building some backbone infrastructure projects and the introduction of innovative technologies which enable smart use of the grid.
- **Operational Policy Roadmap to 2030:** We welcome the proposed Operational Policy Roadmap to 2030 which set out *"how operational policy and standards, along with operational tools, will be modified to reflect the new way in which the TSO will act as RES-E increases in Ireland."* We would welcome more detail on this Roadmap.

In conclusion, we would like to thank EirGrid for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Stella Burke on stella.burke@edf-re.ie or me. I confirm that this letter may be published on the EirGrid website.

Yours sincerely



Kevin Daly
Head of Development Ireland