ESB Generation and Trading's response to TSO PR5 RES-E Multi-Year Plan 2022-2026

03/12/2021

ESB Generation and Trading (ESB GT) welcomes the opportunity to respond to this consultation. The comments are grouped into two categories:

- Workstreams:

    o Operational Policy Roadmap to 2030

        ▪ Supportive of the proposed updated every two years.

        ▪ The Roadmap should set out how the TSOs will remove barriers to the integration of new technologies. Currently, the TSOs are unable to fully accommodate Battery projects as the TSO IT systems do not allow the submission of negative PNs. TSO systems should not be a barrier to the efficient operability and participation of new technologies in the market.

    o Detailed studies and analysis to support progress towards the 2030 targets

        ▪ Supportive of this workstream and the need for transparency on this study is critical for the industry to understand what the barriers are and how it can help create the solutions.

    o Overarching Workstream

        ▪ One of the fundamental workstreams to achieve the RES-E penetration as set by the CRU will be the implementation of an effective System Service Future Arrangements (SSFA) and more importantly to this PR5 multi-year plan is the interim arrangements. Unfortunately, at this moment in time the interim/transitional arrangements are still unknown and therefore its impact on this plan is unclear.

        ▪ An area that should be considered as a workstream for achieving the RES-E target is the assessment of the DS3 budget and if it is still suitable for the period up to May 2024 and achieving the CRU RES-E targets.

- Weighting

    o In terms of performance assessment, the weighting of each criteria should reflect the importance of the criteria in achieving the overall objective i.e., ensuring that the TSO plays its part in increasing the portion of electricity coming from renewable sources to achieve a 3% increase each year. It is unclear from the consultation the impact that each workstream will have on achieving the objective and therefore it is not clear how an equal weighting can be applied to all of the workstreams. Greater

reasoning on this proposal is needed before it is possible to determine if the proposal is proportionate.