

EirGrid Response to the Private Wires Public Consultation

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1.1 Key Messages

EirGrid welcomes the consultation and acknowledges the potential role Private Wires could play in accelerating the transition to Net Zero. It is important that in developing a policy on this topic, the potential benefits of Private Wires are quantified and balanced against related challenges and risks. The approach to Private Wires should be complementary to the plan-led approach outlined by EirGrid in [Shaping Our Electricity Future v1.1](#)¹ and in the Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System published by the Department of the Environment, Climate and Communications (DECC) in 2021.

Having a single Transmission System Operator (TSO) with responsibility for operating, managing, and developing the electricity transmission system offers significant benefits in terms of safety, security, and reliability. Whilst we are open to the potential for multiple asset owners, careful consideration needs to be given to how this would work in practice, and to the role of the TSO, to ensure an effective and efficient approach which supports the delivery of Ireland's ambitious climate targets and carbon budgets. Maintaining power quality and ensuring social equity are also key considerations, in addition to the detailed points outlined in the response below.

1.2 Introduction

EirGrid has a significant and central part to play in the facilitation and delivery of Ireland's 2030 renewables targets and its longer-term carbon neutral ambitions. Our [strategy](#)² is shaped by climate change and the transition of the electricity sector to low-carbon, renewable energy, underpinned by our purpose to transform the power system for future generations. As Transmission System Operator (TSO), EirGrid has sole responsibility for operating, managing, and developing a safe, secure, and reliable electricity transmission system in an economical and efficient manner. This includes exploring and implementing opportunities for interconnection. In 2021, under the Government Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System, EirGrid's role as TSO was expanded to incorporate the operation and ownership of Ireland's offshore electricity transmission grid.

EirGrid welcomes the publication of Private Wires Public Consultation (hereafter referred to as 'the Consultation') and the opportunity to respond. We recognise that transformational and innovative policies, measures, and actions, coupled with societal change will be required to meet the electricity sector's climate targets and to stay within carbon budgets. We need to prioritise those areas which contribute most towards meeting our renewable ambition and focus our efforts as an industry in delivering these. The plan-led approach, put forward in Shaping Our Electricity Future v1.1, and recognised in the Consultation, lays out how stakeholders will need to work together collaboratively, ensuring that the resources required to deliver Climate Action Plan (CAP) targets are deployed in the most efficient and effective manner possible.

EirGrid recognises that Private Wires have potential to support growth of renewables and contribute to Ireland's ambitious targets. However, this topic is highly complex and, as reflected in the detailed nature of the Consultation, careful consideration needs to be given to a wide range of areas including regulation, efficient planning and operation of the electricity grid, security and quality of supply, appropriate total system cost allocation, and public acceptance, to ensure that any policy which is brought forward ensures overall benefit to State and society. If and where

¹ https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping-Our-Electricity-Future-Roadmap-Version-1.1_07.23.pdf

² <https://www.eirgridgroup.com/about/strategy-2025/>

Private Wires are taken forward, care is needed to ensure that these developments fit with the plan-led approach to accelerate achieving CAP targets.

From EirGrid's perspective, it is essential that the introduction of Private Wires supports and does not impede our ability to fulfil our core remit and ultimately the delivery of the government climate targets. For this reason, it is essential that DECC engages closely with both system operators on the development of any Private Wires framework to minimise the potential risks and ensure effective rollout. We look forward to working with DECC on this topic and remain available to discuss any of the matters raised.

1.3 Potential Opportunities for Private Wires

The Consultation acknowledges that there are various and extensive understandings of Private Wires; each use case comes with its own pros and cons. Private Wires do have the potential to contribute to meeting renewable targets. For example, in some cases, where there is limited capacity in local networks, Private Wires may enable local communities to engage more directly with local renewable generation. Likewise, where energy is being utilised on commercial and industrial sites, Private Wires can enable the use of on-site renewable generation to help deliver energy needs.

The benefits Private Wires can bring are highly dependent on the specific application or use case. For example, Private Wires which serve co-located generation and demand, entirely (or nearly entirely) on private land, could be useful in helping to deliver energy policy without significant complications, provided there is good coordination in the development and operation of the Private Wire (e.g. if the Private Wire is connected to the local transmission or distribution network, then studies would be required to ensure that other customers remain securely connected and power quality is maintained). However, Private Wires arrangements linking demand and generation some distance apart, covering lengths of public land and / or road, would be more likely to introduce significant challenges to effective system development and operation. The same applies for offshore; Private Wires would introduce significant complexity. For this reason, it is difficult to see compatibility between developer-led Private Wires and the plan-led approach which has been outlined by DECC (further details are provided on this below).

1.4 Contestable Builds & Hybrid Connections

The contestable build process was introduced in 2010 to allow private entities to construct electricity infrastructure in a way which ensures safe, secure, and reliable operation and maintenance. Under this process, EirGrid provides the technical specification and standards according to which new transmission assets are built under their supervision. On completion, ownership of the assets transfers to the Transmission Asset Owner (TAO), ESB Networks. Since its introduction in 2010, approximately 2500 MW of renewable capacity has connected at transmission level, the vast majority of which was built contestably. The contestable builds process provides an alternative route to national grid development, offering some similar benefits to Private Wires whilst avoiding many of the potential challenges.

Separately, EirGrid is currently working closely with ESB Networks and the Commission for Regulation of Utilities (CRU) to progress a framework that will facilitate hybrid connections. Hybrid connections allow for multiple forms of technology (such as thermal, wind and solar generators, and Energy Storage Power Stations (ESPS)) to be connected behind a single connection point. They can lead to higher utilisation of grid infrastructure and may achieve some of the same objectives

as Private Wires more quickly and effectively. Hybrid connections allow developers to increase the total installed capacity at a single connection point, and therefore provide an opportunity to minimise grid connection costs and make the best use of existing infrastructure. This offers a simpler way to expand existing connections where new grid development may be complex and have a lengthy lead time for deployment. For example, allowing for the colocation of technologies through hybrid connections may make it possible for the deferral of grid reinforcement investments and improved connection possibilities for areas that lack the required network capacity to develop new generation or storage projects.

EirGrid believes that the development of a Private Wires policy should consider the explicit benefits of Private Wires in terms of delivering climate targets in comparison with the existing contestable builds process, and the hybrid connections process currently being optimised.

1.5 Considerations & Challenges associated with Private Wires

1.5.1 Efficient Planning of Electricity Infrastructure

The scale of the challenge to deliver 2030 targets is unprecedented and transformational change to the power system is required. This will require very significant investment, and coordination across the entire electricity ecosystem in an efficient, strategic, and managed way to ensure that the energy transition is delivered in a sustainable and affordable manner, which delivers maximum societal benefits. Shaping Our Electricity Future v1.1, referenced in the Consultation, is EirGrid's roadmap outlining a plan-led approach to delivering the 2030 targets of 80% renewables whilst also meeting the sectoral carbon budgets. We welcome acknowledgement in the Consultation that plan-led approaches will play a key role in delivering the renewable generation and grid infrastructure required to meet these targets; Private Wires development should be permitted in a way which avoids conflicts with this plan-led approach.

The construction of Private Wires could lead to sterilisation or sub-optimal use of potential transmission routes that might otherwise have been used for connection of other generation, demand developments or other electricity infrastructure such as new cables or overhead lines. For example, the construction of a Private Wire that has been designed for a generation development may mean that we are unable to connect other local developments as a network route has been used in a sub-optimal way. If not coordinated with other transmission development, even the construction of a small capacity Private Wire could potentially sterilise or limit a route for a line which could facilitate significantly greater capacity. Ultimately, this could hamper progress towards achieving targets. A well-coordinated plan-led approach would identify routes and potential issues; if implemented correctly, Private Wires could potentially be complementary.

Private Wires should be subject to the legislative framework which currently exists for the development of electricity infrastructure. Consideration needs to be given to the impact of introducing Private Wires on state agencies including, but not limited to An Bord Pleanála (ABP), the National Parks and Wildlife Service (NPWS), the National Roads Authority (NRA), the Maritime Area Regulatory Authority (MARA) and other planning authorities. With a less co-ordinated approach to development, there are likely to be increased demands on these agencies.

The introduction of Private Wires would by nature introduce competition in terms of key skills and the wider supply chain for example in relation to raw materials, specialists, manufacturing, and delivery. Scarce resources need to be used efficiently; a piecemeal approach whereby ad hoc electricity network development comes from different places does not align with this. With

different parties developing transmission infrastructure, there is a risk that more important work be delayed due to scarce resources. A Private Wires policy needs to reflect this and ensure that the development of private electricity infrastructure does not hinder the ability of EirGrid, and other relevant parties, to achieve this. We would recommend conducting thorough analysis of implementation of Private Wires in other jurisdictions to understand success cases and challenges experienced in order to learn from these examples and avoid similar issues in Ireland.

1.5.2 Offshore Wind

In relation to offshore wind, it is challenging to see how Private Wires could be compatible with the plan-led approach already laid out by DECC in the 2021 Policy Statement on the Framework for Ireland's Offshore Electricity Transmission, which reached the decision that "transmission system assets to be planned, developed, owned and operated by Ireland's existing electricity Transmission System Operator (TSO), EirGrid" which had been "identified as delivering maximum societal benefits".

In DECC's 2023 decision on Offshore Phase 2, it was decided that central policymakers would establish "a set volume of offshore wind capacity for development within individual Offshore Renewable Energy (ORE) Designated Areas, which will be designated according to legislative provisions for Designated Maritime Area Plans (DMAPs) in the Maritime Area Planning (MAP) Act", also noting that "the location of ORE Designated Areas for Phase Two will be geographically aligned with available onshore grid capacity". In addition to making the best use of onshore grid capacity, it is also important that available landing points to shore are planned and utilised effectively.

Whilst these decisions are made with respect to Phase 2 auctions only, we note the policy intention to move towards a fully plan-led enduring regime and, therefore, expect that subsequent phases will also determine where offshore wind will be permitted via a DMAP process (potentially including specific ORE site selection), taking into account available onshore grid capacity as per the Phase 2 decision. Given that ORE development is expected to be permitted in DMAP zones only (from Phase 2), and that these DMAPs will be identified with onshore grid availability in mind, any Private Wire connections used could effectively sterilise available grid capacity for other offshore network development.

We acknowledge that in a ringfenced offshore hydrogen development, Private Wires may be a potential solution. However, it is our view that EirGrid, as TSO, would still need to be involved for good coordination, to ensure that potential landing points and onshore infrastructure is used most effectively.

If Private Wires were permitted for offshore, consideration would need to be given to how to ensure Ireland maintains a strong and coordinated position with clear priorities in relation to potential future collaboration with other jurisdictions to provide further interconnection capacity, or on North Seas offshore wind collaboration, as committed to via the Ostend Declaration made earlier this year. The opportunity to develop joint offshore or hybrid projects with other countries (specifically those noted in DECC's Interconnector Strategy) could be diminished if valuable onshore grid capacity proximate to offshore wind DMAPs is made available to Private Wires developers (and therefore unavailable to be included in an overarching plan-led approach).

1.5.3 Regulation & Standards

The Consultation outlines that industry have indicated that Private Wires could provide a faster or cheaper route to connecting renewables. In EirGrid's view this would need to be assessed in

further detail (also considering reliability, quality, and the full lifecycle of the assets) and quantified; we welcome that the Consultation acknowledges this. The development of Private Wires should involve the same statutory requirements in terms of planning, environmental and other consenting procedures that must be undertaken in the current circumstances. It must be recognised that this is a lengthy and detailed process even when executed at maximum efficiency.

EirGrid is responsible for ensuring that all reasonable demands for electricity are met whilst having due regard for safety and the environment. To that end, EirGrid develops policies setting out the acceptable standards and regulations for electricity infrastructure which will become part of the transmission system. EirGrid also maintains and develops technical standards, including functional specifications and standard drawings that are available to assist customers opting to connect contestably to the Irish transmission system. These technical standards govern the design and construction of new transmission assets as well as providing guidance when developments are proposed in proximity to existing transmission infrastructure.

If substandard equipment or methodologies were employed for Private Wires, this could put operators, the public and potentially transmission infrastructure in proximity at risk. The risk of public safety issues or injury increases with the size of Private Wires, especially if covering large lengths of public land. Therefore, where electricity users intend to operate with both a Private Wire and transmission system connection, clear arrangements would be needed during design and operation. The connection assets and equipment would need to meet agreed standards and the system design would need to ensure that the interconnected system would be safe to operate in respect of short circuit levels, voltage management, power throughflows and other power system criteria. This would require power system studies to be conducted and in the case of impact on the existing transmission system, consideration would need to be given to how the cost of reinforcements or additional equipment is covered.

1.5.4 Operation & Maintenance

Currently all generation connecting to the transmission system are subject to the Grid Code which specifies the minimum requirements and / or capabilities that the generation units must meet. If generation units are connected via Private Wires, it is essential that they are subject to the Grid Code and the European Network Codes. If not, there is a substantial risk that the requirements that generation units would need to meet could vary significantly depending on whether they connect to the transmission system or via a Private Wire which would result in operational challenges. Where Private Wires are operated interconnected with the wider network, it would need to be decided whether the Private Wires connected generation would be subject to all relevant rules regarding scheduling and dispatch, how frequency and voltage would be maintained under all conditions, and how the network would be restored in the event of a failure within the Private Wire. Consideration also needs to be given to operational complexities which could arise in relation to generation connected to large and extra-large energy users (LEUs and XLEUs) via Private Wires but not to the transmission system. If EirGrid does not have full visibility of all non-synchronous generation connecting to the interconnected electricity system at any given time, safe and reliable planning, and operation of the electricity system, including management of curtailment events, would be challenging and the security of wider users would be reduced. Consideration also needs to be given to operational complexities which could arise in relation to generation connected to large and extra-large energy users (LEUs and XLEUs) via Private Wires but not to the transmission system.

A long-term view in relation to Private Wires development is required as these assets have a lengthy lifespan and management of Private Wires infrastructure requires access to specific, specialist skills and materials. If substandard asset management plans are in place or the asset owner is not able to access the skills and / or materials required to carry out maintenance, it would represent a risk to both operators, public and / or equipment connected to or in proximity to Private Wires. Additionally, coordinated maintenance would be needed to avoid situations where developers are digging same road twice for two different circuits; unless cable routes are accurately recorded and shared, this will cause issues for safety management, ongoing development, and network maintenance. Measures need to be in place to manage the potential consequences for operation and maintenance should the asset owner cease to exist; this could result in stranded assets if the Private Wires can't easily be subsumed into the national grid due to incompatibility caused by different specifications. In this instance, it should be recognised that work may be required to improve or upgrade network assets if, under a Private Wires policy, the current system operators were to become operators of last resort.

Where renewables operating in a Private Wire arrangement have registered for subsidies, the operation and output will need to be monitored on an ongoing basis. The current mechanism in Ireland is for monitoring to be based on network operator metering so, dependent on the structure of the new arrangements, renewable output may not be counted. Unless changes were made, the monitoring of renewables for subsidies and targets would need to be revised.

1.5.5 The Benefits of a Single TSO

The Consultation acknowledges the benefits of having a single TSO, and Distribution System Operator (DSO), in terms of setting and ensuring safety and compliance standards as well as centrally planning and operating the power system under a plan-led approach. The Systems Operators currently have a wide range of roles set out in European and National legislation including, but not limited to, licences, grid and network codes, regulatory directions and policies, price controls, industry frameworks, etc. which have developed over decades. Having multiple System Operators could potentially be viable in larger markets, however, Ireland is a small island, and introducing additional System Operators would be likely to introduce unnecessary challenges in relation to the efficient operation of the electricity system.

EirGrid, as the sole TSO, is responsible for development and maintenance of the Grid Code. In relation to the European Network Codes, TSOs (i.e. EirGrid in Ireland) have a formal role in developing, amending, and implementing the codes in their respective transmission systems. As part of this process, EirGrid actively engages with relevant industry parties including developers through established and transparent stakeholder engagement mechanisms. Introducing additional TSOs in the context of Private Wires could lead to inconsistencies across the system and introduce complexities in terms of TSO decision making and policy development. EirGrid would suggest that such an approach is not likely to be beneficial to Ireland's contribution to TSO collaboration in Europe due to potentially conflicting priorities.

However, we do acknowledge that multiple asset owners could potentially be accommodated successfully provided detailed consideration is given to how this would work. Additional system operators could also potentially be accommodated in this context, but with more limited scope and obligations.

1.5.6 Public Acceptance & Stakeholder Engagement

EirGrid welcomes recognition in the Consultation that public acceptance is key to delivering the change needed to meet targets, and that without community support the level of ambition will not be realised. The same applies for other bodies including utilities, roads authorities, local authorities etc. involved in the planning and development process; close engagement and coordination is required to ensure efficiency and support. As outlined in Shaping Our Electricity Future v1.1, public engagement is a key pillar underpinning EirGrid's work to deliver the ambitious 2030 climate targets. EirGrid have set an exceptionally high standard over recent years through extensive activities aimed at achieving public and wider stakeholder acceptance, detailed in the EirGrid [public engagement strategy](#)³ and [community benefit policy](#)⁴.

Significant effort is required by communities to engage with projects, and it is becoming more frequent; appetite for further engagement on grid projects could be impacted and the risk of stakeholder fatigue needs to be managed carefully. If multiple parties are taking forward transmission development, there is a risk that developments may not be presented to stakeholders and communities in a clear and holistic way. The level of community support and public acceptance for projects is highly dependent on the engagement and consultation approach taken by the developer or developing body to understand community views and the potential impact. Additionally, stakeholders may not distinguish between EirGrid and private developer activities. Therefore, there is a risk of less clarity for communities on accountability, and negative experiences relating to the development of Private Wires could create legacy issues which impact on EirGrid's ability to deliver the required national grid development. Once eroded, trust is extremely difficult to build back.

However, EirGrid does acknowledge that, in some cases, Private Wires could potentially facilitate greater community uptake in the energy transition. If communities are benefitting from local generation and community benefit funds, they are likely to become more familiar with the electricity infrastructure developments required to deliver climate targets and more supportive of future work. Therefore, given the scale of the challenge in achieving targets for 2030 and beyond, the electricity ecosystem needs to work together rather than in competition.

1.5.7 Public Roads & Public Lands

The use of roads for utilities is common practice, however, there is a practical limit to how much can be accommodated within the public road network. Therefore, consideration should be given to prioritising strategically important utilities which serve the national interest as part of a planned coordinated approach. In this context, EirGrid would view national grid infrastructure as more likely to have greater socio-economic benefit in achieving climate action targets compared to Private Wires. Given that there is already a backlog in the planning system, the prioritisation of projects in the context of Private Wires will be important.

Since October 2020 a protocol has been in place for interaction between Transport Infrastructure Ireland (TII) and Local Authorities with the ESB and EirGrid during the development of major national road schemes. The protocol is to ensure early identification of potential conflicts and the timely design and approval of all necessary alterations to existing transmission circuits. The protocol also ensures the early identification of opportunities that may arise between national

³ <https://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Public-Engagement-Strategy.pdf>

⁴ <https://www.eirgridgroup.com/site-files/library/EirGrid/209130-EirGrid-Community-Benefit-Policy-A4-Report-final.pdf>

road development schemes and new transmission circuits that are at route selection stage. In October 2023, a Cooperation Agreement has been entered into by representatives from both roads and electricity sector (EirGrid, Transport Infrastructure Ireland, ESB Networks, the Commission for Regulation of Utilities, the Department of the Environment, Climate and Communications, County and City Managers Association, and the Department of Transport). The core principles of the agreement are a commitment to work together to accommodate the high voltage infrastructure provided that significant road impacts are identified and addressed. It acknowledges that underground routing along public roads infrastructure, where practical, is a key enabler of Shaping Our Electricity Future v1.1, and recognises costs of participation and potential future liabilities and costs. Lastly it agrees that protocols will be developed between the parties in line with best practice to allow operation, maintenance, and repair of both electrical and road infrastructure. This represents the output of extensive engagement by both sides. In this context, development of a Private Wires policy should ensure that sufficient attention is given to future development and operation of both the national road network and the national transmission network.

In relation to statutory powers for access to public roadways and land, detailed consideration should be given to whether extending this to Private Wires developers would be in the national interest. Under the Electricity Act, landowners have a statutory entitlement to compensation. There are many private entities developing projects and landowner compensation is well established and understood by these companies. The balance needs to be assessed of the individual property rights versus the national interest; careful consideration needs to be given to how this would work in the context of Private Wires in terms of assessing the public interest of private developers obtaining access to land for their own commercial use.

1.5.8 Security of Supply

As outlined in the Consultation, electricity is vital for the proper functioning of society and the economy; ensuring security of supply is therefore a priority of national and EU policy. This must be done in a way which is sustainable, affordable, and aligned with Ireland's climate targets and carbon budgets. Private Wires would provide the opportunity to connect more renewable electricity, however, this generation is by nature variable. The Consultation outlines that demand users would therefore be unlikely to be able to meet their own demand entirely through a Private Wire and would need back up generation. If this is provided by the national electricity grid, it would place additional demand on the system and thus create challenges for ensuring security of supply, especially as back up generation is most likely to be required during periods of low wind when the grid is already under most pressure.

If Private Wires projects bring additional demand from new LEUs or XLEUs (as opposed to providing generation for existing energy users), this challenge is more significant; EirGrid welcomes that the consultation recognises that Private Wires in this scenario offer little net benefit to the wider electricity system. If back up is not provided by the electricity grid, it would be likely that Private Wires projects have their own generation, most likely using gas. This would reduce the direct impact on electricity security of supply issues but would potentially create a similar set of challenges for security of supply of gas (which is still required for national electricity generation requirements). Relying on fossil fuelled gas back up generation would also make it more challenging to meet climate targets and carbon budgets, and it may be more difficult for monitoring and managing emissions from fully off-grid Private Wires arrangements.

1.5.9 Network Charges & Social Equity

EirGrid welcomes recognition in the Consultation that a shortfall in network costs will have to be met by those paying network charges. This is an important consideration and raises the issue of social equity of Private Wires. Where Private Wires are developed such that generation or large demand customers avoid elements of network charges, this impacts other users; Private Wires that continue to be connected to the wider network will benefit from the wider security that this provides whilst being subsidised by other network users. The network investment and maintenance to ensure that demand requirements can be met continues to be required. The charges associated with network investment and maintenance are linked to metered consumption and if this is reduced by on-site generation, network investment and maintenance costs are socialised on other electricity consumers. Should Private Wires be widely introduced, then the recovery of network charges should also be reviewed so that the balance of charges faced by customers remains fair.

1.6 Conclusion

In summary, the scale of the challenge to delivering Ireland's climate targets is unprecedented and requires transformational change of the electricity system. Private Wires present a wide range of opportunities and certainly have the potential to facilitate increased deployment of renewables. However, there are many complexities and risks associated with the deployment of Private Wires, as outlined in the response above, and these require careful consideration as part of the policy development process. Although some of the Private Wire cases covered in the Consultation could help deliver renewables targets, several cases contradict a plan-led approach and could potentially make it more difficult unless managed carefully. EirGrid would like to reiterate that whilst some use cases would be less challenging to implement, in the context of offshore, Private Wires are incompatible with the plan-led regime which has already been laid out by DECC.

Given the various considerations required, it is EirGrid's view that further, detailed analysis is required to determine and quantify the precise benefits of Private Wires and priority use cases which have greatest potential to help, and not hinder, the delivery of climate targets whilst ensuring maximum societal benefits. A more refined approach to introducing Private Wires would also be more implementable in the short to medium term and therefore have greater chances of delivering the expected benefits.

Overall, whilst EirGrid acknowledges that there may be some benefits through use of Private Wires, the TSO should remain closely involved to ensure efficient and effective development of new transmission assets. We would welcome the opportunity for further engagement with DECC on the development of a Private Wires policy and would strongly urge that further consultation takes place.