

Comments and Observations

Date: 16/11/2017

Project: Solar Farm Clearance Draft Policy

No.	Document	Section number (e.g. Clause 3.1)	Type of comment ²	Respondent	Comments	Proposed change	Observations of EirGrid / ESBN
1.	EirGrid Group Policy Issue 1_Rev 0	Policy & Principles	ge	RES	The draft policy intends to define the placement of PV solar farms directly below or adjacent to existing 110 kV, 220 kV and 400 kV overhead transmission lines and in proximity to transmission assets. However it does not seem to define clearances related to 220kV lines, 400kV lines and transmission substations.	Inclusion of clearances for 220kV lines, 400kV lines and transmission substations with the scope of the draft policy.	The draft policy applies to all transmission voltages.
2.	EirGrid Group Policy Issue 1_Rev 0	Policy & Principles	ge	RES	The draft policy requires solar farms developments near transmission lines to provide risk assessments demonstrating mitigation to identified hazards.	Could the term “near” be quantified for more clarity i.e. how many metres from transmission assets?	It is up to the developer to determine what the potential hazards are through their risk assessment. These hazards may be particular to a specific site and need to be assessed on a case by case basis.
3.	EirGrid Group Policy Issue 1_Rev 0	Policy & Principles	ge	RES	Referenced document “derogation policy issue 1 (internal document, signed May 2013)” does not appear to be available publicly.	Please provide referenced document.	Internal EirGrid document – This does not inform the consultation process.
4.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	ge	Bord na Mona	Large setback distances (above 10m) resulting in land sterilisation that cannot be utilised for solar farm development which can affect the commercial viability of a project.		Setback distances have been re-assessed based on conductor clearances and exclusion zones. The setback distance from 110kV outer conductors has been reduced to 5 metres.
5.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 4, clause 4.1 / Section 6, clause 6.1	ge	Bord na Mona	Other than that stated in the Electricity (Supply) (Amendment) (No. 2) Act, 1934 section 20 (1), there is no justification for the required 23m setback distance from the centreline of OHL's. With that, the Act also does not state that structure cannot be erected under transmission lines. It clearly sets out that prior to erection of structures within the 23m area that notice is to be provided.	Further justification of setback distances.	The 23 metre setback has been removed in relation to clearances from conductors. It has been retained in relation to setback from structures to allow for pole replacements, conductor restringing and movement of vehicles around structures.

1 Type of comment: ge = general te = technical ed = editorial ct = contractual

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6.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	te	Bord na Mona	The setback distance from angle/strain masts are not clearly justified nor are the discussed in detail in the provided MMD report.	Further detail/rationale should be provided, this also includes details on the requirement for having demountable type panels within a radius of 100m of the angle/tension structure.	The setback distances for angled structures are to allow for restringing operations and these have now been reduced for the 110kV system to provide more voltage specific values.
7.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	te	Bord na Mona	The benefit and practicality of the proposed requirement for solar panels within 100m from angle/tension masts being demountable when the support piles/structures remain is unclear.		The intention is for demountable panels to be constructed such that they can be removed to allow vehicle and plant access. We would have envisaged that the support piles would have been replaced by ground mounted supports.
8.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.2	te	Bord na Mona	The new requirement for a 4.5m wide access wide road is viewed as over specified and could be reduced e.g. 3m wide access track. Furthermore misinterpretation should be avoided for this requirement i.e. the access track is required to provide access to the transmission corridor and can be achieved through a single access track.	Possible reduction of width dimension of access track.	This is the standard track width provided under EirGrid functional specifications.
9.	EirGrid Group Policy Issue 1_Rev 0	Policy & Principles	ge	ISEA	Proposed clearance distance as set out in the Draft Policy is too restrictive and sterilizes a large portion of land on which electricity poles and towers reside. Limitations on area available for the development of solar farms as a result of proposed clearance distances. Report published by EirGrid doesn't adequately justify the clearance distances proposed.	Further adequate justification required on proposed clearance distances.	Clearances have been revised and justified based on ground clearances and exclusion zones.
10.	EirGrid Group Policy Issue 1_Rev 0	Policy & Principles	te	ISEA	The proposed 46m corridor and 10m clearance from outer conductor as set out in the proposed policy is not adequately justified and is too restrictive.	Clearance distances should be based on electrical clearances and should be in the region of 4-5m from the conductor. ISEA wish to engage further with EirGrid on the matter to	Clearances have been revised and justified based on ground clearances and exclusion zones.

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						develop suitable clearances based on electrical safety distances and not nominal hazard zones.	
11.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	ge	ISEA	The proposals for solar farm clearances in the Republic of Ireland are contrary to separation distances set out by members of the Energy Networks Association of which ESB and EirGrid are members.		EirGrid are not bound by separation distances set out by other utilities.
12.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	ge	Elgin Energy	The proposed clearances are too restrictive and no guidance has been provided to justify the proposed set back. Any set back distances should be based on electrical clearance distances as set out in recognised international standards.	Elgin Energy proposes reducing clearance corridor from 46m to 15m for transmission line towers/intermediate type support structures. Reduce clearance distance of solar panel/farm from outer conductor of transmission line.	Clearances have been revised and justified based on ground clearances and exclusion zones.
13.	Policy Statement on clearances between Transmission lines and PV Solar farm developments	Section 6, clause 6.1	ge	Elgin Energy	The proposed set back distances will have an economic impact on each project due to the presence of overhead lines. Each landowner in turn will be impacted. It is our understanding that the ESB and IFA operate a code of practice where lines will be heightened or undergrounded where they interfere with a development or the landowner may be entitled to compensation if neither is possible.		This policy has been developed from a maintenance and safety perspective. Economic impacts are beyond the scope of this working group.

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