

3 December 2021

**Emailed to:** [info@eirgrid.com](mailto:info@eirgrid.com)

**RE: TSO PR5 Imperfections & Constraints Multi-Year Plan 2022-2026**

Wind Energy Ireland (WEI) welcomes the opportunity to engage with EirGrid and provide feedback on the TSO PR5 Imperfections & Constraints Multi-Year Plan 2022-2026.

WEI is the nation's largest renewable energy organisation with more than 150 members who have come together to plan, build, operate, and support the development of the country's chief renewable energy resource. We work to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future.

We would like to make the following comments in relation to the consultation:

The majority of imperfections are made up of dispatch balancing costs (DBC), and these costs have been rising in recent years, due to a highly constrained system with increasing renewable generation. One of the key means of reducing DBC is reducing and then removing system operational constraints such as minimum conventional generational units and sourcing more system services from low-carbon technologies such as storage and synchronous condensers. This will have a huge impact on reducing DBC, reducing renewable constraints and should be a key focus of the plan with clear aims and targets to be achieved. We are concerned that the plan is vague and light on detail in these areas which makes success more subjective and harder to assess.

We would also comment that network constraints are also extremely important and recent ECP constraints analysis shows that this is a major problem for many areas of the country where renewables will be connecting. If constraints are not addressed this will add significant cost to the deployment of renewables in Ireland and damage our ability to meet interim RES-E targets and ultimately our 2030 RES-E target. We would welcome a workstream on reducing transmission constraints which ties into reinforcements identified in the Shaping our Electricity Future Roadmap, but also addresses additional network solutions that can facilitate the delivery of our 80% RES-E target by 2030,

## Reserve Policy

We welcome the initiative to review reserve policy and relax some of the current operational constraints but more specifics on outputs and goals is needed. There is a large volume of new technologies such as battery storage, DSUs and even wind farms that are contracted to provide reserves, but we are concerned that the approach is too vague and will be too conservative in removing current conventional generator constraints and relying on these new reserve sources. The plan would benefit from quantified steps as to how reserve requirements will be met from alternative sources going forward which is an extremely important mechanism to remove or relax current operational constraints on the system.

## Transmission Constraint Group

WEI welcome the outcomes in relation to the removal/relaxing of constraint groups in Q1 2022 due to the Ballyvouskil Reactor and in Q4 2023 due to the Moneypoint synchronous condenser. It is noted however that this will not happen until operational experience of each these new technologies is attained by the TSO and so more information on what this means and how long it will take, including any potential delays, should be communicated in the final document.

## Conclusion

We thank EirGrid for offering us the opportunity to provide feedback on TSO PR5 Imperfections & Constraints Multi-Year Plan 2022-2026. We are available to discuss any of these points at your convenience and we look forward to further engagement.

Yours sincerely



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