10 December 2021

Emailed to: info@eirgrid.com

RE: TSO PR5 Strategic Objectives Multi-Year Plan 2022-2026

Wind Energy Ireland (WEI) welcomes the opportunity to engage with EirGrid and provide feedback on the TSO PR5 Strategic Objectives 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:

In general, we support the proposed work areas and structure in the plan, but we would like to emphasise that the workstreams in this plan must be considered in the context of the updated national policy target of 80% RES-E by 2030. This is likely to require re-consideration of the PR5 annual targets and objectives which may no longer be appropriate and will not put us on the right path to delivering 80% RES-E by 2030. This is likely to require tweaking of the current plan rather than wholesale revision and is something that could be considered in further editions in subsequent years.

Networks

WEI are very supportive of initiatives to increase grid capacity, improve the efficiency of the network and facilitate the build out of renewables.

We are supportive of the work to improve the approach to asset health, outage planning and maintenance. Outages and equipment failures on the network can cause significant disruption to renewables and we would welcome an approach that improves the resilience of the network but also explores ways of ensuring planned and unplanned outages are minimised e.g., through a review of strategic spares policy.

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We also support the rollout of new technology solutions and non-wires solutions to enhance grid capacity and believe this should be closely linked to plans in the Shaping our Electricity Future (SOEF) roadmap with defined timelines and programme plans. We would also stress that these technologies could play a critical role in facilitating the additional RES-E required to hit the 80% target by 2030 and we would welcome more details on how this will be considered in future plans.

It is also clear that TSO/TAO cooperation will be essential to the success of these initiatives. Recognising that there is an ambitious programme for grid development in SOEF and grid development projects can have significant lead times we would welcome further clarity in subsequent reports on how TSO/TAO joint working approaches have improved delivery times and what projects have been delivered.

One area we have significant concern with is the initiative to support location of generation where electricity grid capacity is available. This requires much further thought, clarification and industry engagement. It is not clear to us that any Government or regulatory mandate has been issued to move away from the current developer led grid model and to do so could have significant impacts on the developing renewable pipeline. We would be in favour of the TSO being incentivised to find ways of providing capacity for the onshore and offshore wind projects that are in the pipeline to 2030 and looking at what is required in terms of grid infrastructure beyond 2030. We will be engaging with EirGrid separately on this through the SOEF roadmap.

Markets

We acknowledge that there are multiple dependencies here and that specific plans may have to be defined as policy matters become clearer e.g., Government decisions on further RESS auction timelines, SEMC decisions on system services future arrangements and implementation of Clean Energy Package Articles 12 & 13. We welcome further engagement with EirGrid as policy developments become clearer.

We are supportive of a level playing field for all market technologies and this requires particular focus on area such as wind generation (e.g. update of the wind dispatch tool) and energy storage (e.g. ability to utilise negative PNs and be fully included in scheduling and dispatch). These areas would benefit from being drawn out specifically in the plan.

We are also very conscious of the need for capacity market reform and alignment with our longer-term decarbonisation objectives. It is important that unabated fossil fuel generation is not locked

in over the longer-term, and this requires important considerations and requirements for flexible generation, transferring to renewable gas/hydrogen over time and incentivisation of alternative low carbon capacity such as long-duration energy storage. We would highlight the ongoing consultations/call for evidence in GB on capacity market reform for net-zero and incentivisation of long-duration energy storage as examples we could use here to kick-start this conversation.

Operations

As was the case with the original DS3 programme which targeted 2020 and 75% SNSP, there should be a clear plan of how the SNSP limit will be increased in steps up to 100% in 2030, and Min Gen levels significantly reduced, and this should be regularly updated and communicated to industry. We welcome the development of the Operational Policy Roadmap and hope to be able to engage on the development and outputs of this and build on what has worked well so far in the DS3 programme.

As part of this workstream a study to understand how much an increased SNSP limit is expected to reduce curtailment and the interaction with the other system constraints like minimum conventional generation levels would be useful to determine which work areas have the biggest impact on RES-E.

Further to this, a key operational metric is the total capacity of minimum level of conventional synchronous generation on the grid during times of dispatch down as opposed to just the minimum number of sets required. The required minimum generation MW capacity and technically possible minimum generation MW capacity should be clearly tracked in a uniform time series manor in the same way as SNSP is calculated for every half hour or hour. This would be a good means of monitoring and improving operation of minimum generation over time.

We would also note that flexibility, grid forming services and system restoration do not seem to have a short-term focus in this plan, however they impact the type of generators and converters connecting. It is harder to retrofit and receive these services especially in offshore, so it will be important that the roadmap also focusses on developing and incentivising these capabilities.

Engagement

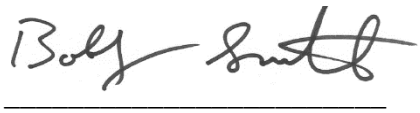
We support the engagement activities outlined but are concerned that engagement with the renewables industry is not specified or given enough emphasis in the plan. It is essential that

industry and EirGrid cooperate closely to deliver and integrate the renewable generation, and supporting technologies, needed to meet our decarbonisation goals. We would recommend that industry is called out as a specific stakeholder here which would include engagement in areas such as the SOEF roadmap, dispatch down and renewable connections to name a few.

Conclusion

We thank EirGrid for offering us the opportunity to provide feedback on TSO PR5 Strategic Objectives 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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