

Sycamore House Millennium Park Osberstown Naas, Co. Kildare

An Bord Pleanála 64 Marlborough Street Dublin 1

21st August, 2015

Re: The proposed North-South 400KV Interconnector Development

Dear Sir/Madam,

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body representing more than 200 members involved in wind and renewable energy development in Ireland and Northern Ireland (through the Northern Ireland Renewables Industry Group (NIRIG), set up in collaboration with Renewable UK). IWEA represents members with projects across the spectrum, in operation, under construction and awaiting connection. In Ireland IWEA members are involved in the majority of connected projects but also involved in more than 85% of the MW of currently grid contracted projects.

Our observations concern the submission to An Bord Pleanála (Reference No.02.VA0017) of a proposed development by EirGrid for a 400 kV electrical interconnector which will link the electricity network in Ireland to that of Northern Ireland.

IWEA appreciates the opportunity, through An Bord Pleanála, to support EirGrid's application for the development of this project which is being dealt with as a Strategic Infrastructure Development.

IWEA welcomes the proposal by EirGrid and SONI (the System Operator for Northern Ireland) for a new high capacity electricity interconnector between the electricity networks of Ireland and Northern Ireland, which represents an investment of €280m. Currently there is only a single 275kV North-South tie-line between the two networks which has been seen to be insufficient to the needs of the two modern economies. The development of an additional 400kV interconnector to increase the flow of electricity both North and South will enable and empower the two networks to operate jointly and more efficiently for the benefit of consumers, industry and the environment. IWEA believes that the proposed development is a critical piece of infrastructure for the Island of Ireland.

IWEA as the largest renewable energy industry association in Ireland would welcome the establishment of a North-South Interconnector. Both Ireland and Northern Ireland have developed strong and growing wind and renewable energy sectors with a combined wind energy capacity now standing at over 3GW of installed wind capacity. The development of this North-South interconnector would enable the more efficient use of our Island's significant renewable energy resource by allowing

more efficient cross-border use of our renewables capacity, and bringing with it the significant climate benefits associated with increased renewable use.

On 1st November 2007 the Single Electricity Market (SEM) went live, commencing the trading of wholesale electricity in Ireland and Northern Ireland on an All-Island basis. Almost eight years later the need for a more consistent and fit-for-purpose interconnector to ensure a fuller integration between the two systems could not be clearer.

The availability of a high capacity North South Interconnector will serve a number of positive functions, primarily it will improve the security of electricity supply for both Ireland's and Northern Ireland's power grids by ensuring a stable and consistent link.

The functioning of a 400kV interconnector would serve by increasing competition and promoting cross border trading in electricity, to also reduce costs by reducing serious current constraints that restrict the efficient operation of the Single Electricity Market. There remains a cost to inaction as the significant delays in the development of this Interconnector is today adding additional and avoidable costs relation to network constraint, further adding to prices. Delivery of the interconnector is estimated to reduce network constraint costs across the all-island market by €20m per annum in 2020 and by €40m per annum in 2030.

This increased connection would stand in line with the increased focus at EU level on integrating electricity markets across Europe. In its Communication on the Energy Union issued in February 2015 and supported by the Irish Government, Ireland was one of the Member States identified as being insufficiently connected with the EU electricity market.

The rise in high-tech, high electricity requirement Foreign Direct Investment into Ireland, symbolised by the recent 2015 decision by Facebook and Apple to locate renewable powered data centres in Ireland with an associated investment of over €1bn, clearly illustrates the need to ensure a high quality and secure electricity supply as an enabler for Foreign Direct Investment. The importance of such a secure and sustainable electricity supply to the SME sector cannot also be overestimated as a vital part of the critical infrastructure necessary for business.

In conclusion for the reasons outlined above, IWEA would ask An Bord Pleanála in its deliberations to allow the necessary progress of this North-South Interconnector. This project has already been significantly delayed since it was originally proposed and any additional delays will increase the cost to the economy and the consumer.

Yours sincerely,

Kenneth Matthews,

Chief Executive Officer,

Irish Wind Energy Association.