

IWEA Response to the EirGrid draft Transmission Development Plan (TDP) 2015 – 2025
22 January 2016

IWEA welcomes the opportunity to respond to this consultation on the EirGrid draft Transmission Development Plan (TDP) 2015 – 2025. A strong electricity grid is an essential component of any modern economy and is essential to our economy and our way of life. Given the aging transmission system, there is a clear need to update and maintain the infrastructure. The changing generation and demand needs of the system also need to be reflected in the new Grid Development Strategy, and IWEA welcomes these developments. The Irish electricity system has a significant level of constraints which increase the cost of running the system and add costs to the consumer. Grid development is essential to minimise these costs and to ensure the most efficient use of the system and the generation fleet.

This TDP outlines the drivers of network development, the network investment needs and the projects required addressing these needs. The main drivers are to secure transmission network supplies, to promote market integration and to promote the integration of Renewable Energy Sources (RES) and complementary thermal generation. The network investment needs include provision of connections, addressing of local constraints, facilitation of interregional/area flow, provision of interconnection capacity and refurbishment/replacement of assets. IWEA strongly agrees that there is a need to facilitate the integration of renewables on the system, however the importance of strengthening and updating the overall system is also significant

IWEA welcomes EirGrid's strong commitment to ensuring that Environmental Policy is adhered to, in order to sustainably develop of the Transmission System.

IWEA welcomes EirGrid's increased focus on public consultation. Gaining public support is vital to progressing the Transmission Development Plan and in turn the expansion of renewable energy in Ireland.

IWEA welcomes the additional information provided in Appendix C which outlines the drivers for different projects. This provides useful information in relation to the projects and clarity for customers and stakeholders.

IWEA has responded to previous consultations on the Draft Transmission Development Plan and notes that the following suggestions still apply in making the document more useful to stakeholders in the energy industry, while making better use of the resources required to complete the document and fulfil EirGrid's regulatory obligations:

1. The risk associated with projects should be identified. It should be noted that the generator bears the risk of delays to transmission infrastructure and information regarding the risks should be made available.
2. Details on the success of project roll-out to date based on dates provided in previous TDP's should be provided. This will enable stakeholders to have a reasonable estimate of future success.

IWEA notes that the Transmission Development Plan should place more emphasis on the legal requirement of the RES Directive in terms of the obligation to have priority access, priority of dispatch and guaranteed transmission of renewable generation, and how these obligations are being achieved.

Summary

As the leading association for the Irish renewable energy sector, IWEA would consider ourselves as a proactive partner, willing to step out in explaining the benefits of an effective, modern and climate friendly Irish electricity system, and we look forward to continuing our work alongside EirGrid in this regard.

IWEA would welcome the inclusion of additional information as outlined above in an effort to make the document more useful to stakeholders in the energy industry.