Electricity Transmission Performance Report 2020 and Investment Planning and Delivery Report 2020,
EirGrid, 160 Shelbourne Road,
Ballsbridge,
D04 FW28

Emailed to: info@eirgrid.com and consultations@esbnetworks.ie

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EDF Renewables response to ESB Networks and EirGrid's consultation on the draft Annual Electricity Transmission Performance Report 2020, and the Investment Planning and Delivery Report 2020

EDF Renewables is part of one of the world's largest electricity companies and our investment and innovation is bringing down costs for consumers and bringing significant benefits for communities. We operate in more than 20 countries around the world. We develop, construct and operate wind farms (onshore and offshore), solar and battery storage projects, and have more than 25 years' experience in delivering renewable energy generation.

We have recently opened an office in Dublin and are already in advanced discussions for an onshore wind development pipeline of around 800 MW, with aspirations for far greater growth in Ireland across all technologies, as can be seen by our recent acquisition of 50% of the Codling Offshore Wind Farm Development, off the East Coast of Ireland and the acquisition of a solar portfolio which now has projects under construction.

EDF Renewables welcomes the opportunity to engage with EirGrid and ESB Networks and respond to this consultation. We believe that, in the overarching context of the climate emergency, an accelerated pace of development is now required to decarbonise the system. In this regard, EirGrid and ESB Networks urgently need to focus on the capacity targets in the Climate Action Plan and Programme for Government (of 8.2 GW of onshore wind and 5 GW of offshore wind by 2030), rather than just achieving 70% RES-E by 2030. Both transmission and distribution network development needs to allow these targets to be delivered. It is not sufficient to deliver the bare minimum for 2030 and we believe that the focus should instead be on the net-zero 2050 target. Further renewables development beyond 2030 will be needed for further decarbonisation to deliver net zero and the grid should be developed to achieve these ultimate capacity targets. EDF Renewables believes that the electricity system must be able to operate with zero carbon system services by 2030 and a roadmap to delivery should be set out by EirGrid and ESB Networks.

We note the following recommendations, concerns and observations in relation to both reports: -

- **Investment in a resilient electricity grid** - A resilient electricity grid is essential to meeting our 2030 renewable electricity targets and our longer-term decarbonisation goals. The Climate Action Plan sets out a vision of how we can decarbonise Ireland's energy system. This is unlikely to be achievable without parallel development of the transmission and distribution systems to accommodate the large volumes of renewable generation that will be required. Coupled with

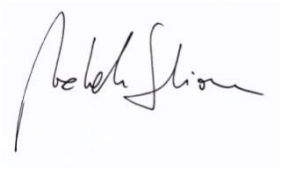
increased electricity demand, the existing transmission and distribution grids were not designed for the increased levels of power flows that are predicted. The grids will require significant investment if they are going to be fit for the needs of 2030 and beyond.

- **Reinforced and upgraded grid infrastructure** - It is imperative that EirGrid and ESB Networks reinforce and upgrade the grid infrastructure now, in order to accommodate the predicted increased future demand and to strive towards a zero-carbon system that can operate with 100% System Non-Synchronous Penetration (SNSP).
- **Dispatch Down** - Constraint and curtailment continue to be an issue for renewable generators. An effective management plan to minimise dispatch down needs to be developed in order to remove this risk for renewable units.
- **Resourcing** - We recommend that both EirGrid and ESB Networks would be sufficiently resourced to deliver the multiple workstreams required, in terms of grid development, renewable connections, system operations and electricity markets.
- **Innovation** - We welcome the updates provided in the Annual Electricity Transmission Performance Report 2020 on both EirGrid and ESB Networks' innovation projects, some of which may allow significant capacity upgrades. We agree that alternative network solutions such as storage, demand side response and smart wires could free up additional capacity or alleviate some of the need for network reinforcement. If private wire were allowed by EirGrid and ESB Networks, developers would be enabled to create their own connections. This could potentially help EirGrid and ESB Networks to release some of the consented projects. Building the foundations of the network that will be required beyond 2030 will most likely mean building some backbone infrastructure projects and the introduction of new and innovative technologies which enable smart use of the grid.
- **Transmission Developments** - We welcome the progress which has been made in 2020, as detailed in the Investment Planning and Delivery Report 2020, in terms of renewable connections and increasing capacity; demand and data centre connections; and system reinforcement and refurbishment projects, known as Associated Transmission Reinforcements (ATRs). We would also urge both EirGrid and ESB Networks to examine any mechanisms whereby the six-step Grid Development Process can be accelerated – and perhaps even compressed to several overlapping stages operating in parallel. This would therefore enable the faster delivery of projects.
- **Decision-Making Process** - We welcome the clarity provided in the Annual Electricity Transmission Performance Report 2020 regarding the decision-making tools currently being developed in the control Centre. We would welcome more transparency around risk to projects and mitigation plans around this, as the generator bears the risk of delays to transmission infrastructure and information regarding the risks should be made available.

In conclusion, we would like to thank EirGrid and ESB Networks for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Stella Burke on stella.burke@edf-re.ie, or me. I confirm that this letter may be published on the EirGrid and ESB Networks websites.

Yours sincerely



Michele Schiavone

Director for Offshore Wind and Ireland