Wind Energy Ireland,
Sycamore House, Millennium Park,
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Emailed to: info@eirgrid.com and consultations@esbnetworks.ie

RE: Investment Planning & Delivery Report 2020

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 thank EirGrid and ESB Networks for offering the opportunity to respond to this consultation on the Investment Planning & Delivery Report (the Report) for 2020 and we would like to make the following comments in relation to the report.

Need for Live Information

We believe it would be more beneficial for EirGrid to establish a live register of grid development projects which could be published and maintained on the EirGrid website which could consolidate other documents such as the ATR updates and TDP, instead of an annual report process. WEI has provided detailed feedback and recommendations to the SOs on grid information. More up to date information on grid development that allows stakeholders to track progress against targets would be of more benefit to industry and would alleviate some of the workload on the TSO in having to produce detailed annual reports.

The live register could provide information on all ongoing or planned grid development projects as well as ATRs. This would be much more valuable information for industry and would also, in our view, be a better use of EirGrid resources.

The register could show high level stats for the calendar year with a link to a description of the EirGrid 6-step process but should also contain a breakdown of all projects in development in the 6-step process. Information that should be reported is as follows:

- Project Code, Project Name, Project Description
- Individual Project Approved Budgets and Actual Outturn Cost

- Project specific estimated timeline for each development step versus actual timeline
- Further Milestone tracking required within Steps for significant projects
- Flag if FAQ is created by completion of project and number of MWs released
- Outages required and programmed dates and durations

The Six-Step Grid Development Process

Notwithstanding our comments above we believe the report would benefit from more detailed information on the projects highlighted under each step of the 6-step development process. It is useful to have the process broken down by step, but the information provided is high-level. It would be helpful to provide a breakdown of the individual projects progressed in each step and how this compared against programme target timelines. Without this benchmarking detail it is difficult to tell how efficient or effective the SOs' grid development process has been.

Network Development Expenditure

This section is not entirely clear as it hard for readers to baseline 2020 projects against the initial PR4 programme to determine how the SOs have performed against targets. It appears that the Price Review process is one of ongoing change, but besides high-level figures no detail is available on the individual projects, or types of projects, that have been completed, delayed, or fallen away and how this compares against the SOs' initial plans at the outset of PR4.

It is also interesting to note that "At the end of 2020, the actual outturn programme cost over the full PR4 period was €231m lower than the PR4 allowance of €985M as forecast in 2015." We recognise that Covid-19 impacted construction activities in 2020, but this accounted for €30m in reduced spend against the total outturn for the PR4 period. More detail would be welcome on this lower than forecast spend in the PR4 period i.e., were planned projects delivered below budget or not delivered at all or delayed etc?

Finally, we would like to thank EirGrid and ESB Networks for the opportunity to engage with you on this report and we are available to discuss any of the points raised above in more detail.

Best Regards,

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