

6 Merrion Square North,
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Date: 21st December 2023

By email to: CRMSubmissions@uregni.gov.uk and CRMsubmissions@cru.ie

EAI welcomes the opportunity to respond to this consultation. Our response relates solely to the aspect of the consultation relating to decarbonising of dispatchable plants in SEM and as such, no comments are made in relation to intermediate length contracts for existing thermal plants.

EAI's Our Zero Emissions Study shows the importance of dispatchable generation in maintaining security of supply as we transition to much higher levels of renewables. More work can be done and there are opportunities to reduce emissions. EAI welcomes the fact that the SEM Committee has sought to explore opportunities to introduce low carbon dispatchable generation into the CRM. As the SEM Committee shows, there is evidence from other jurisdictions to review and EAI is engaged on this at EU level through Eurelectric.

In a workstream which, at this point in time, must be separate to the consideration of intermediate length contracts for existing plants, EAI encourages the SEM Committee to further explore ways to bring more zero carbon dispatchable generation through the CRM either through new build or supporting the decarbonisation of existing plant. Clean technologies and flexible resources require large CAPEX investment, which suggests that a specific focus on the investment framework for capital intensive technologies is needed. During 2024, EAI will progress thinking in this area and stands ready to engage with the SEM Committee. The area is complex and requires time, but we believe an appropriate solution is possible which creates the right framework to encourage decarbonised, dispatchable generation.

We welcome the commencement of this initiative and look forward to working further with the SEM Committee on this important subject in 2024.

Yours Sincerely,

A decarbonised future powered by electricity.

Electricity Association of Ireland

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