

FAO: Market Modelling Group (CRU) and All-Island Regulation Team

24 July 2026

Re: WEI Submission on Network Imperfections Charges 2026/27 Consultation (SEM-26-29)

To whom it may concern,

Wind Energy Ireland (WEI) welcomes the opportunity to respond to the consultation on Network Imperfections Charges for 2026/27.

WEI recognises that Network Imperfections Charges have become an increasingly significant component of electricity system costs and that reducing these costs will be important in delivering an affordable, secure and low-carbon electricity system.

WEI has recently established a System Costs Working Group to analyse, track and ultimately identify opportunities to reduce system-level electricity costs associated with the deployment of wind generation and energy storage. The Group's work seeks to move beyond individual technology capital costs and instead focus on broader system operational costs. Its remit encompasses Transmission Use of System (TUoS) charges, ancillary services and, most critically, Network Imperfections Charges.

Given the timing of this consultation, the Working Group has not yet had sufficient opportunity to develop a detailed industry position on the matters raised in the consultation paper. Accordingly, WEI does not wish to comment on the detailed proposals at this stage.

As part of this work, WEI has secured a commitment from EirGrid to host a dedicated workshop to examine the structural drivers of Network Imperfections Charges in greater detail. This will provide an important opportunity to better understand the underlying causes of these costs, assess potential mitigation measures and identify areas where further analysis is required.

Following this initial analytical phase, WEI looks forward to engaging directly with the CRU and UR to share our findings and discuss potential policy and regulatory levers in greater detail.

Yours faithfully,

*Dave Linehan*

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Wind Energy Ireland