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IRELAND

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To whom it may concern,

CONSULTATION ON FIRM ACCESS METHODOLOGY IN IRELAND

Introduction

Iberdrola Renewables Ireland is part of Iberdrola, a global leader in tackling climate change with a commitment to reaching carbon neutrality by 2050. Iberdrola already has over 38GW of renewable energy capacity world-wide, with a commitment to invest €47billion in the energy transition by 2025 and further investment of up to €75 billion by 2030 in order to deliver capacity exceeding 100GW (alongside electricity networks investment).

Our company has a proud history of operating on the island of Ireland for over 25 years. We now operate six onshore windfarms with a total capacity of around 60MW and have secured planning consent to re-power our Barnesmore wind farm in County Donegal, increasing generating capacity from 15 MW to potentially over 70MW. We also have consent to repower two of our windfarms in Northern Ireland: Rigged Hill and Corkey.

Iberdrola Renewables Ireland is also leading the way in the development of Battery Energy Storage Systems (BESS) having recently completed the 50MW Gorman BESS in County Meath - the company's first operational commercial-scale battery storage system anywhere in the world. Plans are already underway to double the capacity of the Gorman BESS to 100MW and to add to the smaller 3MW BESS that is already operational at our Barnesmore windfarm. Our onshore windfarms and battery storage projects are operated by our subsidiary in Ireland, ScottishPower Renewables.

Ireland has some of the greatest offshore wind resources in Europe, which is why we have joined up with Irish headquartered DP Energy to develop three offshore wind projects that will help deliver 3GW of clean energy. The projects are located in three areas on the east, west and south coasts of the country. Once operational, they will generate enough green energy to power the equivalent of 2.6 million Irish homes.

Iberdrola Renewables Ireland welcomes the opportunity to respond to the SEM Committee's consultation on '*Firm Access Methodology in Ireland – EirGrid Proposed methodology*'. We note that we fully support the positions outlined in the Wind Energy Ireland (WEI), Renewable NI (RNI) and Energy Storage Ireland (ESI)

responses to the consultation questions[1]. This submission will provide some supporting comments and will focus primarily on the key issues and interests of onshore developments for Iberdrola Renewables Ireland/ Scottish Power Renewables (SPR).

General Comments

Iberdrola Renewables Ireland believes there are significant opportunities for renewable investment in Ireland and Northern Ireland given the abundance of renewable resources. However, there are several obstacles to overcome such as dispatch down and firm access.

Iberdrola Renewables Ireland therefore, supports the publication of a consultation on a new firm access methodology, as clear firm access policy is critical for generators in assessing future investment. While in principle we agree with some of the proposals set out in the consultation, we have identified a number of issues. Our main points are set out below with more detail provided in our responses to the consultation questions in Annex 1.

Firm threshold

The proposal appears to be that Firm Access Quantities (FAQs) will only be scheduled where granting FAQs to a connected generator would not bring the expected level of constraints above the threshold in a region. We cannot comment on the merits of this proposal because no information has been provided on how it will work in practice or on the methodology that will be used. An opportunity to comment on a methodology would be required before a final decision on the firm access process is made.

Concerns about EirGrid issuing locational signals

While we understand the need to include an assessment of Additional Transmission Reinforcements (ATRs) within the methodology, we have concerns about the potential for EirGrid to issue locational signals based on their planned ATRs and constraints in regions. We are not convinced that it is the place of a transmission system operator (TSO) to influence developer investment in a competitive market. We believe it is the role of EirGrid to facilitate the connection of projects through appropriate investment in the network and as a consequence, to reduce network constraints.

Planned ATRs will not reduce constraints in certain regions

The firm access policy proposes that time bound firm access dates will be linked to the planned completion of ATRs. We agree that time bound access dates is a good proposal and that they are linked to the planned completion dates. Linking these to the actual completion dates would not be appropriate as this would result in the development of projects being negatively impacted by, for example, TSO delays that are outside of developer control. More importantly, we are concerned that there are not sufficient ATRs planned to reduce constraints sufficiently (in

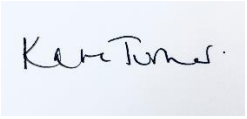
[1] Scottish Power Renewables (SPR) is a member of these associations. SPR is a subsidiary of Iberdrola Renewables.

some of the most constrained locations) meaning some new renewable and repowering projects may not receive Scheduled FAQ offers.

EirGrid needs to be incentivised to proactively reduce constraints
Constraints are the reason why a firm access methodology is necessary. The European Commission has directed that the dispatch down of renewables must be a last resort, and that if this is called upon, then the generator should be compensated. The European Commission's Clean Energy Package Regulation goes further and states that measures to reduce dispatch down of renewables must be introduced by TSOs and that dispatch down must be minimised for renewables. Subsequently, we believe that the CRU needs to consider the effectiveness of existing incentives on EirGrid to reduce constraints. We propose that the existing incentive is more specific and that there is a new firm access target.

Our responses to the individual questions are contained in Annex 1. If you have any questions in relation to our response, please do not hesitate to contact my colleague, Adrienne Costello, at acostello@iberdrola.ie.

Yours sincerely,



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ANNEX 1 CONSULTATION ON FIRM ACCESS METHODOLOGY IN IRELAND
Iberdrola Renewables Ireland Responses to Consultation Questions

Time bound access dates

Question 1/ *Comments are invited from interested parties on EirGrids proposed approach of having a time bound Firm Access date. Comment are also invites on alternative options (i.e ATRs etc). Should scheduled FAQ date be linked with ATRs, with more targeted delivery incentives? Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

The consultation proposes that generators are guaranteed to receive firm access on the date associated with a Scheduled FAQ offer which would be based on the projected date for completion of ATRs that will bring the capacity in the network area above the firm threshold.

Iberdrola Renewables Ireland supports the proposal for a time bound firm access date. Time bound firm access dates allow developers to plan more effectively and help to provide certainty with regard to this aspect of their investment.

We agree that the Scheduled FAQ offer date should represent the actual date that the developer will get firm access. While there may be delays in delivering ATRs, this should not limit or delay a developer's ability to get firm access for a site. We would argue that the existence of time bound firm access dates will incentivise EirGrid to minimise delays.

We agree with a time bound access date based on the projected date for completion of ATRs. However, this means that developers are dependent on EirGrid to plan sufficient ATRs to allow the developer to invest in a particular area. This could result in EirGrid influencing where investment happens. The consultation refers to this as locational signals. We believe this will create a barrier for existing sites that have repowering development plans. Repowering projects need to be incentivised as much as new renewable projects and a 'locational policy' could be viewed as discriminatory to existing connected projects with repowering plans. Further, it is the responsibility of EirGrid to ensure that ATRs are planned and will deliver the required capacity in areas where developer investment is taking place. Finally, developers should have the ability to identify suitable opportunities for investment and should not be restricted by locational signals issued by the TSO that indicate limitations in investment proposals.

Ireland has ambitious targets to achieve by 2030, and beyond. Therefore, it is imperative that policies designed to enable this ambition do not disincentive investment or create barriers or uncertainty. We would draw you attention to the grandfathering provision that was introduced by SEM Committee. The provision means that new renewable projects will not have priority dispatch and will be dispatched down over existing generation. In relation to existing sites that are repowered, priority dispatch will be lost and, as a result of a 'new' connection agreement being issued, the site will potentially lose firm access. Therefore, these sites will be dispatched down over other existing generation projects that have retained firm access. More so, as there aren't sufficient ATRs planned by EirGrid

in all locations, constraints are likely to remain/increase, meaning new renewables will be dispatched down regularly. As a consequence, new renewable generation will encounter barriers to access when developing business cases to invest in Ireland. It is worth noting that new and repowered sites will naturally be more efficient in operation and therefore economic overall.

Where planned ATRs do not provide sufficient capacity for planned generation, we believe it is essential that Scheduled FAQ offers are still provided to generators. Without FAQs and the consequential uncertainty, developers cannot be expected to invest. While we understand the challenges EirGrid face, we believe every effort should be made to provide certainty for developers.

Article 13 (4) of the Clean Energy Package EC/2019/943 states that EirGrid (as TSO) must report annually to the Regulatory Authority on, among other things, '*the measures taken to reduce the need for the downward redispatching of generating installations using renewable energy sources or high-efficiency cogeneration in the future including investments in digitalisation of the grid infrastructure and in services that increase flexibility'*. The intent of this Article is to ensure that TSOs reduce the necessity of dispatch down and report on how they will do this. EirGrid must therefore ensure that constraints are minimised in all areas where required. With this in mind, we do not believe that it is acceptable that the consequences of the proposal could force developers to invest in locations that have low constraints or where ATRs are already planned. We do not believe that this is the intent of the Regulation.

In addition to assessing planned ATRs, we suggest that EirGrid also look at the storage developments that are in place or planned as part of the firm access methodology. Energy storage is beneficial in many ways in that it can reduce constraints in already constrained areas and it does not impact materially on constraints in a region. The Scheduled FAQ offer date should take into account ATRs (using the latest information available to EirGrid) and plans for storage which will alleviate constraints.

In addition to this response, we also support the issues raised in the WEI and ESI responses for question 1.

Question 2/ *Comments are invited from respondents regarding EirGrid's historical performance on delivering ATRs. How can EirGrid's performance be improved? Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

The delivery of ATRs is of considerable importance to the achievement of Ireland's 2030 decarbonisation goals. EirGrid needs to be incentivised to deliver ATRs in a timely manner and to identify appropriate ATRs that will incentivise investment across the country. As set out in our response to question 1, we believe the proposals are flawed in that EirGrid is proposing to issue locational signals that will ultimately have the goal of incentivising generation investment in certain parts of the country. If EirGrid doesn't commit to ATRs in all areas that require capacity, there is a risk that existing generators will be disadvantaged and that investment will be concentrated in certain areas, creating unintended consequences of increased boundary constraints.

With regard to timelines, it is widely recognised that delays are commonplace. We agree with WEI in that the maximum duration allowable for ATR completion should be based on standard timelines rather than based on a measure of actual timelines for recent ATRs. EirGrid must be incentivised to meet standard timelines. Lead times for large-scale transmission reinforcements can take up to 10-15 years and if EirGrid waits until renewable projects are either consented or have received a connection offer before starting to design and commence grid reinforcement projects, then the renewable pipeline will face significant delivery delays and Ireland will fall significantly short of 2030 targets (and targets thereafter.)

Our experience in other jurisdictions indicates that a wind project can take around a decade to progress from development through to construction. We suggest that this is sufficient time for a transmission system operator to consider the reinforcements required. Early engagement is key to ensure necessary ATRs are planned and introduced as early as possible.

Partial firm access quantities

Question 3/ *Comments are invited on whether stakeholders agree with the proposed approach of allocating partial Firm Access Quantities. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

EirGrid proposed an approach where a generator cannot be firm for the total Maximum Export Capacity (MEC) and that partial Firm Access in blocks of 20 MW will be considered

Iberdrola Renewables Ireland agrees with the allocation of partial FAQs. However, we would like to understand how the 20MW was determined and also how it will work in practice. For example, we assume if a site has a MEC of 15MW that it will still be given firm access.

This uncertainty leads to a couple of further clarification questions. We assume the Scheduled FAQ offer will contain information on the quantity allocated. However, we would like clarity as to whether this will represent the full FAQ or if is it possible that it will be partial. We also assume it will indicate if a site is entitled to get partial firm access, but again, this is not clear. We are also unclear as to the process of informing generators of the timeline of the allocation of full firm access quantities.

In summary, while it is very positive that developers will receive a Scheduled FAQ offer we need certainty on how much access we will receive and by when, in addition to the timeline associated with additional FAQ being allocated to us. This will help developers plan more effectively and to better understand the investment implications.

Stage of development

Question 4/ *Comments are invited from respondents on the proposed approach of allocating Firm Access to generators once they reach committed project phase (progress beyond Consents Issue Date). Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

EirGrid has proposed an approach to allocate firm access to committed projects beyond the consents issue date.

Developers need to understand when they will receive firm access as early as possible in the process. While we understand the concerns raised about hoarding of firm access rights, large scale investment projects still require certainty and should be made aware of the potential ability to gain firm access on their investment early in the process. Without this certainty, investors will not be aware if they will be compensated when dispatched down which is a significant risk outside of the control of the developer. In order to achieve the targets that must be achieved by 2030 and beyond, Ireland needs to incentivise investment from different sources and developers. There is also a need for Ireland to place itself competitively against other jurisdictions in terms of compensation and revenue generation regimes to incentivise further investment from globally positioned developers.

The objective of firm access is to provide investor confidence while minimising costs to consumers. To achieve this, the process must ensure that developers are allocated firm access prior to gaining a route to market, whether that be through an auction (RESS/ORESS) or a corporate power purchase agreement. If this is not provided, there is a cost of risk that will be reflected in prices which will in turn be seen by consumers. EirGrid and the SEM Committee therefore need to agree a method that will allow developers to understand allocated firm access as early as possible.

With respect to offshore, we are not convinced that the proposed approach will work or indeed if the same approach can be taken for both onshore and offshore. Any allocation of firm access to projects with planning consent or with a Grid Connection Assessment (GCA) may be sufficient for ORESS 1 projects. However due to the lack of clarity around the Phase 2 regime for offshore generators and the enduring regime thereafter, any allocation of firm access to projects with planning consent or with a GCA may not work for ORESS 2 projects.

In addition to the points we have raised above, we are also in agreement with the issues raised in the WEI response for question 4.

Question 5/ *Comments are invited from respondents on the inclusion of a longstop date with awarded FAQs. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:
The SEM Committee noted that concerns around projects being assigned and holding Firm Access rights which do not connect could potentially be alleviated by introducing a long stop date.

Iberdrola Renewables Ireland supports the proposal for a long stop date. We believe such an approach would make available additional firm access rights. To avoid confusion however, we suggest this date should be defined differently to the longstop date provided in a grid offer. We would also ask that further consideration is given by EirGrid/SEM Committee as to how this date would be evaluated.

Batteries and other service providers

Question 6/ *Comments are invited from respondents on the proposed approach of treating batteries and other service providers as outside the scope of the Firm Access methodology. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:
[EirGrid proposes that for the purposes of the firm access methodology, firm access for service providers is outside scope.] [Delete this sentence? – not needed?]

Iberdrola Renewables Ireland supports the points raised in the response provided by ESI. Batteries and other service providers need to be considered within the firm access methodology. We believe that storage projects should also be considered alongside ATRs in terms of determining the Scheduled FAQ date as storage can alleviate constraints and do not impact them adversely.

Maximum export capacity floor

Question 7/ *Comments are invited from respondents on the proposed approach of having a MEC "floor" of 1 MW. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:
Iberdrola Renewables Ireland agrees with having an MEC floor and refers to the comments made in the WEI response.

Allocation frequency

Question 8/ *Comments are invited from respondents on the Annual Review process. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:
EirGrid proposes that Firm Access will be allocated in the form of an Annual Review process with assessments made in each Annual Review. This is something that Iberdrola Renewables Ireland welcomes. This should mean that developers

get certainty and firm access as early as possible. However, as highlighted in the WEI response, more information as to the timing of the Annual Review would be welcome. The Annual Review and allocation of firm access must be at a point when developers can take it into account when developing RESS/ORESS/CPPA prices.

Firm threshold

Question 9/ *Comments are invited from respondents on the Firm Threshold. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

EirGrid describes a firm access test for renewable energy sources which will consider a minimum level of acceptable constraints. The firm threshold is the threshold at which the maximum level of acceptable constraints for a network area is met in a year of analysis. However, FAQs are only scheduled where granting FAQs to a connected generator would not bring the expected level of constraints above the threshold.

While we understand the intent of Eirgrid's approach, Iberdrola Renewables has some concerns which we outline below:

- The consultation does not describe what the threshold will be or how it will be calculated. EirGrid appears to suggest locational differences and also that the threshold can change year on year. However, the consultation does not explain how these differences will be derived, or the basis for any differences. Without further information, it is not possible to comment on the proposal or to analyse or consider the impact. We suggest that the SEM Committee consults on the proposed methodology as soon as possible and that responses to that consultation are considered before the firm access methodology is finalised. As key stakeholders, developers and the SEM Committee should have sight and the opportunity to comment on such a critical element of the proposed firm access policy.

- In the absence of more detailed information, it is our understanding that different thresholds across the country will form part of the proposal. We believe that it would make sense to have a higher threshold in areas where EirGrid does not have sufficient ATRs planned. However, we are not clear how the different thresholds will be developed.

We would welcome more information on the points outlined above.

Order of Allocation

Question 10/ *Comments are invited from interested parties on the approach of First to commit – first to be Firm. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

Iberdrola Renewables Ireland agrees in principle with the approach of first to commit – first to be firm but we have raised several points under question 4 related to this approach. We believe some further consideration may be needed to ensure that all onshore and offshore sites have clarity in relation to the Scheduled FAQ offer before any auctions and before any CPPAs are finalised.

We would like to understand how the 'first to commit- first to be firm' proposal will be managed where there are existing generators. In particular we would like further clarification as to whether or not this means that, by default, existing non-firm generators will get firm access first. This could further disadvantage new/repowering renewables projects from the current position where they do not get firm access and are dispatched down first. If existing non-firm generators with priority dispatch are given access first, this could result in a distortion with new generators being further disadvantaged. It is worth noting that new and repowered sites will naturally be more efficient in operation and therefore economic overall and therefore should be incentivised. We would therefore request clarity around this, and suggest it might be useful for EirGrid to develop some scenarios or schemes which describe various situations in more detail.

We would like to highlight one particular statement in EirGrid's proposal which notes '*Projects which progress beyond Consents Issue Date are said to have reached committed project phase, these committed projects are made firm until constraints increase beyond the Firm Threshold*.' We would ask for clarity on this point and if this means it is possible for a project to lose firm access in circumstances where constraints in a region increase beyond the Firm Threshold. We do not believe this is what is intended by the proposal, however, further clarification would be welcome.

Transmission Development Plan basis

Question 11/ *Comments are invited from respondents on the use of the Transmission Development Plan as part of the Firm Access methodology. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

EirGrid proposes that any forward-looking assessment to determine Firm Access dates for Scheduled FAQs is based on the latest EirGrid Transmission Development Plan (TDP). Reinforcements in the plan and their expected completion dates are considered as part of the process to see if, and when, the capacity in an area will increase above the Firm Threshold.

We agree with the use of the TDP as this should contain information on every project. However, we note that EirGrid publishes a more frequent Network Delivery Portfolio (NDP) which is likely to contain more up to date information. We believe that the most up to date publicly available information should be used as part of the Firm Access methodology.

In addition to the points we have raised in our response to Q11, we are also in support of the points raised by WEI in their response. We agree that EirGrid needs to consider all sources of information including timelines for addressing known system needs, such as those identified in the Tomorrow's Energy Scenarios (TES) System Needs Assessment and the next iteration of the Shaping our Electricity Future (SOEF) roadmap.

We refer again to our comments in relation to ATRs under question 1. The planning and delivery of ATRs is of considerable importance to the achievement of the 2030 RES-E targets. EirGrid needs to be incentivised to deliver ATRs and to identify appropriate ATRs that will incentivise investment across the country. We believe the proposal by EirGrid to provide locational signals is flawed and as a consequence will only incentivise investment in limited parts of the country. If EirGrid does not commit to ATRs in all areas that require capacity, there is a risk that existing generators will be disadvantaged. By limiting investment to certain areas, we believe this will result in unintended consequences such as increased boundary constraints.

Look back and look forward approach

Question 12/ *Comments are invited from respondents on the proposed look-back and look-forward approach, and the interaction between these steps. Please provide reasons and rationale for any views provided.*

Iberdrola Renewables Response:

EirGrid proposed that at a high level the new methodology would be composed of two steps: a look back and look forward. Existing generators in areas with capacity will be granted firm access, whereas developers in areas where the TDP will create future capacity will be allocated a set date for firm access. The look forward step provides a locational signal for future new capacity.

We would again refer to our response to Question 1 and our concerns in relation to the use of locational signals. We do understand the challenges that EirGrid face, however we question the appropriateness of the TSO influencing where investment in new generation development occurs.

Delivery incentives

Question 13/ *Comments are invited from interested parties on the interaction of delivery incentives with the proposed Firm Access methodology. Please provide rationale to support these views.*

Iberdrola Renewables Response:

The SEM Committee notes that there can be a gap between the estimated delivery date and actual completion date of system reinforcement works as evidenced in the TDP. The costs incurred due to any such delays are reflected through imperfection charges, with these costs ultimately lying with the consumer. It is important that effective delivery incentives are placed on the TSO to maintain downward pressure on these costs.

We agree with EirGrid's proposal. While we understand the SEM Committee's concerns, as described in our response to Question 1 we do not believe that generators' access to FAQs should be affected by external factors. We would argue that the existence of time bound firm access dates will incentivise EirGrid to minimise delays. However, we do agree that there must be adequate delivery incentives which are separate to the proposed Firm Access methodology.

Question 14/ *Views are invited from interested parties on how the TSO should be incentivised to alleviate constraints. Please provide supporting rationale for these views.*

Iberdrola Renewables Response:

The consultation paper states that the objectives of the Firm Access Methodology appear aligned with EirGrid's PR5 renewable generation and planning performance incentives. The consultation also suggests that the imperfections and constraints performance incentive incentivise EirGrid to develop a methodology that supports investor confidence without resulting in excessive risk of increased constraints costs. Iberdrola Renewables has a number of suggestions as to how to improve the incentives and to align with the objectives of the firm access methodology which we expand on below.

A PR5 incentive related to Constraints, Imperfection & Dispatch Down quotes a renewable dispatch down percentage target below 5% and not above 8%. Under Article 13 of the Clean Energy Package, TSOs must ensure '*…limited redispatching where the transmission system operator or distribution system operator is able to demonstrate in a transparent way that doing so is more economically efficient and does not exceed 5 % of the annual generated electricity in installations which use renewable energy sources…*'. Therefore, dispatch down should not be greater than 5%. If EirGrid is permitted through the PR5 incentives to have a dispatch down percentage target of '*..not above 8%*' this does not align with the Regulation. Consequently, it stands to reason that, EirGrid needs to be incentivised to reduce dispatch down to below 5%.

We do not believe that EirGrid should issue locational signals in areas of high demand which already have large investment and developments both onshore and offshore, or to ignore wind rich unclogged west and south coasts. This overlooks the opportunities to harness Ireland's natural resources and again, puts at risk achieving the RES-E target of 80%. We do not believe that the current incentives are specific enough to incentivise EirGrid to proactively reduce constraints and to futureproof the system.

With regard to a potential Firm Access incentive, we believe a specific incentive is required. This would merit more discussion but potentially there could be an incentive that would incentivise EirGrid to provide every existing project without firm access and every new renewable (and storage when applicable) project with a specific Scheduled FAQ date and to ensure that FAQ is given on that set date, regardless of any externalities.

Independent assurance

Question 15/ *Comments are invited from respondents on the need for independent assurance around the Firm Access process. Please provide rationale to support these views.*

Iberdrola Renewables Response:

Iberdrola Renewables Ireland agrees that there is need for independent assurance around Firm Access process. This should include all aspects of the process including the threshold methodology, the allocating of firm access and the development of ATRs in response to generators' plans. As ATRs are proposed to be central to the operation of the process, there is a need to ensure accountability and independent assurance that all necessary ATRs have been identified, are being progressed, and have achievable completion dates.

Other

Question 16/ *General comments are invited from interested parties on whether they agree with EirGrid's proposed Firm Access methodology. Should a party disagree with EirGrid's approach, please provide reasons and rationale for this.*

Iberdrola Renewables Response:

Iberdrola Renewables Ireland welcomes the progress made to date in developing a firm access methodology. Gaining firm access is critically important to new and repowering renewable generators as the SEM Committee has previously decided that these generators will not have priority dispatch and that they will be dispatched down first over generators with priority dispatch. To ensure they are not disadvantaged, a robust firm access process is required.

We have suggested a number of areas where we believe the methodology can be improved. We are concerned about the 'locational signals' that are to be issued and have raised points on this. We also do not have enough information on the firm threshold methodology to determine whether we agree with the proposed methodology or not. We also request that a follow-on consultation is required and that the firm access policy only be introduced after all stakeholders have a fair opportunity to comment on all aspects of the process.

Question 17/ *Suggestions and/or alternative approaches are invited from interested parties on EirGrid's proposal. Please provide rationale to support this.*

Iberdrola Renewables Response:

We agree in principle with the approach but, as stated earlier, we believe more needs to be done around the development and delivery of appropriate ATRs. As highlighted earlier, we are also concerned about the locational signals and we do not have enough information on the threshold methodology to develop or provide an informed position on this.

Question 18/ *Comments are invited from interested parties on the benefit of providing firm access to connected legacy generation in Ireland which currently have non-firm access. Should legacy non firm generators be considered in any new firm access methodology. Please provide rationale to support this.*

Iberdrola Renewables Response:

As described earlier, a critical issue for new or repowering generators is that they will not have priority dispatch and that the SEM Committee has decided that they will be dispatched down first over existing generators with priority dispatch. This needs to be rectified and new/repowering renewable generators must not be disadvantaged. Incentivising investment must be the priority given the imminent 2030 targets that must be met. The Regulation is clear in that renewable generation must be dispatched down in limited circumstances and as a last resort. As required by Article 13, renewable generators must be compensated.

Question 19/ *Comments are invited from respondents on the proposed methodology in relation to the equivalent approach taken in Northern Ireland. Do respondents have any views on the interactions and differences between these different approaches.*

Iberdrola Renewables Response:

Iberdrola Renewables Ireland supports RenewableNI's response to this question. We believe there should be consistency in the approach in both jurisdictions and we would welcome the consideration of a similar approach in Northern Ireland.