



SEM Committee, Commission for Regulation of Utilities,
The Exchange, Belgard Square North,
Tallaght, Dublin D24 PXW0

Emailed to: electricityconnectionpolicy@cru.ie.

8th November 2022

EDF Renewables Response to the SEMC's Firm Access Methodology in Ireland Assessment Consultation

Dear Firm Access Team,

EDF Renewables (EDFR) Ireland is part of one of the world's largest electricity companies and our investment and innovation in renewable energy projects is bringing down costs for consumers and delivering significant benefits for communities. EDFR Ireland's team has a wealth of experience in bringing complex development projects to fruition, across onshore and offshore wind, solar PV and battery storage technology, and is supported by more than 300 colleagues in the UK.

In 2020 we acquired 50% of Codling Wind Park, a major offshore wind farm which will be located off the coast of Co. Wicklow, with a dedicated team who have begun developing the project, and 100% of Wexford Solar, which includes eight solar projects across Ireland. In total we have an Irish onshore development pipeline of almost 1GW. We have constructed and energised three of the first utility-scale solar farms in Ireland in Wexford and Kilkenny, and have announced five new onshore wind projects in the past two years. We continue to assess M&A and JV opportunities, and are actively looking at battery co-location options for all of our renewables projects.

EDFR welcomes the opportunity to engage with the SEMC and to respond to this consultation. We welcome the accelerated pace at which the Government is moving, to ensure that Ireland will be enabled to achieve national energy target of 80% renewable electricity by 2030. That includes the generation of 7 GW of electricity from offshore wind, 8 GW from onshore wind, and 5.5 GW from solar, as set out in the Programme for Government and the Sectoral Emissions Ceilings. We are responding to the consultation questions that are most relevant to our activities and have set out our answers in our submission below.

We would like to thank the SEMC 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.

Yours sincerely,

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Ryanne Burges
EDF Renewables Director, Offshore and Ireland



Answers to the Questions

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

We welcome the proposed approach of a binding firm date for Firm Access being provided to projects and would welcome the removal of the link between Firm Access and specific Associated Transmission Reinforcements (ATRs). This places the risk of grid reinforcement delivery on the party best placed to manage it. Once Firm Access is granted this should be on a permanent basis. It is also important, however, that reasonable development timelines are considered for associated reinforcements when determining time-bound Firm Access dates. We would recommend ambitious timelines and incentivisation for EirGrid to deliver on these in a timely manner, with appropriate regulatory control and oversight.

- 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.**

EirGrid's performance record shows that many ATRs have not been delivered as per original project schedules, with substantial delays to ATR completion in many cases. We acknowledge that challenges arise on major ATR projects in terms of resourcing and delivery, however we feel it is important that the delivery of these projects would be both ambitious and more reliably within baseline schedules.

In our view, it is the responsibility of the Regulatory Authorities to control, manage and oversee EirGrid's commitment and delivery of ATR projects and to work together to resolve issues delaying project delivery (such as resourcing, approval processes, funding), where arising. We therefore recommend that the SEM Committee consider these points in their decision following this consultation.

- 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.**

EDFR agrees with the proposed approach of allocating partial Firm Access Quantities (FAQs), provided that it is in reasonable sized blocks, as suggested in the paper (i.e., 20MW or so). In this way, large projects such as offshore, which are critical to helping to meet Ireland RES-E and decarbonising targets, will not have to wait many years for a reinforcement date to bring constraints below a certain threshold. Partial Firm Access should also be aligned with SEMC policy on compensation for dispatch down with Firm Access quantities eligible for compensation.



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.

EDFR agrees with the proposed approach of allocating Firm Access to generators once they reach committed project phase (progress beyond Consents Issue Date). In our view, it is essential that certainty is provided earlier in the project timeframe, ideally before RESS auction bidding or securing a CPPA and at the latest, once a project has secured RESS or a CPPA, as this information is needed to allow accurate price formation. These prices will be locked in for the period of the RESS or CPPA support.

If Firm Access certainty is only provided when projects are already connected, this would place significant financial risk and revenue uncertainty on projects, as constraint assumptions could be subject to considerable change in the multiple year time period from RESS auction, or entering a CPPA, to securing financing and build out of the project. This issue is even more pronounced for offshore wind farms which have longer build times and timelines between the ORESS auction and energisation. At the time of connection, there is no way for projects to mitigate this price risk. We would welcome clarification on why the 20 MW figure was chosen.

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.

EDFR broadly agrees with the proposed approach of the inclusion of a longstop date with awarded FAQs, as it recognises both the need to ensure that Firm Access is meaningful and the need to prevent the hoarding of Firm Access capacity. This would ensure that EirGrid have more confidence that these projects will deliver, that their Firm Access capacity will be used, while also protecting the financial commitments that developers have made.

We would, however, caution that the longstop date may create a significant project risk, with no route to mitigate. We would therefore recommend that the SEMC develops and implements a procedure for extensions to longstop dates for project delays that are outside the developer's control. An example of this type of delay might include force majeure.

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.

While EDFR accepts that batteries are outside the scope of this methodology, on grounds of time and resource, we would urge the SEMC to undertake an urgent further assessment of how to deal with batteries and other service providers. We believe that installing batteries has the potential to make the overall system more robust and more prepared to accept additional renewable generation. We support the installation of batteries because they can facilitate the storage of the renewably sourced electricity at times when there is an abundance of wind and sun, and then allow this energy to be released to the grid when it is needed. In this way, batteries



can enable renewables to be used to their full potential and therefore support the further reduction of our reliance on fossil fuels. If and when the decision is made to install batteries in Ireland, it will be crucial to ensure that these will have as firm an access as is possible.

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.

EDFR agrees with the proposed approach of having a MEC “floor” of 1 MW and would note that below 1 MW would generally be connected at the MV/LV distribution voltage. Given that it is a climate emergency, the TSO’s focus needs to be on projects that can deliver large volumes of renewable electricity and as quickly as possible. In future, there may be significant build out of generation at or below this level (particularly micro generation). This has the potential to erode Firm Access availability in areas where large scale renewable generators are planning to connect. This may have an impact on different areas of the grid, and we would recommend that EirGrid considers this impact.

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

In our view the proposals in relation to the Annual Review process seem reasonable, provided that the first round takes place before ORESS 1 and RESS 3. We would welcome clarity on the timelines for annual reviews. We further welcome confirmation that firm access will be granted on a permanent basis and cannot change based on future reviews.

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

EDFR agrees with the Firm Threshold process, provided the threshold is reasonable. It will be extremely important for industry to know what this level will be, the detail of the methodology for how firm access is allocated and all the input assumptions to the model published. We would welcome more detail on the mechanism for calculation and on whether it will be tied to ECP constraints analysis. In our view this issue potentially requires its own separate consultation.

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.

In our view the proposals in relation to the approach of First to commit - first to be Firm seem reasonable, given the urgent need to progress renewable projects as quickly as possible.



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.

We believe that Firm Access should be based off the appropriate timeline for addressing known system needs, such as those identified in the TES System Needs Assessment and Shaping our Electricity Future (SOEF). In our view, this should include an estimate for likely project solutions to come through steps 1-3 of the Grid Development Framework. This is important as information in the Transmission Development Plans (TDPs) can be years out of date by the time they are published, and the majority of early-stage projects do not make it into the TDP until they are at a later stage of progression. The SOEF roadmap should look at how the system can deliver 80% RES-E by 2030 and a net-zero power system beyond this, so therefore projects that will be completed beyond 2030 also need to be considered at this stage. This is important to provide the necessary investment signals to the onshore and offshore wind pipeline that the grid will be there to ensure we can meet the renewable capacity targets outlined in the new Climate Action Plan.

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

In EDFR's view, the look-back is needed immediately to address the existing issues with the grid and the look forward is needed ahead of ORESS 1 and RESS3. There are existing non-firm projects that had ATRs and Firm Access dates assigned but these have been missed as certain ATRs have not been delivered. We would propose that in the look back analysis that these projects should have the original ATR dates applied when determining a connected generators Firm Access year.

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.

Please refer to our answer to question 14.

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

In EDFR's view, the TSO should be allocated additional resourcing and funding to help with the internal workload which will in turn, help to alleviate the constraints.

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

Please refer to our answer to question 9, and to a lesser degree question 11.



- 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.**

EDFR are in general agreement with EirGrid's proposed Firm Access methodology.

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

EDFR is not responding to 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.**

In our view, given the long-needed move from the ATR process this should be covered in the, urgently needed, look back.

- 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.**

EDFR believes that a common approach is needed in order to prevent market distortions and distortions in renewable and grid build, and by consequence carbon emissions, national targets etc.