

## RenewableNI response to the SEM Committee's Consultation on Firm Access Methodology in Ireland

RenewableNI (RNI) is the voice for the renewable electricity industry in Northern Ireland. Through the development of policy, best practice, and public communications, we represent those engaged in wind, solar, and battery storage development. Our members make up a large majority of the renewable industry supply chain in Northern Ireland.

RNI welcomes the opportunity to respond to UR's consultation on proposed modification to the SEM Committee's consultation on Firm Access Methodology in Ireland.

### Policy Context

The UK Government has set in legislation a requirement for a 'net zero' economy by 2050. As the leader in decarbonisation, the power sector will have to achieve zero carbon first, with heat and transport expected to significantly electrify as the main way of cutting emissions. The International Energy Agency has stated that all advanced economies must achieve zero carbon power by 2035<sup>1</sup> and the UK Government has made a commitment to achieve this<sup>2</sup>.

Working in conjunction with Wind Energy Ireland, RNI is committed to driving policy to deliver zero carbon power on the island of Ireland by 2035. This can only be achieved if the necessary level of renewable generation and the required zero carbon system services, are facilitated by the electricity network.

### RenewableNI Comments on Q19

RenewableNI appreciates the opportunity to respond to SEMC's consultation on firm access in Ireland, and will focus on responding particularly to Q19 in the consultation document;

*Comments are invited from respondents on the need to consider this 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.*

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<sup>1</sup> Pg 20, *Net Zero by 2050*

<sup>2</sup> <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

In the first instance, RenewableNI would emphasize the need for NI to be included in a firm access methodology review in Ireland. In order to maintain the integrity of the SEM, it is crucial that there is a joined-up approach in place on the island of Ireland between NI and ROI. We note the current differences between the two approaches, and would emphasize that in order to have an effective market, similar approaches should be adopted North and South.

In order to facilitate this, it is important that SONI commits to updating the firm access connection policy in NI in a timely and effective manner so that any proposed changes to firm access policy can be reviewed and implemented in NI without delay.

When considering firm access for NI, we would also emphasize that the key objective of firm access is to provide investor confidence while minimizing the cost to consumers. This is best achieved if developers have certainty on firm access that they can use to inform their bids.

RNI would also endorse the arguments made in the WEI response to this consultation. We are of the view that a firm access policy in NI should be complimentary to the views expressed by WEI with regards to firm access in ROI. In turn, the approaches taken by EirGrid should align with approaches taken by SONI in this regard. We note that EirGrid are proposing ATRs using forecasted development, however this appears misaligned with NIE's "Flexibility First" outlined in RP7,<sup>3</sup> which takes a more "wait and see" approach. We would encourage all relevant parties to be informed of each other's policy approaches to ensure alignment. We would generally support the proposal for a time bound firm access date as this ensures investor confidence while minimizing costs to consumers and incentivizing the improvement of ATR timelines. Similarly, we would support granular partial FAQ increases, and would welcome further information on how this would be allocated and considered.

We would also urge the SEM Committee to ensure that a firm access policy is aligned with SEMC decisions on compensation for dispatch down and Articles 12 and 13 of the Clean Energy Package, otherwise the policy will not be effective in delivering investor confidence or lowering the cost of renewable deployment.

Overall, we would emphasize the need for NI to be included in a firm access methodology review, and for this to be a consistent approach across the SEM. We support the points made by WEI and would urge the SEMC to consider all factors at play to ensure that a firm access policy supports investor confidence and incentivises improvements as well as minimising costs to consumers.

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<sup>3</sup> [RP7-Stakeholder-Consultation \(1\).pdf](#)