

26 November 2021

Emailed to: info@eirgrid.com and consultations@esbnetworks.ie

RE: Joint TAO/TSO PR5 Incentive Multi-Year Balanced Scorecard 2022-2026

Wind Energy Ireland (WEI) welcomes the opportunity to engage with EirGrid and ESB Networks and provide feedback on the Joint TAO/TSO PR5 Incentive Multi-Year Balanced Scorecard 2022-2026.

WEI is the nation's largest renewable energy organisation with more than 150 members who have come together to plan, build, operate, and support the development of the country's chief renewable energy resource. We work to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future.

We would like to make the following comments in relation to the document.

Deployment of New Technology

WEI supports the deployment of new technologies where possible and where these may provide a more efficient and effective option to help deliver our RES-E targets and minimise dispatch down. As per our response to the Investment Planning & Delivery incentive consultation we believe the deployment of these technologies should be clearly linked to the implementation of the Shaping our Electricity Future roadmap and delivery of the Climate Action Plan targets for onshore and offshore wind. The appendix provided is too vague on detail for the rollout of new technologies such as dynamic line ratings for example. The plan calls for further analysis and rollout in 2023 and 2024 but this should be linked to plans in SOEF, and the projects outlined in the final roadmap, as well as additional measures that are needed to deliver 80% RES-E by 2030.

Project Initiation to CPP Agreed Phase

WEI welcomes the initiative to measure time taken from the issue of Indicative Programmes and CPPs by the TSO to reaching CPP agreed with the TAO in a calendar year. The initiative would benefit from calling out specific projects that are included in the TDP and SOEF Roadmap and

having specific targets for these in the relevant years that TAO and TSO could then be assessed against. We would also query as to how meeting as low as 50% of a target could be deemed “acceptable”, especially given this wouldn’t include projects that can be discounted from targets if they are deferred or delayed due to circumstances outside of the control of either the TSO or TAO. The number of projects that are chosen per year for the metric (25) should be increased to take into account all TDP projects, and more recent SOEF projects and new connection projects.

Joint Process Improvement

Construction and energisation of contestably built assets will be a key component of meeting our renewable energy targets. While WEI acknowledges that there has been improvement in the design and construction review processes carried out by the TSO, DSO, and TAO, there are still areas for improvement. One particular area of concern is the parallel approach taken to design and construction review by the TSO and TAO on TSO connected projects. Our members have experience of numerous projects where multiple design and snag item logs are developed which can contain conflicts and contradictions leading to design and construction delays. The current process can also result in post construction design reviews even though the connecting party had been led to believe that all logs had been closed. It is WEI’s view that the TSO and TAO should be incentivised to have a common design and construction quality review process and eliminate the potential for conflicts and contradictions which result in time delays and cost overruns.

Asset and Programme Data Exchange

In relation to “Demonstration of acceptable Asset and Programme Data Exchange performance”, we would ask for more information on this. A clear data exchange strategy is needed to facilitate energisation of connection assets. It is also important to know the asset health on the SO side at the point of connection.

Conclusion

We thank EirGrid and ESB Networks for offering us the opportunity to provide feedback on the Joint TAO/TSO PR5 Incentive Multi-Year Balanced Scorecard 2022-2026. We are available to discuss any of these points at your convenience and we look forward to further engagement.

Yours sincerely,



A handwritten signature in black ink, appearing to read "Bobby Smith", is written above a thin horizontal line.

Bobby Smith
Senior Policy Advisor
Wind Energy Ireland