

Wind Energy Ireland,  
Sycamore House, Millennium Park,  
Osberstown, Naas,  
Co. Kildare.

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Emailed to: [info@eirgrid.com](mailto:info@eirgrid.com) and [consultations@esbnetworks.ie](mailto:consultations@esbnetworks.ie)

## RE: Annual Transmission Performance Report 2020

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 thank EirGrid and ESB Networks for offering the opportunity to respond to this consultation on the Annual Transmission Performance Report (the Report) for 2020 and we would like to make the following comments in relation to the report.

### Transmission Delivery

We have put forward detailed comments on this area in our response to the TSO/TAO Investment Planning and Delivery Report 2020 consultation.

One query we would have here is whether the audit reports on which the performance incentive for transmission delivery for both the TAO and TSO can be made public? A high-level summary is provided on the incentive received but more transparency is needed as it does not appear much of the underlying information is available to industry at this stage.

### Transmission Outages

Outages of the transmission network have a major impact on the dispatch down of wind generation. We appreciate that the outage programme and planned activities were impacted due to Covid-19 but there appears to be no monitoring and reporting on the impact of the outages on the dispatch down of renewable generation i.e., how many of the 9,842 actual outage days in 2020 resulted in the dispatch down of wind generation and what was the impact on lost renewable energy and increased CO2 emissions? We would request significantly more monitoring and reporting on outages and their impact. We believe that this is required under

the EU directives for the calculation of dispatch down by member states. EirGrid are collecting the information for constraint and curtailment events, but it does not appear that the dispatch down from outages related events is being properly reported.

With the limited information provided it is difficult to see either the impact of outages on the dispatch down of renewable generation or how EirGrid and ESB Networks have actively sought to reduce outage days. Critical to the management of energy is monitoring and reporting. As well as helping to measure actual levels of lost renewable energy, it will also show the positive impact of improvements to the systems and processes used.

### **Dispatch Down**

Dispatch down levels were very high in 2020 at 11.4% of the total available wind energy, according to the Report. Of that, 46.60% was related to curtailment volumes and while there is some detail provided on mitigation of operational constraints, there is little information provided in the Report on how the TSO attempted to address the key drivers for curtailment i.e., SNSP and Min Gen. Specifically, there appears to be almost no monitoring, reporting analysis or discussion on mitigation measures related to the minimum conventional generation level. This is very important information for industry to see. Similar to outages, there seems to be no consideration of the emissions impacts of this lost renewable generation.

There is also very little detail on performance in relation to network constraints, which caused more than half of the renewable dispatch down. More transparency and information is needed on how EirGrid/ESB Networks intend to reduce these constraints through measures as such as network reinforcement and/or smart grid solutions in the short term.

### **Wind Dispatch Tool**

There appears to be no information on the performance of EirGrid's Wind Dispatch Tool (WDT) in the Report. WEI has had discussions with the SO and made submissions on concerns that the WDT needs to be updated to more fairly allocate dispatch down across renewable projects. WEI would request that it is a priority for EirGrid to start making improvement to the tool, even on an interim basis, rather than wait until the more complex requirements of the Clean Energy Package are finalised, particularly given the very uncertain timeline for this.

## New Connections

We appreciate that 2020 was a difficult year for normal activities due to Covid-19 impacts and we recognise the efforts of the TSO and TAO to continue to connect up to 203 MW of windfarm generation customers despite the issues faced.

We appreciate the detail provided on the number of connection offers/modifications issued and executed but we feel the report would benefit from more detail showing how efficiency improvements were targeted. For example, it would be useful to understand how performance in 2020 compared to previous years in terms of the connection offer process and turnaround times for connection offers and modifications.

Finally, we would like to thank EirGrid and ESB Networks for the opportunity to engage with you on this report and we are available to discuss any of the points raised above in more detail.

Best Regards,

*Dave Linehan*

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Dave Linehan  
Head of Research, Wind Energy Ireland