

23rd July 2018

Project Manager

North Connacht 110kV Project
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Ireland

Western Development Commission (WDC) response on Step 3 of the North Connacht/EirGrid Capital Project 0816

The Western Development Commission (WDC) welcomes this opportunity to make a short submission on Step 3 of the proposed 110kV North Connacht Project.

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region¹. The WDC seeks to ensure that government policy and its implementation reflects the needs of the Region across such areas as infrastructure, natural resources, industrial and rural development. Because quality infrastructure is important to regional development the WDC monitors infrastructure planning and investment across a range of infrastructures and makes submissions where appropriate.

The WDC regards the provision of quality electricity transmission and distribution networks as important elements of the infrastructure required to underpin the economic development of the region. While the WDC does not express any preference as to the route option or type of infrastructure to be used in the North Connacht project we would like to comment on the capacity of the proposed project and raise our concerns that, while this proposed project will meet the immediate generation connection requirements, it will provide little, if any, additional capacity for further renewable generation in the area. In other words, this project seems to be planned only to meet current *committed* connections and does not appear to have capacity beyond this.

We are also concerned that the “Step 2 – Options Report of Grid Development Framework North Connacht Project” only considered 110kV options with little discussion or justification of the exclusion of other higher capacity potential solutions, the options for them and the benefits they might bring both in terms of the grid infrastructure or future proofing the investment to ensure that it will meet the needs of the Region in the medium and longer term.

¹ Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

The report only makes very brief reference to 220kV and 400kV EHV options:

Whilst such EHV infrastructure would meet the need for the level of generation currently expected, and in addition would provide a level of future-proofing for further increases in generation, no such further future generation has committed to connecting in the area. In the absence of such commitment, EirGrid has opted to focus on optimising the use of the existing 110 kV electricity infrastructure to minimise the need for new infrastructure. Pg 13

While it justifies the focus on the 110kV options as they would meet current commitments, it seems to recognize that additional generation would require a different investment at 220kV level. However, EirGrid has decided that the North Connacht project will be at 110kV although this only addresses the requirements for generation connections which are currently (in 2018) committed.

In addition to the proposed investment in new 110kV infrastructure from Moy to Tonroe or Srananagh, a significant amount of uprating of other transmission lines in the region will be required to meet the needs of the committed connections. This indicates that there is likely to be very limited opportunity for further uprating in future to meet any additional generation connection requirements (although it should be noted that no information is given on the potential for additional grid connection capacity).

While the WDC recognizes that it is important that investment is not made in excess infrastructure capacity, it is also important that such significant investment (with indicative capital costs of between €37m and €54m depending on the option selected) is future proofed so that it has the capacity to meet reasonable expectations for demand and generation connections in the medium and longer term

It is not an efficient use of resources to plan only for immediate, committed needs and to have no additional capacity for further connection to the network. It also means that if further connection is required, people in the region will again face uncertainty regarding transmission infrastructure development. Therefore while the cost of 110kV may be lower for immediate short term needs, and while it may appear simpler to plan for, the smaller scale investment is not likely not to be most efficient or economic solution in the long term.

Finally, while it is recognized the focus of the Step 2 Options report is to establish the technology options which will be considered in the Step 3 of the process, there is no reference in the consultation process to government policy in relation to the requirement for investment in the transmission system necessary to enable Ireland's transition to a low carbon energy future as outlined in White Paper "Ireland's Transition to a Low Carbon Energy Future 2015 – 2030". Nor does it refer to the other key government policies driving change over the next 20 years, including the most significant of these: *Project Ireland 2040*. This incorporates both the *National Development Plan (NDP)* which is the capital investment programme and the *National Planning Framework (NPF)*, which will also incorporate the *Regional Spatial and Economic Strategies (RSES)*.

While the RSES for the Northern and Western Region has not yet been drafted, the Issues Paper earlier this year noted that:

Energy has been identified as an opportunity across all LECP's, within the region, ranging from energy efficiency first, harnessing the energy resource through a variety of low carbon energy sources within the northern and western region, infrastructure development and the development of associated innovative technology. P21

This would indicate an intention to focus on the development of further renewable generation as part of the *Regional Spatial and Economic Strategy* for the Northern and Western Region and as a key element

in the *Project Ireland 2040* developments. Therefore it would be expected to influence infrastructure planning.

Finally, it should be noted that while previously the WDC did emphasize the importance of this project having sufficient capacity to meet potential demand in the North Connacht region (as noted in the Stakeholder section of the Step 2 Options Report) the main concern raised by the WDC related to the capacity of the proposed 110kV infrastructure to allow for further connection of generation, in particular of renewable generation, in the future. The WDC believes that that the small-scale grid infrastructure being proposed in the North Connacht Project could be a significant limiting factor on the development of renewable energy generation in the Western Region and limit the Region's options for maximizing the significant potential in the region for further renewable development.

We are pleased to have this opportunity to make a submission on this North Connacht project and welcome the stakeholder engagement we have had with EirGrid. Indeed the WDC is currently commissioning a short review of electricity transmission infrastructure in the Western Region in order to inform our understanding of the decisions made by EirGrid and to help us to provide better input to EirGrid in relation to its infrastructure investment decisions. This is expected to be completed by the end of September.

If you have any queries in relation to this submission or would like to discuss it further please do get in touch.

Yours sincerely

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