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8th November 2017

[By Email]

**Re: Submission to the *Draft National Planning Framework - Ireland 2040***

Dear Sir/Madam,

EirGrid Group welcomes the opportunity to make a submission on *Ireland 2040 – Our Plan: Draft National Planning Framework* and requests that this submission is taken into consideration in the finalisation of the *Framework*. EirGrid previously made a submission to *Ireland 2040 - Our Plan: Issues and Choices* dated 31<sup>st</sup> March 2017 in which the strategic issue of the future development of Ireland's electricity transmission grid was highlighted.

Since this submission, EirGrid (2017) has published its *Tomorrow's Energy Scenarios 2017: Planning our Energy Future*. This document brings together a wide range of factors which can influence the evolution of the electricity sector into a set of four discrete scenarios. These have been prepared in consultation with key stakeholders in the energy sector including Government departments. The scenarios show that electricity demand will likely increase significantly in the future, largely due to new data centres connecting, but also due to the electrification of the heating and transport sectors over time. Similarly, the electricity generation portfolio will continue to decarbonise, with increasing levels of renewables connecting to the system. The possible ranges for these changes are explored across EirGrid's four scenarios.

An increased spatial focus in the Framework and the identification of suitable locations at a national level for larger generation (i.e. renewable energy) and demand (i.e. data centres) centres would be of assistance in formulating energy scenarios into the future and in identifying the optimum grid development solutions. If it is the intention of the Framework not to have this level of spatial focus EirGrid requests that an appropriate context is set in the document to ensure that such development is directed to spatially suitable locations in the regional and local plans (e.g. a larger demand centre such as a data centre should be directed to spatially suitable locations to ensure efficient use of the existing transmission network).

The electricity transmission grid's importance in supporting our society and economy should not be understated. EirGrid values the inclusion of several provisions throughout the *draft Framework* to emphasise this, most notably in the Vision (Section 1.1), Themes

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and associated Policy Objectives (Section 6.5 and 7.4) and Strategic Outcomes (Section 9.1).

We note a particular emphasis on connectivity, particularly international connectivity, where certain key infrastructural projects are mentioned by name. Interconnecting would assure Ireland's direct access to the EU Single Energy Market. It would also strengthen competition and security of supply in Ireland and create opportunities to import and export electricity. An explicit objective championing the Integrated Single Electricity Market (I-SEM) as a key priority for Ireland would also be welcomed.

All inclusions which support a safe, secure and reliable supply of electricity are needed for EirGrid to successfully implement its *Grid Development Strategy - Your Grid, Your Tomorrow (2017)*, which is imperative to meeting national targets for electricity generation, climate change targets, and security of energy supplies. They will also be crucial in setting the context for the regional development strategies and in turn county and local area plans. It is asked that none of the current inclusions be weakened or removed when finalising the *Framework* without consultation with EirGrid.

National Policy Objective 49<sup>1</sup> is a specific inclusion in relation to EirGrid's function. In isolation this objective is robust in strengthening the transmission network. However, EirGrid is concerned that within the context of its overall theme *Section 7.0 Working with Our Neighbours* it may be construed as only being relevant for international transboundary projects, for example the North South Interconnector or the Celtic Interconnector.

While support for the transmission network is inherent throughout the *draft Framework*, it is considered that an additional and specific policy objective be included under *Section 8.0 Realising Our Sustainable Future* which would support the safe, secure and reliable supply of electricity. It is considered that the framing of an additional policy objective within this theme would ensure the role of the transmission network in realising our sustainable future. An additional policy objective under this theme would also assist in achieving the *National Strategic Outcome: Transition to Sustainable Energy* to 'reinforce the transmission network to facilitate planned growth and the transfer of renewable energy generated to the major demand centres', as set out in *Section 9.0 Investing in Ireland 2040 – Implementation*.

The framing of objectives such as this within themes is important as they begin to be interpreted by the new regional authorities and in turn local authorities. For example a local authority not involved directly in international energy connections may not consider Section 7.0 and the need to support transmission networks. It may be, depending on the circumstances, EirGrid will use new and emerging technologies to get more from existing grid infrastructure. In other words, we will do more with the existing grid and make it work harder before we build new transmission infrastructure.

In Section 9.0 Investing in Ireland 2040 – Implementation, the *draft Framework* sets out strategic outcomes including *Transition to Sustainable Energy* which is most relevant to EirGrid. For clarity it is suggested that EirGrid's function of transmission system operator

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<sup>1</sup> National Policy Objective 49: Strengthen all-island energy infrastructure and interconnection capacity to enhance security of electricity supply.



under *Article 8 (1) (a) of European Communities (Internal Market in Electricity) Regulations, 2000 (SI No. 445/2000)* is referenced here.

The *Framework* also identifies the 'strategic development of a new form of energy grid' – it should be noted, as mentioned previously, that all options will be explored in the strategic development of the grid and that this may include reusing or adding to the existing grid technology.

Section 9.0 makes reference to a 'sub –sea ring around Ireland'. EirGrid (as referenced throughout the *Framework*) is currently studying options on the Celtic Interconnector, an interconnection within the EU via France. It is assumed this is what is being referred to, however, for clarity it is noted this does not comprise a 'ring' around Ireland.

Generally, and notwithstanding the infographic (pg. 12), it is unclear whether and/or how the various Government (and State Agency) policies and strategy documents have been considered in the preparation of the *draft Framework*, and how they have informed the vision, themes and strategic outcomes. In particular, a number of such documents – not least EirGrid's (2017) *Grid Development Strategy*, its *Tomorrow's Energy Scenarios* and the White Paper on Energy - include a longer term visionary approach and strategy which is consistent with the approach of the *Framework*. It is the case that different and separate departmental policies and strategies may actually integrate around long-term visionary themes – for example, renewables, grid development, environmental/climate change, and job creation/economic development. Having regard to all this, it is considered that a section should be included in the *Framework* setting out how Government and State Agency policy and strategy documents have informed the *Framework*, and how they have been considered in a holistic and integrated way to inform subsequent themes. This gives a clear policy-led status to the *Framework*, which will prove invaluable as it informs the strategies and plans at regional and local levels.

Given that the policy context covers a wide-ranging cross-departmental extent, EirGrid suggest that the Department convenes a working group to inform and/or input into the integrated policy and strategy context, and indeed to input into how this informs the subsequent themes and content of the *Framework*. EirGrid would be delighted to participate in any such working group. This will ensure an appropriate cross-sectoral contribution to the *National Planning Framework*.

Should you have any comments in regard of this submission please contact the undersigned. EirGrid once more welcomes the opportunity to participate in the making of the *National Planning Framework* and looks forward to further engagement.

Yours sincerely,

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**Sinead O'Malley**  
**Principal Planner**





## References

Department of Communications, Energy and Natural Resources (2015). *Ireland's Transition to a Low Carbon Energy Future 2015-2030*. Dublin: DCENR. Available Online.

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