



DP ENERGY

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Emailed to: electricityconnectionpolicy@cru.ie

Re: Proposed Decision paper (CRU/21/112) on proposals for the next stage of processing for Phase 1 offshore grid connection applications

Dear Mr. O'Neill,

DP Energy welcomes the opportunity to respond to the Commission for Regulation of Utilities (CRU) consultation on the Proposed Decision paper (CRU/21/112) on proposals for the next stage of processing for Phase 1 offshore grid connection applications.

Cork-based renewable energy developer, DP Energy, and Iberdrola Renewables Ireland, part of Iberdrola, one of the world's largest utilities and leading wind energy producers, have a joint venture to develop three Irish offshore wind projects, with Iberdrola acquiring a 3 GW pipeline of offshore wind and a majority stake in DP Energy's Irish offshore business. The projects involved in the DP Energy-Iberdrola deal have been in development since 2016 and include the Inis Ealga Project Marine Energy Park off the coast of Co. Cork, and the Clarus Offshore Wind Farm off the coast of Co. Clare – both based on floating wind technology. Further development on the East coast, the Shelmalere Offshore Wind Farm, will be based on fixed foundation technology.

At least two of our three potential projects are expected to be operational between 2028 and 2030 and aim to significantly contribute to Ireland's Climate Action Plan targets. For this reason, we are providing a response to this consultation. Whilst these two projects do not fall under the Phase 1 category, we are working towards the same energisation target. We have already commenced relevant environmental surveys and engineering studies in order to support our pre-2030 project programmes. Similarly to the development of the Phase 1 projects, Phase 2 projects have specific requirements in the short term to help maintain project programmes and contribute to the Government ambition to deliver at least 5 GW of offshore wind by 2030.

DP Energy are members of Wind Energy Ireland, and we are fully supportive of their response on behalf of the post Phase 1 projects, attached to the end of this letter for ease of reference.

In addition, we would like to emphasise the need for early, meaningful engagement with Phase 2 projects.

The sequential approach and timelines relating to the GCA validity period will lead to delays of Phase 2 projects beyond the 2030 target. It is therefore essential that Phase 2 projects have some degree of certainty on their grid connection method as early as possible in 2022 (following the processing of Phase 1 GCAs). A balance must be achieved that ensures that the Phase 1 GCAs are safeguarded against any delays to the auction timelines and that the validity period is sufficient to maintain investor confidence, while at the same time, enabling competition for grid capacity at competitive node(s) from subsequent offshore project phases.

We echo the ask made by the Phase 1 participants in their consultation response for more extensive engagement from CRU and EirGrid before the final decision is made, in particular in relation to the more contentious items, including the validity of the Grid Connection Assessment. To facilitate these types of discussions, more open and transparent communication is greatly encouraged. Many of the themes raised within the consultation and its associated responses are applicable to both the Phase 1 and Phase 2 projects, and any workshops relating to same should be open to both parties (with the understandable exceptions of any events relating to project specific or commercially sensitive information).

Thank you for the opportunity to provide feedback on this consultation, and I would be happy to meet with you at any point to discuss this feedback.

Yours sincerely,

Sara Armstrong
On behalf of DP Energy

Wind Energy Ireland Post-Phase 1 projects comments to the CRU Proposed Decision (CRU/21/112) on Offshore Grid Connection Assessment – Phase 1 Projects

Phase 2 projects will be required if we are to achieve the 5GW target by 2030.

- Similarly to the development of the projects in Phase 1, Phase 2 projects have specific requirements in the short term to help maintain their project programmes and achieve pre-2030 energisation.
- Noting the TSO's recent launch of their 'Shaping our electricity future' Roadmap, EirGrid has identified areas on the grid which can support the 5GW target (including along the South and West coast). It is recommended that key stakeholders start to look beyond the Phase 1 projects and facilitate meaningful engagement in support of the 5GW target.

A key enabler to these project programmes includes the alignment on grid (including grid connection method and windfarm capacity or MEC)

- In support of pre-2030 project programmes, some Phase 2 projects have initiated environmental surveys and are also developing FEED for their respective developments. Certain environmental surveys can take a number of years to complete (for example, bird and mammal surveys) and are now becoming critical path items for these projects.
- Due to the ongoing uncertainty regarding future grid connection, several potential landfall sites and routes to potential substations have to be included, all at risk. Maintaining numerous options through the preliminary design stage is not a sustainable approach. Environmental and technical teams need to hone-in on the preferred option to inform the preparation of project EIAs.
- Finalising 'Phase 2 Criteria' and identifying those projects that will contribute to our 5GW 2030 target is urgently required.

Within this GCA consultation, the validity period proposed appears to suggest that Phase 2 projects may not secure alignment on grid until well after ORESS1 and perhaps the offer execution phase for Phase 1 projects.

- This sequential approach and subsequent timeline will lead to delays of Phase 2 projects beyond the 2030 horizon. Phase 2 projects are estimating at least 24-month environmental surveys plus 12 months for a planning decision). It is therefore essential that Phase 2 projects have some degree of certainty on their grid connection method **as early as possible in 2022 (following the processing of Phase 1 GCA's)** to allow developers lodge planning at the latest by mid-2024.
- Although it is acknowledged in the CRU's consultation that GCAs have been designed for Phase 1 and may not be required for Phase 2, alignment on connection methods (and an indication of costs) is required, in whatever format that may take.

The upcoming consultation on Phase 2 is welcomed, however at this point and in relation to this GCA consultation, it is recommended that the link between the Phase 1 GCA process and any subsequent Phase 2 process is dissolved.

- This will provide the opportunity to engage Phase 2 projects in a meaningful way, in support of our 2030 offshore wind target.
- This will also ensure that there is no commercial advantage for projects participating in both ORESS-1 and ORESS-2.