

15<sup>th</sup> July 2024

# Wind Energy Ireland Submission to the CRU Strategic Plan 2025–2027 Consultation

## 1 Introduction

Wind Energy Ireland (WEI) welcomes the opportunity to engage with the CRU and provide feedback on the CRU Strategic Plan 2025–2027 Consultation.

WEI is the nation's largest renewable energy organisation with more than 200 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 have the following comments in relation to the consultation questions.

### 1. What are your principal areas of engagement with the work of the CRU?

As a member association for the wind industry, WEI engages in all areas relevant to Wind Energy, including grid development and supporting technologies.

### 2. What specific activities of the CRU do you believe have brought most value to its stakeholders over the last three years?

WEI believe that the work that the CRU has done under priority areas 1) Ensure Security of Supply and 2) Drive a Low Carbon Future has been positive and outlined clear objectives. WEI believe that these priority areas and objectives remain relevant and should be present in the 2025-2027 Strategy Plan. WEI believe that the CRU's involvement in the Climate Action Plan is vital and must continue moving forward.

Key activities include:

- **Tariff Reviews and Price Controls:** The CRU's regular reviews and adjustments of tariffs for electricity and gas have helped protect consumers from volatile energy prices and ensured fair pricing.

- **Enhanced Customer Engagement:** Initiatives to improve customer service standards and address complaints efficiently have increased consumer satisfaction and trust in utility providers.
- **Vulnerable Customer Programs:** Support schemes for vulnerable customers, including protections against disconnections and targeted assistance programs, have provided critical support to those most in need.
- **Renewable Energy Support Scheme (RESS):** The CRU's role in facilitating the RESS has accelerated the development of renewable energy projects, contributing to Ireland's climate goals and increasing the share of renewables in the energy mix.
- **Grid Modernization and Integration:** The CRU's efforts to support the system operators to modernise the electricity grid and integrate renewable energy sources have improved grid stability and supported the transition to a low-carbon energy system.
- **Promotion of Energy Efficiency:** The CRU's initiatives to promote energy efficiency among consumers and businesses have reduced overall energy consumption and contributed to environmental sustainability.
- **Electricity Market Reform:** The CRU's work in the redesign and regulation of the Single Electricity Market (SEM) has enhanced market efficiency and competition, leading to better prices and services for consumers.

### 3. [What will be the most important/significant external opportunities for the CRU over the next 5-10 years that will require action during the period of the 2025-27 Strategy Statement?](#)

WEI would like to see the CRU's strategy align with the Price Review 6 Strategy Paper. With respect to energy, WEI believe that the three outcomes described in the PR6 Strategy Paper should be top priorities for the 2025 – 2027 Strategy:

- Decarbonised electricity
- Secure and resilient networks and supplies
- Empowered customers

We note that this strategy will capture an important time for Ireland in achieving its 2030 targets. The 2025 – 2027 strategy must focus on delivering on the 80% RES-E target, and to deliver on this, the strategy also needs to ensure that the CRU has the resources in place (people, processes, and tools) to deliver on 2030 targets and beyond.

Key Opportunities include:

- **Expansion of Renewable Energy Sources:** The continued development of wind, solar, and other renewable energy technologies present an opportunity for the CRU to support and regulate increased renewable energy capacity. This next strategy should not only consider what is required for achieving 2030 targets but begin considering what the CRU needs to do to continue towards a net zero power system post 2030.
- **Integration of Energy Storage Solutions:** Energy storage technologies have been rapidly advancing and are an essential piece of the puzzle. Advances in battery storage and other energy storage technologies can help address the intermittency of renewable energy sources, ensuring a stable and reliable supply.
- **Development of Smart Grids:** Investing in smart grid technologies can improve grid efficiency, reliability, and resilience. Smart grids enable better demand response, integration of distributed energy resources, and real-time monitoring and management.
- **Single Electricity Market (SEM) Enhancements:** Further enhancements to the SEM can improve market efficiency, competition, and consumer outcomes. Opportunities exist to refine market rules, integrate new technologies, and support the transition to a low-carbon economy. Now is the time to be considering what changes are required to support a market dominated by renewable energy.
- **European Energy Market Integration:** Greater integration with European energy markets can enhance energy security, reduce costs, and facilitate the sharing of renewable energy across borders. The CRU can play a key role in harmonizing regulations and fostering cross-border collaboration.

#### 4. [What will be the most important/significant external threats likely to impact on the CRU over the next 5-10 years that will require action during the period of the 2025 to 2027 Strategy?](#)

- **Growing levels of Dispatch Down:** The next strategy needs to consider the actions set out in the Climate Action Plan and consider setting KPIs to ensure dispatch down is minimised to an appropriate level while planning to create grid capacity to facilitate the pipeline of renewable projects that are being progressed. The Climate Action Plan has set a requirement to limit Dispatch Down to 7% for 2025 and 2030.
- **Energy Market Challenges:** With the UK going through their Review of Electricity Market Arrangements (REMA), there is a significant risk that this could have a large impact on ISEM, and this is an area that WEI would like to see the CRU be active in supporting the System Operators in reviewing this risk.
- **Emergence of New Technologies:** Rapid technological advancements in energy production, storage, and distribution (e.g., smart grids, IoT, AI) will require the CRU to

update regulatory frameworks to accommodate and encourage innovation while ensuring security and reliability.

- **Investment in Infrastructure:** WEI believe that the objective to deliver infrastructure at pace is essential and must be supported by all state bodies as well as industry. We are at a critical time in delivering on our 2030 targets.
- **Cybersecurity Threats:** Increasing digitalisation and reliance on smart infrastructure heighten the risk of cyber-attacks. The CRU will need robust cybersecurity regulations to protect critical infrastructure.
- **Evolving EU Regulations:** Changes in EU energy and environmental regulations will require the CRU to adapt its policies and ensure compliance. This includes the potential introduction of new directives aimed at further integrating European energy markets.
- **Supply Chain Disruptions:** Geopolitical events or global crises (e.g., pandemics) have disrupted supply chains for essential materials and technologies. The CRU will need to ensure robust contingency planning and diversified supply sources.

5. [Do you have any suggestion for strategic priorities/goals/actions and associated outcomes for the next Strategy Statement?](#)

Beyond the points outlined under question 4, WEI would like to see the following considered in setting the outcomes for the next strategy statement:

- Incentivise the deployment of innovative grid solutions, with active engagement with the System Operators.
- Develop regulatory frameworks that incentivises the adoption of energy storage solutions.
- Continue to refine and optimise the Single Electricity Market (SEM) rules and operations.
- Need for a clear regulatory role from CRU. In recent times EirGrid have undertaken a leading role on policy, this role should be with CRU, and EirGrid should be the implementors.
- CRU need to be better resourced to avoid delays we have seen on ECP, MEC share consultations continuing to happen in the future.

6. [Are there any other issues/aspects that you consider should be taken into consideration in framing the next CRU Strategy Statement?](#)



Thank you for the opportunity to provide feedback on the CRU Strategic Plan 2025–2027 Consultation. We hope you consider the comments and recommendations made within our submission and we would be happy to engage at any point to discuss.

Yours sincerely,

A handwritten signature in black ink that reads "Marcos Byrne" is written over a solid black horizontal line.

Marcos Byrne  
Policy Manager  
**Wind Energy Ireland**