



Commission for Regulation of Utilities  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

22 November 2021

Emailed to: [Electricityconnectionpolicy@cru.ie](mailto:Electricityconnectionpolicy@cru.ie)

**RE: WEI Post-Phase 1 projects' comments to the CRU Proposed Decision (CRU/21/112) on Offshore Grid Connection Assessment – Phase 1 Projects**

Wind Energy Ireland (WEI) welcomes the opportunity to engage with the CRU in relation to the consultation on Offshore Grid Connection Assessments for Phase 1 projects.

WEI is the largest representative body for the Irish wind industry, working to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future.

**WEI has separately submitted a response with detailed responses to the specific questions posed in this consultation on behalf of its members representing the six Phase 1 projects.**

In addition to this and noting the Government ambition to deliver at least 5GW of offshore wind by 2030, we would also like to present comments on behalf of the post-Phase 1 projects.

**Please note that this view is presented from the perspective of some project developers planning 'Second Phase projects'<sup>1</sup> from this point referred to as Phase 2.**

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<sup>1</sup> As described in the DECC Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System (DECC, 13<sup>th</sup> May 2021: <https://assets.gov.ie/134847/bd02ef78-75b2-4174-a160-4946c69a7b5d.pdf>)

**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 (e.g. bird & 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 EIA's.
- 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 decoupled.**

- This will provide the opportunity to engage Phase 2 projects in a meaningful way, in support of our 2030 offshore wind target, whilst also decoupling from the validity period for Phase 1 GCAs (as noted in the WEI Phase 1 project response, it is likely that Phase 1 projects will seek to extend these).
- This will also ensure that there is no commercial advantage for any projects participating in ORESS2.

We hope you consider the comments and recommendations made within the submissions that WEI have submitted, and we would be happy to meet with you at any point to discuss this feedback.

Best Regards,



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Wind Energy Ireland