

Response from SEAT group (Safe Electricity Armagh and Tyrone) to NI Utility Regulator 'Consultation on SONI's draft 2023-2032 Transmission Development Plan'

2/8/2024

SEAT who represent 6600 residents, both landowners and concerned residents whose homes are located in close proximity to the proposed second North South interconnector are setting out our response to the NI Utility Regulator's 'Consultation on SONI's draft 2023-2032 Transmission Development Plan (TDPNI).'

NEED

Since June 2007 when the overhead interconnector proposal was launched, very convincing reasons were promoted by the "experts" SONI/Eirgrid with the Northern Ireland Utility Regulator always backing up the story presented. When it was realised that strong popular opposition to the proposal was growing, a much more convincing reason had to be created and promoted, the "**lights will go out**" campaign was promoted from 2014 until 2022. The 'experts' SONI/Eirgrid spent many millions of pounds convincing the public of this fact, again with the NI Regulator substantiating every word uttered by the 'experts.' The campaign was so convincing that the NI Department for Infrastructure, Department for the Economy, the Planning Appeal Board and various Judges at a number of court cases also accepted the story. Even the Minister for Infrastructure Nicola Mallon was convinced and granted planning permission.

We all know that **the lights have NOT gone out in NI** and we are assured that NI has a very reliable Security of Supply forecast until 2031, and with the route to 2030 sustainability target very likely to be achieved. These 'experts' were focusing on the wrong jurisdiction. Look at what is happening in the Republic of Ireland.

Neither SONI, Eirgrid or the then NI Regulator went public, admitting that their very costly campaign and forecasting was all wrong. The public had been misled for fourteen years and there has been no apology for the misjudgement on a major scale, as well as the cost of the long advertising campaign and court costs, using the electricity consumers money.

AES corporation (owners of Kilroot and Ballylumford power stations) failed to secure adequate generating demand at the first I-SEM all island auction in December 2017. That resulted in Robin McCormick of SONI and Jenny Pyper Chief Executive of the NI Utility Regulator telling AES President Ian Luney that Kilroot generation was no longer competitive and will not be needed in the future, as sufficient generating capacity was secured elsewhere on the island. This we know would have been a very dangerous path to follow, when we know the vital importance of NI based generation today, providing future security of supply beyond 2031. This is another example of the failure of these 'experts' to not even be aware of the consequences of their recommendations. How many times do 'experts' need to get it wrong on such major matters before they lose all credibility? A weak and ineffective ROI Utility Regulator, together with Eirgrid, have stumbled into the data centre crisis in ROI, another example of incompetence on this island.

The people of NI would hope that you, the current NI Utility Regulator, can be depended on to make reliable, well substantiated decisions on their behalf and not fall into a position similar to what occurred in the past. At this point in time not one of the landowners or affected residents

either in Northern Ireland or ROI believe one word from SONI or Eirgrid, as they have lost all credibility. Unless you, the NI Regulator, can substantiate with credible facts all of the following points, your credibility will also suffer.

What reliable information do you have access to, which enables you to claim “It is anticipated that the carbon emissions of the island’s electricity supply will decrease over time, therefore any fossil fuel generated electricity imported via the proposed north-south interconnector will also be expected to decrease over time. It is worth noting that renewable targets in both jurisdictions for 2030 are aligned, and as such overall levels of renewable generation in the fuel mix are likely to be similar.”

Just because both jurisdictions have a similar target for 2030, not one piece of evidence indicates that ROI will reach its 2030 renewable targets. Even though there may be “agreed mutual support processes in place to ensure that each jurisdiction supports each other at times when generation is tight, or if there is a generation emergency”. If ROI has had to increase its imports by twelve times since last year and the demand for data centres is racing towards consuming 30% of all generated energy in ROI. What evidence can be relied on to accept such an expectation?

“ROI is most unlikely to stand by the SEM commitment”. It is important to note that the British Government have concerns that the expected two way flow of energy which was agreed, is not happening on the Dublin – Wales subsea interconnector. (Business Post 28/7/24)

What credible evidence is there that the proposed interconnector will “improve efficiency of the electricity system”, when one jurisdiction is in a supply crisis with no real plan to restore stability? Where is the efficiency going to come from over the next ten to fifteen years?

It appears that NI is having all its excess generated electricity hoovered up by Eirgrid at very low prices to sell to the data centres and no prospect of renewable energy being transmitted from ROI to NI for a very long time. Both NI and ROI are under the same weather patterns, so wind in ROI and wind in NI occurs at similar times and vice versa in calm periods.

NI must build its own battery and hydrogen storage in order to not depend too much on imported energy when the sun does not shine and the wind does not blow. It is very clear that for at least the next ten years we would be wrong to hope for any renewable energy being exported by ROI, even if we in NI needed it. NI would have had a much greater availability of renewable energy domestically if NIE had made the much needed £4 Billion investment to avail of all the potential of the west of the province’s renewable resources many years ago. Such an investment will do more to reach our renewable NI needs going forward than this aspiration that some day the proposed North South overhead interconnector will benefit us.

Why should anyone depend on SONI just because there is an EU directive (944/2010) in place. Their record with planning and designing a transmission system for NI, to ensure it is fit for purpose seems to be beyond their capability, when their decisions have proven so erroneous up to now.

It would be lessons not learned if you, or anyone, put their trust in SONI to make the proper long term decisions on NI Security of Supply. The proposed North South interconnector, has been claimed every year since 2007 to be vital for NI electricity security and yet seventeen years later, how can it be substantiated that the North South interconnector will benefit us in the future. It is a risk to human health and greatly devalues property, it is wrong and a costly unnecessary

environmentally damaging project, leaving a one kilometre wide barren strip of good farming land excluded from any development in the future and has no substantiated benefits for NI consumers.

ROI would be much better off laying a subsea cable from Dublin to Scotland to go some way to meeting its energy needs. ROI cannot be allowed to use our overhead transmission system as a cheap land bridge to carry energy from Scotland. Underground DC is the proven way to transmit energy between Ireland and England or Wales or France and the UK has several undersea cables connected to mainland Europe. NI also has a reliable interconnector with Scotland, with the prospect of another undersea interconnector with Kilmarnock. How many interconnectors is enough? Since the only likely energy being exported is from NI to ROI, why can ROI not lay an underground cable to NI, because they need any energy we can send them. SEAT demand that the NI regulator either hold and open review of this outdated overhead interconnector proposal or halt progress on the project as it has no useful purpose.

It would seem that, with the twelvefold increase in energy into ROI during the last year, no issues were highlighted of insufficient capacity on the existing electricity interconnector. Northern Ireland needs to first develop both battery and hydrogen storage for our future needs and the current interconnector will be capable of exporting whatever energy we wish to export.

SEM

All other EU jurisdictions have independence to manage their domestic electricity generation, as well as cross border energy trading both to import and export when appropriate, to meet their short term and long term energy security needs. No other jurisdiction in the EU has pricing dictated by a single energy generating policy like that of the rules of SEM.

Northern Ireland has been part of the Single Electricity Market since 2007. A review of the inadequate independence of the SONI board by its ROI parent company, Eirgrid, was carried out in 2020 and 2021 by the NI Regulator. A number of protections were put in place to ensure it is meeting the needs of NI's domestic and business customers. The current practice by Eirgrid importing any surplus energy generated in NI, as well as using the existing NI overhead transmission as a cheap land bridge to import increasing volumes of electricity from Scotland, to help reduce the major deficit in ROI which will only increase in the next ten years on the island of Ireland. This will greatly hinder investment in storage by private investors in NI if otherwise constrained renewable energy is not available at very competitive prices for a developing and sufficient storage industry in NI.

This SEM system has been misused in the past and is still being misused even now. NI consumers by having to accept a common all island generated price, are at a marked disadvantage because of the continuing high demand for electricity in ROI and the many billions of investment needed over the next ten-fifteen years to try to return to a reliable security of supply position. These future costs can only be repaid by consumers, north and south. It is unacceptable for people in NI to be lumbered with the increasing costs needed to supply the rapidly increasing demand for energy in ROI. People in NI are not in any way going to benefit from the investment in power hungry data centres in Dublin. It is also very short sighted to allow ESB to use curtailed/constrained renewable generation, often imported from NI, to allow for development and growth of battery and hydrogen storage capacity for ROI. SONI are exporting surplus energy and not directing it towards much needed battery and hydrogen storage in NI, in preparation for 2030 directives for 80% renewable energy. At the moment the NI Utility Regulator

has no authority to address this matter . SONI, being a subsidiary of Eirgrid, will always listen to their owners and look after Eirgrid's and ROI needs first.

The SEM system needs to be suspended until ROI is in a position to comply with all the terms and conditions set out in the 2007 charter for SEM.

Signed 

John Woods **Seat Group** 2/8/24