Source Galileo | Octagon Point | St Paul's | London EC2V 6AA

Source Galileo Response

SONI Draft Transmission Development Plan for Northern Ireland (TDPNI) 2023- 2032

Source Galileo welcomes the opportunity to respond to this Utility Regulator (UR) public consultation on the draft Transmission Development Plan Northern Ireland (TDPNI) 2023- 2032 as prepared by SONI. This Plan outlines proposals for the development of the NI transmission network and interconnection over the ten years from 2023.

Currently, Source Galileo is developing a number of offshore projects in Irish waters. Such projects are needed to generate significant volumes of clean renewable electricity and to improve the State's energy security, tackle the challenge of climate change in a tangible manner and to enable Ireland to transition to a net zero economy no later than 2050.

Both Ireland and Northern Ireland have instituted binding climate legislation in the form of the Climate Change (Northern Ireland) Act 2022 and the Climate Action and Low Carbon Development (Amendment) Act 2021 with mandatory targets to reach net zero by 2050 now enshrined in law in both jurisdictions.

Source Galileo's proposed Malin Head fixed foundation offshore wind project[i] located in 60m water depths on the Malin Shelf in the Atlantic Ocean, off the coast of Donegal, can make a significant contribution to regional energy independence whilst also providing an opportunity for long term regional green investment in line with the all-island energy policy framework subject to enabling public policy developments.

Source Galileo Comments

Whilst Source Galileo recognises the inherent difficulties in formulating a plan of this nature given ongoing resourcing constraints and protracted timelines for planning decisions, it is not clear that that significant transmission developments and the connection of new renewable generation required to give effect Northern Ireland's binding climate targets are provided for in this iteration.

Such targets and indeed the 80% renewable electricity by 2030 (80 by 30) require rapid and accelerated connection of new renewables in an unprecedented manner. As Northern Ireland is already lagging behind other jurisdictions from a policy perspective, the delivery of the requisite transmission infrastructure is needed to support the development of renewable energy projects and associated supply chains.

This risk is underscored by previous iterations of the Plan whereby only a limited amount of grid capacity has in fact been delivered thus undermining investor confidence in the region and frustrating the delivery of balanced regional development as underlined in stated policy positions.

Of particular concern is the fact that transmission development in Northern Ireland continues to lag significantly behind the build out of renewable generation and is particularly acute in the Northwest region. Coupled with the fact that the grid is less developed in general terms in this region and is beset by persistent constraints, it is imperative that the grid is developed in a significant manner and upgraded where appropriate to accommodate increasing levels of demand and supply.

This is a prerequisite for a more distributed and renewables-focused energy generation system. It is also necessary to harness the considerable offshore potential in the region and to underpin investor certainty whilst facilitating regional development and supporting the delivery of a secure supply of electricity.

In this regard, the demand scenarios provided for in the draft Plan do not appear to be reflective of existing and future demand. In particular, future economic development opportunities via the development of data centres and next generation technologies will be lost to the region unless such demand is provided for in a clear manner. This need will become even more prominent in light of the growth of AI and unprecedented global demand for data centres.[ii]

Also, the Tomorrow's Energy Scenarios (TES) 'Accelerated Model' is being utilised to inform future needs from a grid development perspective. However, as EirGrid is currently in the process of developing a System Needs Assessment to accompany TES, the draft Plan should take account of this needs assessment and that was published prior to the publication of TES. It would also be helpful to understand what information was utilised to underscore the underlying Cost Benefit Analysis Mechanism.

More generally, the level of investment planned is not sufficiently ambitious given that only six new projects are provided for, and a number of existing projects have been delayed for a number of years. As such, the draft Plan in its current form poses a real risk to the achievement of Northern Ireland's climate ambitions for 2030 and beyond. In this regard, anticipatory investment will be a key output of GB's Centralised Strategic Network Plan (CSNP) led by the Future System Operator.

The importance of such investment has been highlighted by both the UK Government and the European Commission whereby regulatory frameworks will be amended to support the energy transition, focusing on an approach of enabling strategic investment ahead of need. Such an approach should also be considered in the Northern Ireland context to futureproof required investment and to underpin much needed economic and balanced development for the region.

Policy Alignment – An All-island Perspective

From a policy alignment perspective, both the National Planning Framework (NPF) and the Regional Development Strategy for Northern Ireland provide a basis for long-term co-ordination on infrastructure development, including transport, energy, and communications.

In terms of population, just over 7 million people live on the island of Ireland, 5.15 million people in Ireland (73% of total) and 1.9 million people in Northern Ireland (27% of total) (Census 2022, CSO and Northern Ireland Statistics & Research Agency). By 2040, the island will become home to approximately 8 million people.

The first statutory revision to the NPF underlines the following key policy objectives that support the development of Ireland's offshore renewable energy and underpins the need for all-island collaboration to strengthen security of supply via all-island energy infrastructure and interconnection capacity and strategic cooperation in relation to offshore wind development.

- **National Policy Objective 56**
  To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.

- **National Policy Objective 62**
  In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply, and explore the potential for strategic cooperation on offshore wind energy development.

- **National Policy Objective 72**
  Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development.

- **National Policy Objective 73**
  Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

In addition, the UK & Ireland MOU[iii] 'Cooperation in the Energy Transition, Offshore Renewables & Electricity Interconnection,' is aimed at increasing cooperation for developing offshore renewable energy and facilitating increased cooperation on opportunities for further electrical interconnection between the island of Ireland and Great Britain. Moreover, opportunities to be explored will include the feasibility of a joint multipurpose interconnector project.

A joint working group has now been convened to ensure the smooth execution of the agreements and to facilitate information-sharing between Ireland and the UK on the transition to renewable energy and deployment of onshore and offshore renewable energy, including renewable and low carbon hydrogen.

In light of the foregoing policy objectives, it is imperative that transmission planning is carried out on a coordinated all-island basis and to ensure as far as practicable that projects to be developed will benefit the entire island.

The delivery of such projects is also key to the strengthening of all-island energy security and resilience to support a growing population of 8 million people as expressly recognised in Ireland's National Planning Framework (NPF) and Regional Development Strategy for Northern Ireland whilst providing opportunities for long term regional green investment and balanced regional development.

[i] Further detail on the proposed offshore wind developments in Ireland (located at Malin Head off the North Coast, the Southern coast, and the Eastern coast) is available at: Projects | Source Galileo

[ii] Kimberly Steele, 'Growth of AI creates unprecedented demand for global data centres', 31 January 2024. Available at: Growth of AI creates unprecedented demand for global data centers (jll.ie)

[iii] 'Cooperation in the Energy Transition, Offshore Renewables and Electricity Interconnection'