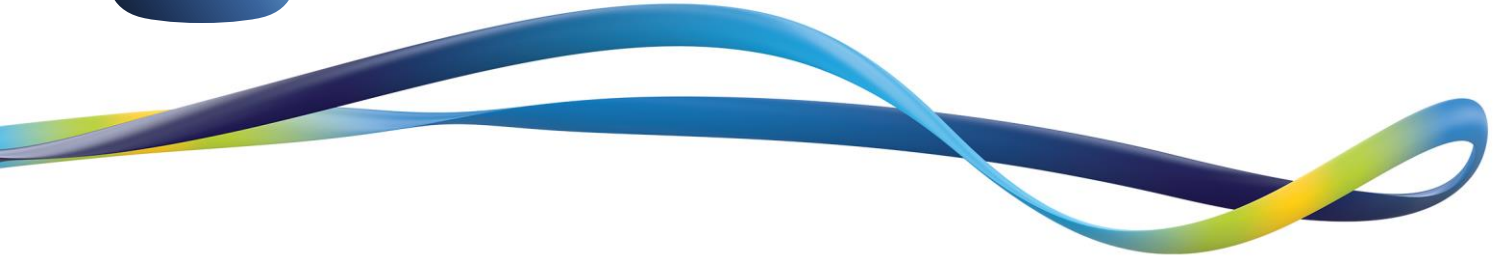




NETWORKS



OFFSHORE CONNECTION ASSETS - PHASE 1 PROJECTS

ESB Networks' Response to CRU Consultation
CRU/2022/972

2nd December 2022

ESB Networks fully supports the development of the offshore transmission system and new customer connections. We will continue to work closely with all stakeholders to facilitate the development of offshore wind generation and by doing so help meet Ireland's 2030 emissions targets.

As the onshore TAO our primary consideration relates to the impact of the offshore projects on the onshore transmission system. This relates to both the onshore infrastructure reinforcements and development, and to the onshore asset transfer and interface arrangements that apply at the Point of Common Coupling (PCC).

ESB Networks as TAO (onshore), believe it is important to ensure that the processes for the transfer of contestable onshore assets to the offshore TAO (EirGrid), and for the transfer of contestable onshore assets to the onshore TAO (ESB Networks) (the contestable scope of which will be defined within the TSO Customer's Connection Agreements for Phase 1 and future Phases of Offshore Projects) are consistent and aligned. Otherwise, there would be significant scope for confusion with different transfer processes on the same connection, involving two transmission owners, a developer and potentially the same/or multiple landowners.

There are well established processes which describe the onshore transfer process, these have set out a methodology and principles which address the asset transfer issues from ownership, scope, roles and responsibilities.

Separately, if an incentive is included as part of the transfer process associated with the offshore TAO assets, then the implications for the onshore TAO and the developer's associated contestable works for their offshore project should be considered. These contestable works (see Figure 1 which is an extract from CRU consultation paper CRU/2022/51) may include a single-bay substation, a contestable HV cable and a newly built contestable meshed onshore substation.

In designing an asset transfer process, it is essential that there is clarity around the PCC for each of the offshore developments. Figure 1 outlines the ownership boundary between EirGrid as offshore TAO and ESB Networks as onshore TAO, at a high level. However, as there are a number of different arrangements possible for the boundary between ESB Networks and EirGrid, we request that these are explicitly covered in detail with appropriate single line diagrams.

For clarity, our understanding is as follows (as per the schematic in Figure 1) and ESB Networks would like to receive clarification on this:

- If the EirGrid onshore compensation compound is to be distant (i.e. not adjacent to) existing or new meshed onshore substation, then a TAO (ESB Networks) owned single bay substation is required at the onshore compensation compound and the TAO (ESB Networks) would own and

have protection on the HV cable connecting the single bay station to new/existing meshed substation.

- If the EirGrid onshore compensation compound is to be immediately adjacent to existing or new meshed onshore substation, then there would be no need for a TAO (ESB Networks) single bay substation and an under/over fence connection would be made where the PCC would be at the first point of connection in EirGrid’s compensation compound (with TAO (ESB Networks) owning the connecting HV conductor/cable).

This is consistent in our opinion, with current application of onshore connections. An appropriate policy could be developed once the detail is agreed and finalised in relation to the ownership boundary for offshore projects between EirGrid as offshore TAO and ESB Networks as onshore TAO.

ESB Networks are available for further consultation and engagement on this topic should that be required.

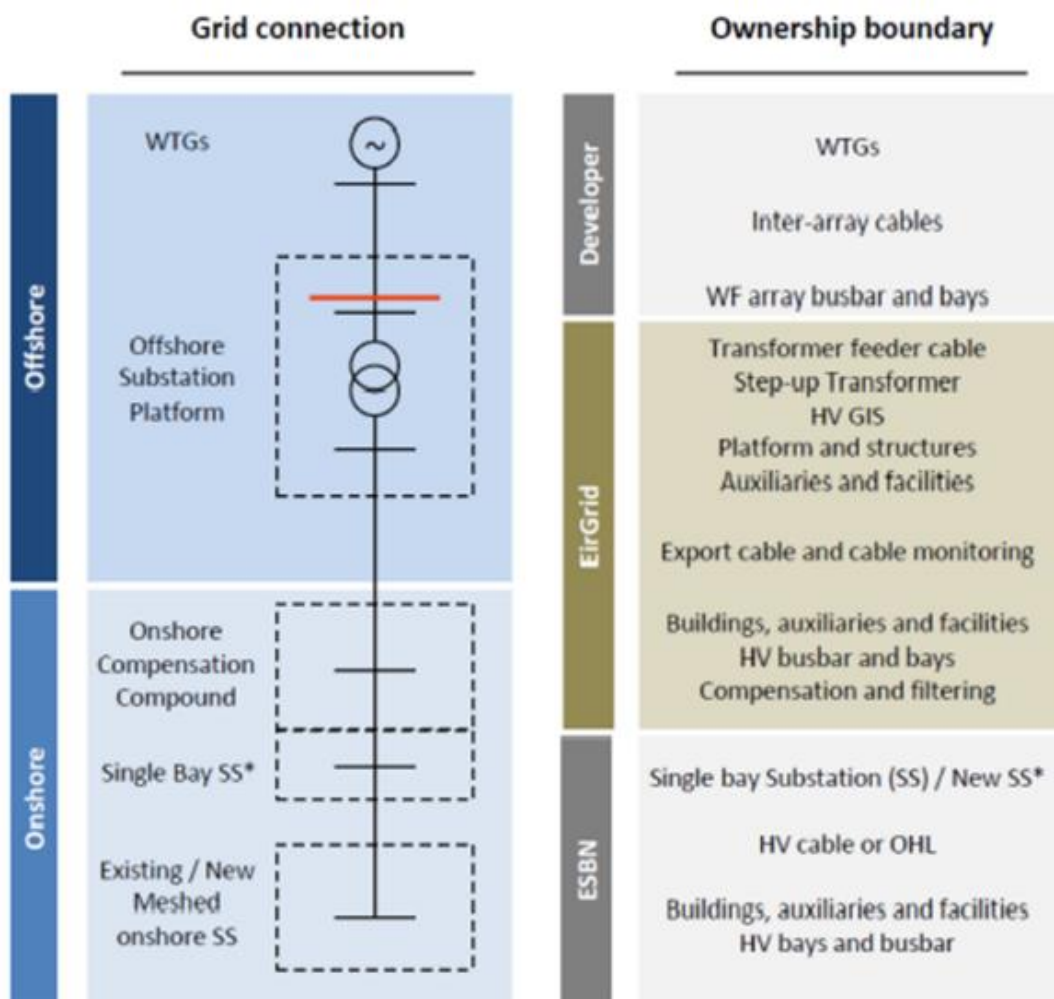


Figure 1: Boundary model extract from consultation CRU/2022/51 (Offshore Connection Policy – Phase 1 projects)