



23<sup>rd</sup> May 2012

Mr. Martin Crouch  
OFGEM  
9 Millbank  
London SW1P 3GE

By email to: [ITPRMailbox@ofgem.gov.uk](mailto:ITPRMailbox@ofgem.gov.uk)

**Re: Planning for an integrated electricity transmission system – request for views.**

Dear Mr. Crouch,

The National Offshore Wind Energy Association of Ireland (NOW Ireland) was established to promote the development of Ireland's substantial offshore wind resource and to ensure that Ireland's offshore wind energy resource is developed in co-operation with EU partners, particularly our nearest neighbour, UK. NOW Ireland was established by companies that have over 2,600 MW of offshore wind farm projects under development in Irish Waters and have since been joined by a number of national and international companies operating in the offshore wind supply chain sector including turbine, foundation and substation equipment manufacturers.

The Irish Government has recently published a draft Offshore Renewable Energy Development Plan which allows for the development of up to 4,000 MW of offshore wind in Irish Waters by 2030. The Strategic Environmental Impact Assessment that accompanies this report indicates that there is a further potential to develop up to 12,500 MW of fixed offshore wind and 27,000 MW of floating offshore wind without significant environmental impact. These resources provide an opportunity to develop an integrated market for the provision of carbon free electricity between Ireland and the UK and mainland Europe. Based on these reports, NOW Ireland considers that 5,000 MW of Irish offshore wind energy capacity is a reasonable target for export to the UK by 2020.

As you may be aware an Inter Governmental Agreement is currently being negotiated between the Irish and British Governments. This Agreement will provide for the bilateral mechanisms under which renewable energy trade can be conducted between the two jurisdictions, whether by statistical transfer or physical exports. We acknowledge the timeliness of this review of the planning for the development of an integrated electricity system and welcome the opportunity to submit our views for consideration. Please see our comments on the questions outlined in your open letter below:

1. NOW Ireland considers that the objectives and scope of work for the ITPR project are appropriate.
2. NOW Ireland suggests that the France-UK-Ireland market electricity integration project, which has a deadline of 2014, be identified as a driver of the project. The interconnection necessary should be identified under the EU Commission Infrastructure Package as soon as possible.
3. NOW Ireland would draw attention to the scale of offshore wind energy that is available in Ireland and which has not been identified as being necessary for meeting Irish 2020 RE targets. At least 5,000 MW is available from projects which are well advanced in the consenting process - see attached map, which doesn't include projects on the West coast of Ireland, one of which is being developed. In addition, we would draw attention to a study published by the Irish TSO, Eirgrid, in which several scenarios for UK-IE interconnection of several Gigawatts are discussed. ([www.eirgrid.com/media/EirGrid%20Offshore%20Grid%20Study.pdf](http://www.eirgrid.com/media/EirGrid%20Offshore%20Grid%20Study.pdf)). The full report is at [http://www.eirgrid.com/media/2257\\_Offshore\\_Grid\\_Study\\_FA.pdf](http://www.eirgrid.com/media/2257_Offshore_Grid_Study_FA.pdf). In these scenarios, an export capacity from Ireland to UK of 5,000 MW was considered as reasonable.
4. NOW Ireland's view is that all stakeholders should be involved and not just TSO's. However, for efficiency, one entity should drive the agenda and NETSO is well placed to fulfil this role.
5. NOW Ireland's view is that system planning can be best incentivised through consensus between all stakeholders, including DG Energy under the Infrastructure Package.

We would welcome the opportunity to discuss these views with you further. If you have any queries please contact us.

Yours sincerely,  
**NOW Ireland**

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Garrett Connell, Committee Member