

Stuart Borland
Electricity Transmission
Ofgem
9 Millbank, London
SW1P 3GE
0207 901 7134
Cap.Floor@ofgem.gov.uk

I [REDACTED] make this submission in my capacity as a stakeholder in any project that has the capacity to directly affect my rights , my environment, my health , or my asset value. I am an ordinary member of the public, with no vested interest in the Greenlink project, other than in my capacity as a consumer in Ireland, my submission is, that I, and citizens of Ireland should not have to bear the cost of providing a benefit to either the UK consumer or the company Element Power. I'll keep it brief.

- Whether the changes proposed to our analysis are appropriate, and whether the estimated impacts seem reasonable.

I have read the document on the update of your initial assessment of the Greenlink Interconnector, and quite simply, see no reason why you should change your initial assessment of the project. The whole reasoning for change of mind are based totally on arguments put forward by the promoter, most of which are based on their opinion, and cherry picking of regulatory changes that might happen in Ireland, their interpretation of the capacity, current and future, of a 'rival' interconnector, their interpretation of probable integration of wind projects onto both the Irish & UK grids in near future, and their interpretation of the political will to allow the build out to occur, in both Ireland and UK, plus their commissioning of a report to back up their claims. The quickest answer to a lot of these claims is, they would say that wouldn't they.

1. Regulatory uncertainty in the Republic of Ireland was cited as a reason for initial refusal of this project, this being Ireland, this uncertainty still exists. The much quoted unconstrained DAM is still under consultation, and of course its adoption is dependent on a number of events, most of which are also uncertain, one of which is the greenlink project itself, below is a response , provided to me by CER Ireland on the issues raised in the Element power submission to ofgem

“CER is currently in the process of considering how it should assess the appropriate regulatory regime in Ireland if the Greenlink Interconnector were to be built. Therefore, there are many aspects on which CER has not yet reached a decision. However, CER recognises that it likely will have to provide some responses to Element Power in order for Element Power to take its own commercial decisions in relation to the Greenlink project.

I am not sure what information that you believe CER has provided to Element Power. To my knowledge, CER has not provided any information to Element Power in support of, or to support, Element Power's commercial Greenlink proposal.

CER bases its view on the future prospects for the Moyle Interconnector on the published statements by Mutual Energy and NIAUR, as I assume does Greenlink. CER would not provide commercially sensitive material to a commercial entity such as the Greenlink promoters.

As to a CBA, I would repeat my advice that CER is currently considering how, and on what bases, CER should assess the appropriate regulatory regime for the Greenlink Interconnector if it were to be constructed."

Ireland, much like to UK , has experienced a rapidly increased opposition to the erection of on-shore wind farms on its lands. Indeed this topic has become a bit of a political hot potato in the last year or so. Changes to guidelines for Wind farms have been due since Dec 2013, allegedly they are complete, but their release have been delayed incessantly, seemingly with the intent of allowing as many applications into the planning system as possible under the current , recognised as totally inadequate ,guidelines. Element Power themselves are in the process of submitting applications for a number of enormous wind farms under the current regulatory regime, however they have been stalled and challenged at every turn, and are currently the subject of a challenge to the supreme court, following a judicial review of the process of awarding strategic infrastructure development status to projects such as these. The same application for planning has been the subject of a 3 week oral hearing, and no decision can be made on this process until the Supreme Court ruling. Regardless of outcome of SID status case, their plans to build out 'generators' to feed the proposed interconnector will undoubtedly be challenged by communities at every step of the process. Of wind farms applications before the Irish planning boards, ABP, over 87% are subject to judicial challenge. Be sure that the political will to push on-shore wind farms is rapidly receding, as is the case in the UK, so treat with a pinch of salt all claims made by EP on the political will to implement their preferred policy, and the possibility that their idea of wind build will materialise , either in Ireland or in the UK. Their claim that 'generators' (read themselves) would gladly sell at below cost to an interconnector (their own), in order to avail of local subsidies , is an insult to the intelligence of all concerned, not least the Irish consumer who would in effect be subsidising both element power and the UK consumer. Their claims that the 'carbon credits' for so called renewable target could count towards UK targets is plainly false, below is a response to a query from me directed through European commission and answered by our department of energy and natural resources, DCENR

"The Renewable Energy Directive 2009/28/EC, sets an overall target for Ireland of 16% of energy to come from renewable energy sources. From an electricity perspective, it is where the energy is produced that determines the MS that the generation is attributed to for accounting against the target."

The EP commissioned report from MullenGrid Consulting will obviously produce a favourable outcome, 'He who pays the piper calls the tune', and however it is worth noting that all inputs to said report are un-verified by the consultants employed.

What the implications for our overall assessment should be, including any conditions that should apply.

Ofgem, who are tasked with ensuring that the UK consumer will benefit from the Greenlink interconnector have already ruled on this project, using an independent firm to conduct a CBA on all proposals . You state in your document that

We are not proposing (or consulting on) any broader changes to our methodology for assessing interconnector projects or to our analysis.

I would suggest that Ofgem sticks to its principles, and not allow the tail to wag the dog.

I Trust that due consideration shall be given to this submission, stakeholders/consumers views are every bit as valid as project promoters. Whilst lacking the financial clout to commission reports, one can read reports with an objective eye and cut through the BS.