

A dhuine uasail,

Chambers Ireland broadly welcomes the Commission for The Regulation of Utilities proposals regarding the Offshore Grid Connection Pathway for Phase 2. It is however unfortunate that this consultation has not been co-ordinated with the ongoing Department of the Environment, Climate and Communications consultations regarding the Offshore Renewable Energy Support Scheme 2, the Commission's upcoming consultations on Grid Assets, Connection policies and the Impact of these on the TSO's revenue. Our energy system is the most complex machine in our country. Proposing alterations to the policy that supports its development in an ad hoc and piecemeal manner will ultimately make the process of shifting our electricity supply to a sustainable and decarbonised model more complex.

Chambers Ireland remain concerned that the projects that have been successful at the Offshore Renewable Energy Support Scheme 1 phase may not lead to the development of the targeted 5GW of offshore wind generation by 2030. There are likely to be planning appeal cases which will lead to delays and attrition and therefore the extension of the Phase 1 Grid Connection Assessments for non-Offshore Renewable Energy Support Scheme projects set out in the Commission's Proposed Decision which support and alternative route to grid is to be welcomed.

Chambers Ireland is concerned that as things stand, not only will Ireland not be able to achieve our 2030 generation targets, but also that should there be complexity and delays arising from the planning system then this will delay the implementation of the Phase 2 projects. Our view is that regulatory risk is the greatest impediment to the development of offshore wind in Ireland and that this common-sense and reasonable approach that the Commission is proposing to take will help resolve some of the concerns of international investors and help undo some of the reputational damage that our uncertain regulatory regime has created.

We welcome a multi-pronged approach which does not prejudice projects based on their route to market is the best means of ensuring that we can achieve the Government's policy goals.

Given the regulatory risk it may be the case that the intrusion of the planning system may result in projects that part of the Offshore Renewable Energy Support Scheme 1 may not be able to meet project milestones and having alternative routes to Grid (whether they as described within the proposed decision or through entry into the later Phase 2 projects) will be of benefit. It is Chambers Ireland's view that our energy

policy should be built around maximising the volume of renewable energy which we are able to integrate with the electricity grid, and that we should upgrade and reinforce our electricity grid to support the additional capacity.

It is also our view that given that the technological domain is complex and changing that the Commission (and the Department) ought to ensure that all decisions that are made are technology neutral regarding the source and the use of electricity that is generated. It is also vital that the Commission does not inadvertently close off the addition of developing technologies such as Hydrogen, becomes more flexible regarding the creation of hybrid thermal, renewable and storage projects.

From the consumers' perspective Chambers Ireland supports the principle of the Phase 1 Merchant Project approach as it should help us meet our economy come closer to reaching our emission reduction targets and our ever-growing Climate Action Plan ambitions.

That there is a large demand from industry for Corporate Power Purchase Agreements and that this proposed decision ought to result in increased supply of renewable energy that will help the commercial sector decarbonise its electricity supply more quickly, and so help the industrial sector stay within the government mandated carbon budget.

From the perspective of our members that are generating renewable electricity it is important that there is a level playing field between projects that were successful within the Offshore Renewable Energy Support Scheme 1 (and potentially successful in Phase 2) and those projects which find alternative routes to market (regardless of whether that is through Corporate Power Purchase Agreements, Hydrogen production, international interconnections etc.) Therefore such projects should retain many of the requirements that are made of Offshore Renewable Energy Support Schemes such as Community Payments, Bid Bond, and Security Rates etc. should also pertain to alternative route to market projects to ensure that standards are maintained and to avoid developers arbitraging the permitting system.

Good regulation is reasonable, rational and coherent. Chambers Ireland remains concerned that the coherence of our regulatory regime is still questionable (and is questioned by interested parties that are outside of our jurisdiction) and our view is that the Commission and the Department should continue to close off areas of remaining uncertainty relating to Grid Feasibility and Connection Offers with the greatest alacrity. Furthermore, timely and reasonable decision making is critical in

order to maintain investor confidence in the projects that were not successful in Offshore Renewable Energy Support Scheme 1 and also to demonstrate to investors that there has been a significant change to the offshore energy regulatory environment.

Finally, there remains significant support and interest from across the regions in facilitating the offshore energy industry, that there are a considerable number of jobs that will come from the construction and operations phases to some of the least advantages economic areas, that there are further opportunities for us if we succeed in capturing parts of the offshore renewable supply chain. There has been a very strong positive shift in the mood towards facilitating offshore renewable energy projects across the country and it would be unfortunate if further regulatory inconsistencies resulted in delays that could see that interest dissipate.

Kind regards,

Shane Conneely  
**Director of Policy and Communications ,**  
Chambers Ireland

