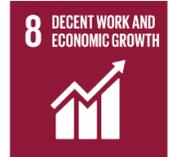




**Chambers
Ireland**
Advancing business together



Renewable Electricity Support Scheme 6

Submission by Chambers Ireland

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are affiliated Chambers in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities. We are the only business organisation with a truly geographic footprint and as a result are uniquely positioned to assist in the development of critical infrastructure to meet our economy's future needs.

Key Points

- RESS 6 must incorporate lessons from previous auctions to support timely delivery of renewable projects.
- A more competitive and investable auction framework is required for RESS 6, given that RESS 5 delivered lower participation.
- Persistent planning delays and system-wide grid constraints continue to slow renewable delivery, reflecting the scale and complexity of infrastructure expansion required.
- Expedited consenting and expanded connection capacity should be prioritised, alongside continued investment by system operators to deliver network reinforcement at scale.
- Rising supply-chain costs and inflation are eroding project viability and underscore the importance of auction designs that reflect real market conditions.
- Maintaining a technology-neutral approach is important to safeguard competition and avoid unnecessary cost increases.
- Electrification is central to achieving climate targets and requires adequate grid infrastructure capable of accommodating increased renewable capacity.
- Planning and regulatory inefficiencies remain a major barrier to infrastructure delivery, requiring more consistent and predictable decision-making.
- Energy supply constraints continue to pose significant operational and competitiveness risks for businesses.
- Divergent interpretation of planning guidelines across authorities contributes to uncertainty and delays in development.
- Targeted judicial review reforms are necessary to optimise the system while also ensuring access to justice is maintained.
- A structured scale of fees in environmental judicial review proceedings will improve cost certainty, reduce disputes, and promote consistent outcomes for litigants.

Our Perspective

General

Ireland remains one of the most fossil-fuel-dependent countries in Europe, with roughly 80% of our energy needs met by a range of non-renewable sources. Within that, our electricity system has the highest reliance on fossil fuels in north-west Europe. As the State spends a disproportionate amount on fossil fuels; a figure that rises sharply whenever international prices increase.

When it comes to solutions, there are no quick fixes. The key therefore is to adopt a technology-neutral approach that harnesses all renewable resources available to the State.

Within this context, wind remains one of the State's greatest domestic resources and brings with it not just the potential to mitigate issues with the domestic market but export opportunities as well. However, the core challenge for the energy sector is to ensure that this resource can be delivered affordably for the domestic market before export opportunities can be realised.

To make progress, auction systems have to be reformed so that the cost of generating electricity from renewable sources continues to fall. Communities also need to be involved and cooperation will be essential to build the grid infrastructure required to move and manage this power effectively. Managing and meeting these challenges will go a considerable way to determining the success of the State's green transition.

Outcomes from RESS 5

There were several challenges with RESS 5 which resulted in lower-than-anticipated participation and capacity procurement. RESS 5 procured 1,500 GWh of new renewable energy, which is a 25% decrease from the RESS 4 auction and only 23 projects were selected out of 33 that submitted offers. Solar projects were particularly successful and accounted for 860MW, however only a low number of onshore wind projects (219MW) were successful. This

comparative lack of successful wind projects illustrates how wind in particular continues to struggle with competition in this framework.

The most significant drivers of these issues are the prolonged planning delays and grid connection constraints. Combined, these factors reduce investment certainty for developers operating within an already capacity-constrained system.

As a result, investments were not made that would benefit the State significantly.

High costs arising from increasing supply chain costs and inflation have also negatively impacted project costs substantially. Furthermore, some developers are choosing to avoid the RESS process entirely and opt for Corporate Power Purchase Agreements (CPPAs) as an alternative route to market.

Climate Targets

The importance of being technology neutral.

Maintaining a technology-neutral approach is essential to delivering our climate targets. In the context of RESS 6, while the proposed shift toward technology-specific auction pots for wind and solar reflects new EU Net-Zero Industry Act criteria, it runs the risk of reducing competition and increasing costs by narrowing the range of eligible solutions. This is not conducive to a system that rewards all efforts made to transition to low/no-carbon solutions.

Fundamentally, support schemes should prioritise outcomes rather than prescribe which technologies must deliver them. This shift in policy should manifest in rapid deployment, system integration and value for consumers.

In the Programme for Government last year, Government expressed a commitment to frequent RESS auctions as intended to capture falling technology costs and avoid locking in higher prices; a principle that depends on open competition across all viable renewable technologies. This is welcome; a technology-neutral design helps ensure market conditions that reward innovation and determine the most efficient pathway to achieving our climate targets.

Electrification

Ultimately, progress in electrification will be the most significant driver of progress on our climate goals. This is because only a rapidly expanded, modernised electricity system can accommodate the large volumes of new wind and solar generation and enable households, transport, and industry to switch from fossil fuels to clean power.

Accordingly, RESS 6 represents a crucial step in further electrifying the State's energy system, as it underpins the expansion of onshore wind and solar needed to meet our climate goals. Electrification is increasingly becoming the central pillar of our energy policy and this mirrors wider European trends that foresee electricity demand doubling by 2050¹ and up to 80% of final energy use becoming electrified. Nonetheless the success of this transition depends not only on renewable deployment and grid expansion but also on securing the specialised materials embedded in every layer of the electricity system.

As an example, epoxy resins are critical to transformers, circuit boards, high-voltage components, and battery systems, providing the insulation and durability that enable a reliable and safe grid. As the State faces constraints in grid capacity - one of the primary bottlenecks for connecting renewable energy and electrifying heat and transport - the dependency on these materials becomes increasingly strained.

Electrification similarly relies on advanced epoxy-based composites that support lightweight vehicle components, protect power electronics, and enhance system lifetimes. However, at EU level, materials policy has not kept pace with its electrification ambitions and this has risked supply bottlenecks, regulatory uncertainty and slower innovation in the chemical inputs that make electrification viable. At the national level - where the State is highly dependent on imported technologies and on EU-level regulatory coherence - such mismatches will magnify the existing delays in grid reinforcement.

¹ <https://www.eea.europa.eu/en/europe-environment-2025/thematic-briefings/climate-change/trends-in-the-energy-system>

Aligning Ireland’s climate strategy with a more robust European materials policy framework that supports resilient chemicals manufacturing, incentivises circular design and recycling, and ensuring stable access to essential industrial inputs is therefore emerging as a foundational requirement. Without this alignment, material shortages in components will undoubtedly slow the pace of electrification and undermine our ability to meet sectoral emissions ceilings and our climate targets.

While electrification will be central to decarbonisation, gas networks are also expected to play an ongoing and evolving role in the energy system, including in system balancing, security of supply and the development and integration of low-carbon and renewable gases.

Energy Security

Over the past number of years, our energy security has increasingly been highlighted as an area of concern² requiring acute focus and investment, given our reliance on imports. Ensuring that the State has an uninterrupted availability of energy sources at an affordable price has rarely been more important given the increased number of variable threats that have negatively impacted the State’s energy system. Decreasing the State’s reliance on fossil fuel imports and expediting the delivery of renewable and sustainable sources of energy therefore has to be the overriding objective of the State’s policy.

Threats to the system can be natural, technological, or human-driven and require ongoing resilience planning and investment to protect critical energy infrastructure.

Examples include and are not limited to:

² As discussed at political level in the Dáil: <https://www.oireachtas.ie/en/debates/debate/dail/2022-10-27/34/>; the Sustainable Energy Authority of Ireland (SEAI) acknowledged the relationship with imports and indigenous sources here: <https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2022.pdf>, pg: 31; and <https://www.seai.ie/sites/default/files/publications/First-Look-Energy-Supply-and-Security-of-Supply.pdf> pg: 29 “Ireland’s overall energy imports dependency in 2024 was 79.7%, up 1.4 percentage points on the value of 78.3% for 2023. By way of comparison, the average EU energy imports dependency in 2023 was 58.3%”.

- Natural disasters
- Cyberattacks
- Geopolitics
- Fluctuations in price
- Climactic changes³

The impacts⁴ to businesses are numerous, including:

- Reduced outputs
- Overall reduced investment due to uncertainty
- Scaled-back production
- Relocation
- Compressed profit margins

The ultimate cost manifests as lost investment, reduced competitiveness and a risk of deindustrialisation. Contrastingly, a system that is secure incorporates resilient systems and approaches that can prevent, mitigate, or allow for adaptation to such threats. Acknowledging the role of the private sector, encouraging investment and facilitating its role will therefore be central to its success.

Within this context, RESS 6 has an integral role to play in mitigating threats by facilitating as many renewable energy projects as possible which will ultimately ensure competition and cost reduction for the final consumer. Doing so will involve learning from the issues which arose from

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For example, extreme weather events can place additional strain on energy distribution infrastructure and substations, including significantly increased demand for cooling, underscoring the importance of continued system hardening and resilience measures

, and rising temperatures can significantly increase demand for cooling: <https://iopscience.iop.org/article/10.1088/2516-1083/ad3f6a/pdf>.

⁴ The impact on businesses across all sectors of the Russian war in Ukraine is the most recent stark example:

<https://eidoism.org/blog/2025/09/05/europes-industrial-decline-and-energy-disruption-2025-2045/>

the design of previous RESS auctions as alluded to previously and ensuring those same mistakes are not repeated in the design of RESS 6.

The optimal way to do so is to deliver an auction that enables investment in our renewable energy infrastructure and takes advantage of the significant opportunities that exist in terms of offshore wind. Consistent with our point elsewhere regarding the low number of wind projects that were successful in RESS 5, this should be an acute area of focus of RESS 6.

A secure energy system will hence require a balanced approach that combines renewables, hydrogen storage, and substantial grid development and reinforcement. However, progress on these fronts is primarily being held back by institutional and regulatory barriers, and inefficiencies in the planning system pose the most significant obstacle. In this context, the limited remit of MARA was a missed opportunity to date. Rather than becoming the strategic, proactive “IDA of the sea”,⁵ it has been confined to a purely regulatory role. This represented a missed opportunity for leadership and ambition in implementing a system that encourages investment which is crucial to offshore and onshore development. It is also important to recognise the unprecedented scale of investment and reform currently being undertaken by system operators to strengthen resilience, expand capacity and integrate renewable generation at pace.

Security of supply for businesses

While the earlier RESS auctions were widely understood to comprise a five-round programme, RESS 6 builds on those previous competitions and provides a further opportunity to strengthen the stability and security of energy supply for businesses and communities. It is critical that the associated connectivity infrastructure - such as grid and network reinforcement - keeps pace with this expanded ambition so that new renewable generation can be delivered and integrated efficiently.

⁵ <https://chambers.ie/wp-content/uploads/2022/09/Submission-to-CRU-on-Electricity-Network-Tariffs-%E2%80%93-NESF-Response-Proposals.pdf> pg 12.

Delays in customer connections arising from system-wide capacity constraints have broader economic implications, especially as the State competes globally for infrastructure investment and supply chain capacity.

In Ireland specifically, legacy grid limitations and rapidly growing demand have contributed to delays in major infrastructure projects due to power availability constraints.

Without reliable supply, businesses face operational risks which also impact their long-term planning. Combined, these risks depress productivity and undermine the competitiveness of affected businesses. At a granular level these can manifest as:

- Interruptions to production lines
- Downtime in digital services
- Loss of data availability
- Costly reliance on backup power systems

Furthermore, a lack of confidence in the system means that the State loses its attractiveness for foreign direct investment (FDI). Confidence in the energy system is a core criterion for investment in high-value energy-intensive sectors⁶ such as pharmaceutical manufacturing, semiconductor production, hyperscale data services and AI infrastructure. Any further inefficiencies in supply and grid connectivity will have a considerable impact on our reputation as a global digital hub.

⁶ Volatility in energy prices directly impedes industrial capital expenditure (CAPEX) and overall investment while also constraining the competitiveness of energy-intensive industries, as acknowledged by the Draghi report:

[https://commission.europa.eu/document/download/ec1409c1-d4b4-4882-8bdd-3519f86bbb92_en?filename=The%20future%20of%20European%20competitiveness_%20In-](https://commission.europa.eu/document/download/ec1409c1-d4b4-4882-8bdd-3519f86bbb92_en?filename=The%20future%20of%20European%20competitiveness_%20In-depth%20analysis%20and%20recommendations_0.pdf)

[depth%20analysis%20and%20recommendations_0.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2025/769550/EPRS_ATAG(2025)769550_EN.pdf) pg 5; and the European Parliament plenary last April:

[https://www.europarl.europa.eu/RegData/etudes/ATAG/2025/769550/EPRS_ATAG\(2025\)769550_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2025/769550/EPRS_ATAG(2025)769550_EN.pdf)

Planning reform

In the context of planning, two pertinent issues are: (a) The interpretation of guidelines by planning authorities; and (b) judicial review proceedings. While efforts have been made to reform the system, issues still remain and ongoing reform is necessary.

a) Interpretation of Guidelines by Planning Authorities

Divergent interpretation of national planning guidelines among planning authorities has contributed to inconsistency in their application. While the guidelines are intended to provide clarity, such variations can lead to unpredictable outcomes for development proposals.

National efforts to accelerate renewable energy projects must not be undermined by altering County Development Plans in such a way that they restrict the development of new wind farms. The uneven application of guidelines can delay projects and introduce administrative inefficiencies that reduce certainty for applicants seeking to deliver the core, strategic infrastructure the State requires. By extension, this regulatory uncertainty ensures the State continues to fall short of meeting its climate targets, as it ultimately locks out developers from the market.

A uniform interpretation of the guidelines is required. This would improve the consistency of decision-making and reflect broader national objectives conducive to the delivery of such infrastructure.

b) Issues with judicial review proceedings

The general scheme of the Criminal Law and Civil Law (Miscellaneous Provisions) Bill 2026⁷ includes targeted reforms to the system for judicial reviews. All proposals to narrow the threshold

⁷ <https://www.oireachtas.ie/en/bills/bill/2026/1/>

for leave for judicial review applications should be carefully considered to ensure that spurious claims are mitigated appropriately.

While the proposed reforms may help streamline judicial review overall, it is not a guaranteed fix and risks frontloading complexity. Accounting for this will involve ensuring that adequate resources are in place in the lower courts to deal with the increased number of applications they will likely have to process.

c) Scale of fees in Environmental judicial review proceedings

As stipulated in our submission on s.294 of the Planning and Development Act 2024 (Scale of Fees),⁸ we support a structured scale approach for costs in environmental judicial review proceedings.

A transparent scale of fees is conducive to improving cost certainty and reducing the likelihood of disputes over legal costs. For businesses involved in infrastructure delivery, such predictability is critical. Uncertainty often leads to delays in project timelines, increased financial risk and diminished investor confidence; all of which can have broader implications for the provision of essential infrastructure and economic growth.

A structured scale of fees would also help ensure that environmental judicial review proceedings remain proportionate to their complexity and scope. By reducing variability in cost outcomes, a scale-based system promotes fairness and consistency across cases which will additionally help streamline the administrative process for courts and litigants alike.

⁸ <https://chambers.ie/wp-content/uploads/2026/01/Chambers-Ireland-submission-on-the-Consultation-on-the-regulation-of-costs-payable-in-matters-prescribed-on-foot-of-section-294-of-the-Planning-and-Development-Act-2024-Scale-of-Fees.pdf> pg4.

Questions

Community Benefit Funds (CBF)

- a) Do respondents see any benefit in terms of increased certainty of CBF contributions by moving to a funding model based on deemed energy output?

While we recognise the efforts made to simplify administration, we do not support moving to a deemed energy output basis for CBF contributions. CBF should remain a vital component of the just transition and the proposal to move to deemed output using unrealistic capacity factors would increase cost and uncertainty. This in turn would likely be reflected in higher bid prices across the auction. Retaining the current approach of contributing to local communities in direct proportion to the energy actually produced should be prioritised.

- b) What impact, if any, would such a change be likely to have on RESS bid prices?

There would be an increase in bid prices as developers internalise more certain lifetime CBF costs.

RESS 6 Support Duration

- a) Would an increase/decrease of five years to the RESS 6 support period (to a baseline of 20 or 10 years respectively) have a positive impact in terms of suppressing RESS 6 bid prices and overall costs to the consumer? Please quantify these impacts over the full operating life of a project comparing the minimum necessary revenues for a representative project over a 15-year support period vs a 10- or 20-year support period.

Extending support to 20 years would have a positive effect by lowering bid prices and reducing annual revenue recovery pressure and financing risk, whereas reducing to 10 years would do the opposite. The effect on consumer costs is nuanced: lower strike prices help in low-market-price scenarios, but consumer exposure under a two-way CfD also depends on wholesale prices over time.

- b) Would a longer RESS support duration of 20 years with a gradual phase-out of support over the additional 5-year support period have a positive impact on project financing and bid prices? What level of reduction of strike prices over that period would be appropriate, e.g., 10% per annum, 20% etc.?

We do not favour the tailing-off of support in the additional years as this would serve to undermine the benefits of increased support duration.

- c) In a scenario where support is phased out over a period of 5 years as per question (b) above, would it be more effective to introduce:
- i. a greater reduction of strike prices per annum over the additional support period, but retain the obligation for a project to make difference payments to the PSO at its original (i.e., higher) strike price, or
 - ii. a gentler reduction of strike prices per annum but with the requirement that the obligation to make difference payments to the PSO applies to the adjusted, reduced strike price?

Option (ii) is less distortionary than option (i). Option (ii) also avoids a mismatch between the fundamental price signal and the difference-payment obligation and still provides clear consumer protection if prices fall.

- d) Alternatively, would a longer RESS support period with a gradual phase down of the supported volume of electricity produced have a positive impact on project financing and bid prices? What would be an appropriate rate of reduction in this case?

Volume tapering can work but it can be less bankable than strike tapering. Cutting the covered MWh in years 16–20 increases merchant exposure just when debt tails rely on stable cover ratios. If adopted, a gentle volume taper could be explored (for example 5–10% of baseline

eligible volume per year across years 16–20) and potentially paired with minimum-floor protections. However, it should be noted that this also directly raises merchant risk, which could erode the bid-price benefits gained from longer tenor.

Capacity Factors

- a) The Department proposes to increase the onshore wind and solar technology capacity factors to 45% and 14% respectively. Do respondents feel these are an accurate reflection of current capacity factors in Ireland, notwithstanding dispatch down levels?

It is important that capacity factors are updated for RESS 6 to reflect increased technology efficiencies and to ensure that developers can adequately assess the potential renewable energy projects. This will stimulate greater confidence in the Irish market and attract more investment, as more accurate projections will allow stakeholders to make informed decisions about financing and scaling.

Onshore wind at 45% is not empirically supported by national-scale performance data,⁹ solar at 14% is credible but still sits above typical observed output. A 45% capacity factor materially overstates expected performance, particularly when curtailment, system constraints, outages and availability losses are fully reflected. Capacity factors at this level are not representative of average achievable output across the Irish onshore wind fleet. The Department should base assumptions on verifiable production data and apply sensitivity ranges to avoid underestimating the revenue required for project delivery.

⁹ <https://www.seai.ie/sites/default/files/publications/Community-Toolkit-Onshore-Wind.pdf>; and https://rdm.geohive.ie/datasets/9d89e909fed147c79b4dcd58c51fc557_0/about

Relief Events

- a) Can you provide, on a confidential basis, examples of recent JR or SO delay timelines for projects currently in the development pipeline?

While we do not possess confidential case studies, we can confirm on foot of extensive consultation with members that judicial reviews and operator delays are material and therefore highly relevant for Relief Events design. For JRs, projects can be delayed by 12–24 months depending on High Court scheduling, appeals, and remittal processes. In terms of SO delays, these are often arising from factors such as resourcing constraints, inflationary pressures, supply-chain disruption and regulatory approvals, rather than operational performance.

- b) Would an extension of the RESS Relief Events window, for example to a maximum of 3 years, provide greater investment certainty for projects competing in future auctions, and therefore result in lower bid prices?

Yes. A longer Relief Events window directly improves investment certainty. JR and system-related delays can exceed the current window

which forces projects into risk premia or bid suppression. Accordingly, a 3-year window better reflects realistic development risk in the current planning and grid environment. An extension would support bankability particularly for large or grid-intensive assets and this would help put downward pressure on RESS bids.

- c) Are there any potential negative consequences of an extended Relief Events window in terms of costs to the consumer or potential speculative participation in the auction?

The major risk is under-delivery due to inflexible timelines rather than speculative behaviour. A well-designed three-year Relief Events window, paired with stronger entry criteria will improve overall delivery rates and help facilitate a decrease in financing risk.

Eligible Technologies

- a) Do you agree that it is appropriate to limit eligibility for future RESS auctions to onshore wind, solar PV and hybrid projects incorporating one or both of those technologies and/or electricity storage?

Supports should not be limited to a small number of technologies given that the State will require a multitude of technologies in order to meet its climate targets.

- b) What are the barriers which have prevented technologies such as hydropower and biofuel CHP generators from participating in RESS auctions to date? Can you provide any examples referring to any such projects currently in the development pipeline and the challenges to participation in the scheme that they have faced?

At a high level, these technologies face structural cost, scale, planning, and fuel-supply challenges that impacted their suitability for competitive auctions. This was confirmed by the absence of successful bids in RESS 1-4 despite eligibility. Consistent with our answer to question a), as the scope and scale of technologies develop, any consideration of limiting eligibility should be taken into account the importance of being technology neutral.

- c) Are there any alternative support measures, in line with the CISAF, which could be considered by the Department to provide a route to market for these technologies?

- Upfront CapEx grants to reduce high development costs.
- Technology-specific premium tariffs (outside RESS) for hydro/CHP.
- Small-scale / micro-generation support scheme for sub-1 MW projects.
- Technology-specific mini-auctions separate from wind/solar.
- Enhanced capacity-market support for firm, low-carbon CHP.
- Feasibility & development-stage grants (planning, EIAs, studies).
- Dedicated grid-connection pathway for niche/small projects.
- Long-term offtake contracts for dispatchable green generation (e.g. CHP).

Technology-Specific Auction Pots

- a) Do you agree that implementing separate auction pots for each eligible technology is the most appropriate approach for future RESS auctions in the context of the required introduction of the NZIA resilience criteria?

Introducing separate technology-specific auction pots is the most practical and effective way to apply the NZIA resilience criteria in future RESS auctions. This approach acknowledges that the resilience requirements will impact each technology differently, while still maintaining competitive tension and efficient price discovery.

Moreover, separate pots can be implemented using mechanisms already provided for in the existing RESS Terms and Conditions, avoiding unnecessary complexity or delays to the auction process.

Unrealised Available Energy Compensation (UAEC)

- a) To what extent would the removal of UAEC in future RESS auctions, alongside the introduction of the new Energy System Integration criteria, improve the business case and/or provide additional incentive for hybrid generation and storage projects to be developed under the scheme?

UAEC should be retained. The inclusion of Energy System Integration (ESI) as a criterion under NZIA will not mitigate the need for UAEC, which is driven by system-level realities. There is uncertainty around future levels of dispatch down a lack of clarity in how storage could reduce the need for UAEC. Removal of UAEC at this point would reduce secured volumes and put upward pressure on bid prices.

In addition, UAEC is designed to address system-level risks that are outside the control of developers, namely oversupply and system-wide curtailment. It does not compensate dispatch down arising from local network constraints that are identifiable at the point of bidding. As such,

UAEC does not remove incentives for developers to consider system integration solutions where these are viable.

Exemptions from NZIA non-price criteria for projects under 10MW

- a) Are smaller projects likely to be unduly impacted by the new NZIA non-price criteria, particularly the Resilience and Energy System Integration criteria, compared to larger projects?

Yes, on the basis that patterns observed in recent RESS auctions clearly show that small-scale and higher-cost technologies already struggle to compete, even without additional non-price requirements. Only large onshore wind and solar projects have cleared recent RESS auctions, while all other eligible small-scale or non-wind/solar technologies (hydro, biomass CHP, biogas CHP, hybrid configurations) failed to secure any contracts in previous auctions. This shows that small projects already face structural disadvantages in competitive processes.

It is arguable that such projects are more sensitive to administrative or compliance burdens, given that smaller or more complex technologies still could not clear the auctions despite the T&Cs for RESS 5 allowing a broad range of technologies.

Repowering

- a) Is there an enduring need for RESS to offer a route to market for repowering projects?

Yes. Repowering is essential for maintaining the State's onshore wind contribution to 2030 targets. A significant portion of the fleet is approaching end-of-life,¹⁰ and a large share of the installed capacity needs repowering before 2030. Without a dedicated route to market, these MWs risk falling out of the system.

¹⁰ <https://iea-wind.org/wp-content/uploads/2026/02/Ireland.AnnualReport2024.Publish.pdf>

Maintaining repowering eligibility within RESS enables continued use of high-quality wind sites, existing grid connections, efficient utilisation of existing infrastructure, and the retention of local employment and community benefits. As more wind farms approach end of life, ensuring repowering can access a reliable route to market will be critical to sustaining Ireland’s renewable generation capacity.

While the current eligibility criteria provide clarity, the requirement for a 50% increase in deemed annual electricity output can be restrictive. Repowering projects are often constrained by planning, environmental conditions, turbine spacing rules and site-specific characteristics. Modern turbine technology can still deliver substantial gains in efficiency, reliability and performance even where installed capacity or turbine numbers change only modestly.

A more flexible approach is therefore recommended. The 50% output-increase requirement should be replaced with structural eligibility criteria (such as the decommissioning of existing turbines and installation of new generating equipment) while competitive auctions continue to ensure support remains limited to what is necessary. This would avoid unintentionally excluding viable sites that can continue contributing to renewable generation through repowering.

- b) Are there any additional measures which could be implemented to mitigate the risks of overcompensation or cumulation of aid for repowered projects, particularly where the costs of such projects have the potential to be significantly lower than greenfield projects? For example, a separate auction pot for repowered projects with its own auction parameters/competition ratio, a lower price cap within each technology pot for repowered projects of each technology, etc.

While not an exhaustive list, the following proposals should be considered:

- Facilitating a separate repowering auction pot so that repowered assets do not compete unfairly with greenfield projects.
- Implementing a lower price cap for repowered projects within each technology pot to reflect lower infrastructure and grid costs.

- Reduced bid-bond requirements but tighter milestone obligations to ensure serious participation.
- c) Can you provide any details as to the expected difference in investment costs between a greenfield wind or solar site and a repowered site of the same technology?

While no specific data is available at the time of writing, repowering avoids major costs. These frequently manifest as grid connection infrastructure, substation works, and numerous civil works.