

15<sup>th</sup> March 2022

TDPNI Consultation 2022  
SONI Ltd  
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Sent by email only: [info@soni.ltd.uk](mailto:info@soni.ltd.uk)

**Re: DRAFT Transmission Development Plan Northern Ireland 2021-2030**

Dear Sir/Madam,

We, DW Consultancy Ltd (DWC), are wind farm project developers operating in both Northern Ireland and the Republic of Ireland. We have been active in the Northern Irish wind industry for approximately twenty years. Over that time, we have developed a large portfolio of operational and consented (c.200MW+) onshore wind farm projects. We welcome the opportunity to respond to SONI's DRAFT Transmission Development Plan Northern Ireland 2021-2030.

As members of **RenewableNI**, we fully support the wider response prepared and submitted by RenewableNI to this Review. In addition, we provide hereunder our observations and comments in response to the Draft Plan.

### **Dynamic Line Rating**

The ***Shaping Our Electricity Future*** roadmap jointly published by EirGrid and SONI in November 2021 identified 'Potential transmission network reinforcements' which included two dynamic line rating (DLR) installations (see references at Table 2, Figure 5, Table 9, Section 5.4.2, Figure 22, Table 25, & Table 26). However, the DRAFT Development Plan Northern Ireland 2021-2030 makes no reference to these essential schemes to facilitate the connection of additional renewable generation at clustering substations in the west of Northern Ireland.

DLR technology is an established method of maximising the use of transmission assets, which is commonly, and successfully, used throughout Europe. Indeed, we understand that NIE Networks has recently been completing trials using this technology on their infrastructure. In addition, we are aware that EirGrid are currently tendering this technology for use in RoI. These schemes can be installed with minimum interruption, lower costs, and much quicker timeline than other deeper reinforcements. We would urge SONI to include these two schemes within the final TDPNI for 2021-2030.

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### **Addressing Climate Change v Accelerated Ambition**

SONI's *Tomorrow's Energy Scenarios Northern Ireland 2020* (TESNI 2020) which was published in July 2020 set three different scenarios setting out Pathways to deliver NI's contribution towards an overall net-zero emissions target for 2050. These scenarios were

1. **Modest Progress**, which sought **60%** of electricity from renewables by 2030;
2. **Addressing Climate Change**, which sought **70%** of electricity from renewables by 2030; &
3. **Accelerated Ambition**, which sought **80%** of electricity from renewables by 2030.

The Department for the Economy published their updated Energy Strategy to 2050 in December 2021 with a key target being to '*Meet **at least 70%** of electricity consumption from a diverse mix of renewable sources by 2030*'.

SONI's previously referenced *Shaping Our Electricity Future* roadmap '*provides an outline of the key developments from a networks, engagement, operations and market perspective needed to support a secure transition to at least 70% renewables on the electricity grid by 2030 – an important step on the journey to 80% and to net zero by 2050.*'

The Draft TDPNI makes reference to the *Shaping Our Electricity Future* roadmap and the 70% target is frequently referenced.

However, the NI Assembly very recently (9<sup>th</sup> March) agreed on the **Climate Change Amendment Bill**<sup>1</sup>. The Climate Bill was amended to include clause 15.—(1) "***The Department for the Economy must ensure that at least 80% of electricity consumption from renewable sources by 2030.***" This is an update of the 70% by 2030 set out in the Departments Energy Strategy published last December.

Our query is whether the planned network developments detailed within the current DRAFT TDPNI achieve the 70% or 80% RES-E target by 2030. If it is the former, then can the final TDPNI be amended to consider what additional developments would be required to achieve the 80% target?

We further understand that EirGrid are currently working on amending their work to adjust the RoI target from 70% to 80% by 2030 and would ask that SONI also seek to amend the Shaping our Electricity Future in the coming year to recognise this improved and accelerated target set by the NI Assembly.

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<sup>1</sup> <http://www.niassembly.gov.uk/globalassets/documents/legislation/bills/non-executive-bills/session-2017-2022/climate-change/ml1----climate-change---full-print-version.pdf>

## **Project Timelines**

SONI are to be complemented on their **Shaping our Electricity Future** roadmap published in November 2021. This is a comprehensive and ambitious piece of work which sets out a roadmap to achieving at least 70% of electricity by 2030<sup>2</sup>. The second paragraph of this report under *Section 1.1 Introduction* perfectly captures the fundamental context of the issue at hand:

*“The EirGrid and SONI corporate strategies are shaped by climate change and the need for a secure transition of the electricity sector to low-carbon, renewable energy. The context of climate change is well understood and beyond scientific doubt. **The only question now is how fast society can respond to limit the damage and therefore protect our planet for current and future generations.**” [emphasis added]*

It is very encouraging and welcoming to see SONI highlight the need for urgency when it comes to delivering on these targets, something which is often overlooked by many other stakeholders.

Whilst the Draft TDPNI improves on the delivery date of some work items, e.g. the North West Voltage Support, the Coolkeeragh - Killymallaght - Strabane 110kV Uprate, Part 1 of the Castlereagh – Hannahstown 110kV Reinforcement, & the Tamnamore – Drumnakelly 110kV uprate, all of which have improved estimated completion dates, it is somewhat disappointing to see so many work items with revised estimated completion dates many slipping by 2 to 4 years since the last iteration of the TDPNI.

The recent announcement by the Assembly of the improved target of 80% RES-E by 2030 matches with the Accelerated Ambition as set out in the TESNI 2020. Therefore, the emphasis within the final TDPNI must be on accelerating projects.

As an example, we have seen the **Omagh Main – Dromore Third Circuit** which is described by SONI as being required for ‘*security of supply and RES integration*’ but the draft TDPNI now revises the estimated completion date from 2029 to 2031 due to ‘*reprioritisation of projects*’. This seems counter intuitive in the face of the need for accelerated ambition.

SONI has and continues to deliver an unparalleled system in terms of renewable integration, and the ambition and understanding of the TESNI 2020 and SOEF reports are very laudable. However, we believe that this ambition and desire to decarbonise must be better reflected within the TDPNI.

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<sup>2</sup> Note as referred earlier the new even more ambitious target of 80% now set by the NI Assembly under the Climate Bill



Yours Sincerely,

A handwritten signature in blue ink, which appears to read "Barry O'Kane", is written over a horizontal black line.

**Barry O'Kane**

**For and on behalf of:**

**DW Consultancy Ltd**

**cc. Doreen Walker,      Director, DW Consultancy Ltd.**