Large Energy Users Connection Policy Review,
Commission for Regulation of Utilities,
Belgard Square North, Dublin D24

Emailed to: electricityconnectionpolicy@cru.ie

19th March 2024

EDF Renewables Submission to CRU's Review of Large Energy Users Connection Policy Consultation

EDF Renewables (EDFR) Ireland is part of one of the world's largest electricity companies and our investment and innovation in renewable energy projects is bringing down costs for consumers and delivering significant benefits for communities. EDFR Ireland's team has a wealth of experience in bringing complex development projects to fruition, across onshore and offshore wind (OW), solar PV and battery storage technology, and is supported by almost 4,500 colleagues globally.

In 2020 we acquired 50% of Codling Wind Park, Ireland's largest Phase 1 offshore windfarm located off the coast of Co. Wicklow, and 100% of Wexford Solar, which includes eight solar projects across Ireland. In 2023 we also acquired 50% of both Emerald and Western Star, two proposed floating offshore wind (FLOW) developments which we aim to be part of Ireland's offshore wind Future Framework. In total, we have an Irish onshore development pipeline of almost 1 GW. We have constructed and energised three of the first utility-scale solar farms in Ireland in Wexford and Kilkenny and have announced five new onshore wind projects in the past two years. We continue to assess M&A and JV opportunities and are actively looking at battery co-location options for all our renewables projects.

EDFR welcomes the opportunity to again engage with the Commission for Regulation of Utilities (CRU) and respond to this consultation on the Review of Large Energy Users Connection Policy. We would like to take this opportunity to highlight the following points, as set out in our response to the 2023 Call for Evidence Paper: -

- **Sustainable Data Centre Deployment:** As a renewable energy developer, we are in favour of the sustainable deployment of data centres in Ireland. At a global scale, there is a strong case to position data centres in Ireland, provided that can be supplied by renewable electricity. This is not an option yet in many other parts of the world, where the centres might be developed.

- **Location and timing of LEUs:** In addition, if the data centres were to be located near to the renewable generation sites, that would help to ease grid pressure, or at least not add to it. However, at present, the electricity transmission system is continuing to struggle to securely accommodate data centres and it may not be possible to meet the additional demand by new renewable generation for some years to come until the grid infrastructure has further developed. As highlighted in the consultation, in this scenario there could therefore be an increase in carbon emissions in the short-term from dedicated CCGTs. Fundamentally, locating data centres in Ireland powered by renewables is a positive outcome, however, there is a potential challenge on the relative timing of the new data centres and

EDF Renewables Ireland
Unit B, Ground Floor, Portview House, Thorncastle Street
Dublin 4
D04 V9Y9, Ireland

new renewable generation. We would support the development of a secure, low-emission route to enable new data centres to be powered by new renewables.

- **Increased obligations to secure RES-E:** EDFR would welcome increased obligations on data centres to secure renewable power in Ireland. We believe that the proposed CRU approach to allow new data centres to proceed is reasonable, however, this should be on condition that they demonstrate a net zero carbon overall impact on the system right from the start. We agree with CRU's view that there needs to be continuous progress to deliver climate targets, and for there to be no additional emissions released now.

- **Private Wire:** EDFR would like to highlight the point that private wires are not currently permitted in Ireland. If they were, then this would mean that the infrastructure pressure could be mitigated by the datacentre or the renewable generator project through a private wire development, rather than by EirGrid. Also, putting in place the necessary private wire regulation would open the possibility of using private wire connections to other projects and sectors, which could help accelerate progress towards a net zero electricity system.

In conclusion, we would like to thank the Commission for Regulation for Utilities for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Stella Burke on stella.burke@edf-re.ie, or me. I confirm that this letter may be published on the CRU website.

Yours sincerely,

DocuSigned by:
Jenny Howard
25C0079B2B4C4D6...

Jenny Howard
EDF Renewables Head of Development Ireland