

Consultation on TSO and TAO Transmission

Revenue for 2016 – 2020

Following your invitation to make submission we at AMP / SAFE (www.safelines.ie) would like to make the following submission. We understand the desire of ESB/ Eirgrid to run a business and make a profit but it should be remembered that no matter what the cost of any such project it is the TUoS customer who pays. Realistically then, said customer should have a say in the process.

We have a number of concerns namely

- the method of transmission
- the need for the developments
- health issues
- the costs of projects and lack of transparency of same

We take as an example in our own area The Flagford to Srananagh 220kV project (North Roscommon/ South Sligo) that was completed and energised 2012. Before it was built we were told that the cost of the project would be £29 million (€36.5 million) [p67 EIS]. Incidentally, taking a direct route in this instance would have halved the cost of the project.

While it has been very difficult to decipher the figures, it would appear from figures available through the national media, that the project has cost **multiples** of the original figure. This appears to be have been the case all over the country with similar projects.

No proper consultation with local people was carried out; no alternative routes were given and no oral hearing was granted. Furthermore, the need for the line was never elaborated on and there was no EMP (environmental management plan). Devaluation is a serious issue for everyone within a few kilometres of the overhead lines. EMF, in particular the non-thermal effects, is also a major health issue. At all times we

requested that lines be put underground for this project and for others of a similar nature.

ESB/Eirgrid have argued that it costs more to place lines underground. We disagree on this point because underground cables, using the most up to date technology such as HVDC light, is the most efficient and economical way forward. The company involved in building the Interconnector, ABB (www.ABB.com), has said that under normal conditions costs are similar, using modern technologies. The cables are installed close in bipolar pairs with anti parallel currents thus eliminating the magnetic fields whose effect on health are a huge source of concern.

Because EMF is an exclusion on our insurance policy and ESB/Eirgrid have refused to give indemnification, we have grave concerns regarding people's health resulting from the emissions from overhead lines. This is why we always requested the underground option. It is ironic to note that for nearly eleven years we have written to ESB/Eirgrid for a copy of their insurance regarding EMF cover. While they always said they had cover, it transpired that said cover 'expressly excludes third parties' i.e. the public. We only discovered this when we managed to persuade them to send us a copy of the document following the ratification of the Aarhus convention and the relevant Statutory Instrument.

ESB/Eirgrid are pushing ahead with grandiose plans for what they describe as an updated transmission system. It is blatantly obvious that the projects are being used to export power from windfarms. There is a decrease in the consumption of electricity nationwide. It is not just the recession that has caused such a decrease. - superior insulation in houses; LEDs ; more efficient electrical appliances; decrease in the cost of Photo Voltaic and Solar panels together with a heightened awareness of energy consumption, all contribute towards an ongoing decrease in demand on a national basis. It must be emphasised that our group have no real interest in the transmission of electricity, rather the method of transmission is our concern and what we want is the safest method that will eliminate EMF and thus the untoward health effects i.e. place cables underground as detailed. The potential cost savings would be huge as it would take less time and much less compensation would be paid out.

It must also be asked why there is a refusal on the part of ESB/Eirgrid to publish the true cost of all and any projects i.e. transparency is lacking as is the absence cost breakdown. Incorrect information on consumption and demand in the first instance caused the proposed need to be grossly exaggerated.

It should also be noted that ESB/Eirgrid continue to pay their staff excellent (even exorbitant) salaries as well as having a blatant disregard for the austerity measures endured by the rest of the population, again resulting in increased cost to the customer. Not to be forgotten either is the PSO levy at circa €325.3 million for the next levy period which runs from 1st October 2015 to 30th September 2016.

Given that the various proposed Grid projects are to take power from the windfarms and for export, it is incumbent on the investors / developers to pay at least a fair share for their construction. The Transmission Use of System (TUoS) customers are not benefiting from their construction so the question must be asked why we/they are being forced to pay the entire cost of projects that are of no benefit to anyone other than the developers. We therefore object to the proposed increase in charges; at the very least a thorough investigation of costs with full disclosure, accountability and transparency is necessary.

Yours etc

Martina Roddy; Margaret Mulligan; Frank Mulligan;