

RE: CRU/18/119 GreenWire Electricity Interconnector

To:- electricityinterconnectors@cru.ie

Dear Sir / Madame

Bord na Móna (BnM) welcome the opportunity to respond to the GreenWire Electricity Interconnector consultation paper. While this is a short response, it reflects a general BnM policy position while also acknowledging the valuable work done to date by the CRU and the substantial body of analysis that will be required to underpin the final decision.

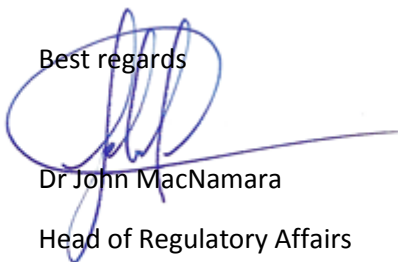
In principle Bord na Móna (BnM) support the position of increased cost effective interconnection with European electricity markets.

It is generally accepted that cost effective interconnection facilitates increased variable renewables on the physically coupled power systems, which is a policy position supported by BnM. However, it is necessary that prior to the development of any such interconnectors a comprehensive cost benefit analysis (CBA) is carried out which clearly and objectively demonstrates the saving for consumers on both sides of the connection.

In addition, the *ex ante* analysis must also examine the risk allocation to consumers in the two countries and clearly demonstrate that such risks are shared in an equitable manner.

Finally, it is assumed that optimum efficiency for interconnectors is achieved between markets where the rulesets are harmonised and under the ultimate jurisdiction of a single arbitrator – hence, the robustness and stability of the wholesale market in the jurisdiction that Ireland connects to must be also be considered in the CBA and risk assessment.

Best regards



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