

07<sup>th</sup> November 2022**Emailed to UR:**

## **SBM Offshore response to the SEM Committee’s Consultation on Firm Access Methodology in Ireland**

SBM Offshore welcomes the opportunity to respond to UR’s consultation on proposed modification to the SEM Committee’s consultation on Firm Access Methodology in Ireland.

SBM Offshore has traditionally carried out activities in the oil and gas sector including design, supply, installation, operation and the life extension of floating production solutions over the full lifecycle. The Company is market leading in leased floating production systems with multiple units currently in operation globally. SBM Offshore has been building on this offshore engineering experience to develop innovative solutions for the renewable energy market. SBM Offshore has developed a floating platform for floating wind which is light and modular, has low motions and accelerations at nacelle level. The floater is easily installable with light and standard means and has a reduced seabed footprint, is easy to decommission which leads to a competitive cost of energy. SBM Offshore is working with EDF Renewables to provide its proprietary floating wind solution for a 25 MW pilot project to be installed in the Mediterranean Sea (“Provence Grand Large”).

The Company has recently decided to move into project development for early commercial floating wind projects, as a way of progressing projects in markets which are considered suitable for the early deployment of the technology. Northern Ireland has been identified as a key market in this regard. SBM Offshore has commenced project feasibility work and has identified several suitable sites for development off the east coast of Northern Ireland. The development team has been established and a number of initial studies are underway or complete including; grid studies, technical site validation and engineering studies.

SBM Offshore is committed to working closely with the relevant policy makers, the Utility Regulator and key stakeholders in Northern Ireland to develop early commercial floating offshore wind projects in line with our ethical commitments which are to conduct business in a sustainable way over the long term by developing close relationships with local people, communities and businesses in Northern Ireland and by safe guarding the natural environment.

## Policy Context

The UK Government has set in legislation a requirement for a ‘net zero’ economy by 2050. As the leader in decarbonisation, the power sector will have to achieve zero carbon first, with heat and transport expected to significantly electrify as the main way of cutting emissions. The International Energy Agency has stated that all advanced economies must achieve zero carbon power by 2035<sup>1</sup> and the UK Government has made a commitment to achieve this<sup>2</sup>.

Working in conjunction with Wind Energy Ireland and RNI, SBM is committed to driving policy to deliver zero carbon power on the island of Ireland by 2035. This can only be achieved if the necessary level of renewable generation and the required zero carbon system services, are facilitated by the electricity network.

## SBM Comments on Q19

SBM appreciates the opportunity to respond to SEMC’s consultation on firm access in Ireland, and will focus on responding particularly to Q19 in the consultation document;

*Comments are invited from respondents on the need to consider this proposed methodology in relation to the equivalent approach taken in Northern Ireland. Do respondents have any views on the interactions and differences between these different approaches.*

**In the first instance, SBM would emphasize the need for NI to be included in a firm access methodology review in Ireland.** In order to maintain the integrity of the SEM, it is crucial that there is a joined-up approach in place on the island of Ireland between NI and ROI. We note the current differences between the two approaches, and would emphasize that in order to have an effective market, similar approaches must be adopted North and South.

In order to facilitate this, it is important that SONI commits to updating the connection policy in NI in a timely and effective manner so that a firm access policy can be reviewed and implemented in NI without delay.

When considering firm access for NI, we would also emphasize that the key objective of firm access is to provide investor confidence while minimizing the cost to consumers. This is best achieved if developers have certainty on firm access that they can use to inform their bids.

---

<sup>1</sup> Pg 20, *Net Zero by 2050*

<sup>2</sup> <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

We would like to thank the UR for the opportunity to engage on this matter and look forward to continuing our work with you in future.

Yours sincerely,



---

Niamh Kenny

Project Director – North Channel Wind