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LETTERMORE ENERGY STORAGE PROJECT, CO. DONEGAL

Pre-Application Consultation Request Report under Section 182E of the Planning and Development Act 2000 in respect of a proposed Energy Storage Facility in Lettermore, County Donegal.

Prepared for:

FuturEnergy Ireland Development DAC

FuturEnergy Ireland

Date: **May 2026**

Document No:

P25164-FT-XX-XX-RP-PL-0002

Unit 3/4, Northwood House, Northwood Crescent,
Northwood, Dublin, D09 X899, Ireland

T: +353 21 496 4133 | E: info@ftco.ie

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www.fehilytimoney.ie

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REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
0	Final	JH/KB	CA	TB	08/05/2026

Client: FuturEnergy Ireland Development DAC

Keywords: Strategic Infrastructure development, Pre-Application Consultation Request, Long Duration Energy Storage, Under the Fence, UTF Transformer Compound.

Abstract: The following Report sets out a request for pre-application consultation in respect of proposed 'Under the Fence' (UTF) Transformer Compound and Drumkeen Substation works associated with a proposed Energy Storage Facility adjacent to an existing 110kV network substation within the townlands of Lettermore and Aughkeely, west of Drumkeen, Co. Donegal.

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1. INTRODUCTION

1.1 Prospective Applicant Details

Details of Prospective Applicant	Details of Prospective Applicant's Agent
FuturEnergy Ireland Development DAC 27/28 Herbert Place Dublin 2 Project Contact: Joseph Kelly Email: info@futurenergyireland.ie. Tel: 01 669 8565	Fehily Timoney and Company Unit 3/4, Northwood House, Northwood Crescent, Northwood, Dublin, D09 X899 Project Contact: Conor Auld E-mail: conor.auld@ftco.ie Tel: 01 658 3500

1.2 Project Outline

FuturEnergy Ireland Development DAC (FEI) (hereunder referred to as the Prospective Applicant) wishes to commence pre-application consultation with An Coimisiún Pleanála (ACP) under Section 182E of the Planning and Development Act 2000, (as amended).

The Prospective Applicant intends to develop a Long Duration Energy Storage (LDES) Facility as shown on Figure 2-1 and 2-2 to provide long-duration energy storage to support the penetration of renewable energy generation onto the national grid.

The Proposed Development includes an 'under the fence' (UTF) transformer compound adjacent to the existing Drumkeen 110 kV network sub-station. The transformer compound (hereunder referred to as the 'UTF Transformer Compound') is required to enable the connection of the LDES Facility to the national grid. The Drumkeen 110kV Substation will also require works to accommodate the UTF connection to the LDES Facility (note these works are only to facilitate this connection). Figure 2-2 below identifies the key components of the Proposed Development.

This consultation request relates to the UTF Transformer Compound and Substation works only because this is the only part of the Proposed Development that includes 110kV electrical infrastructure. The remainder of the Project shall comprise medium or low voltage electrical infrastructure.

Following the conclusion of the pre-application consultation process, and subject to a determination by An Coimisiún Pleanála (ACP) that the Proposed Development is not classified as Strategic Infrastructure Development (SID), the Prospective Applicant intends to submit a planning application for the Proposed Development in its entirety to the Local Authority.

1.3 Legal Interest

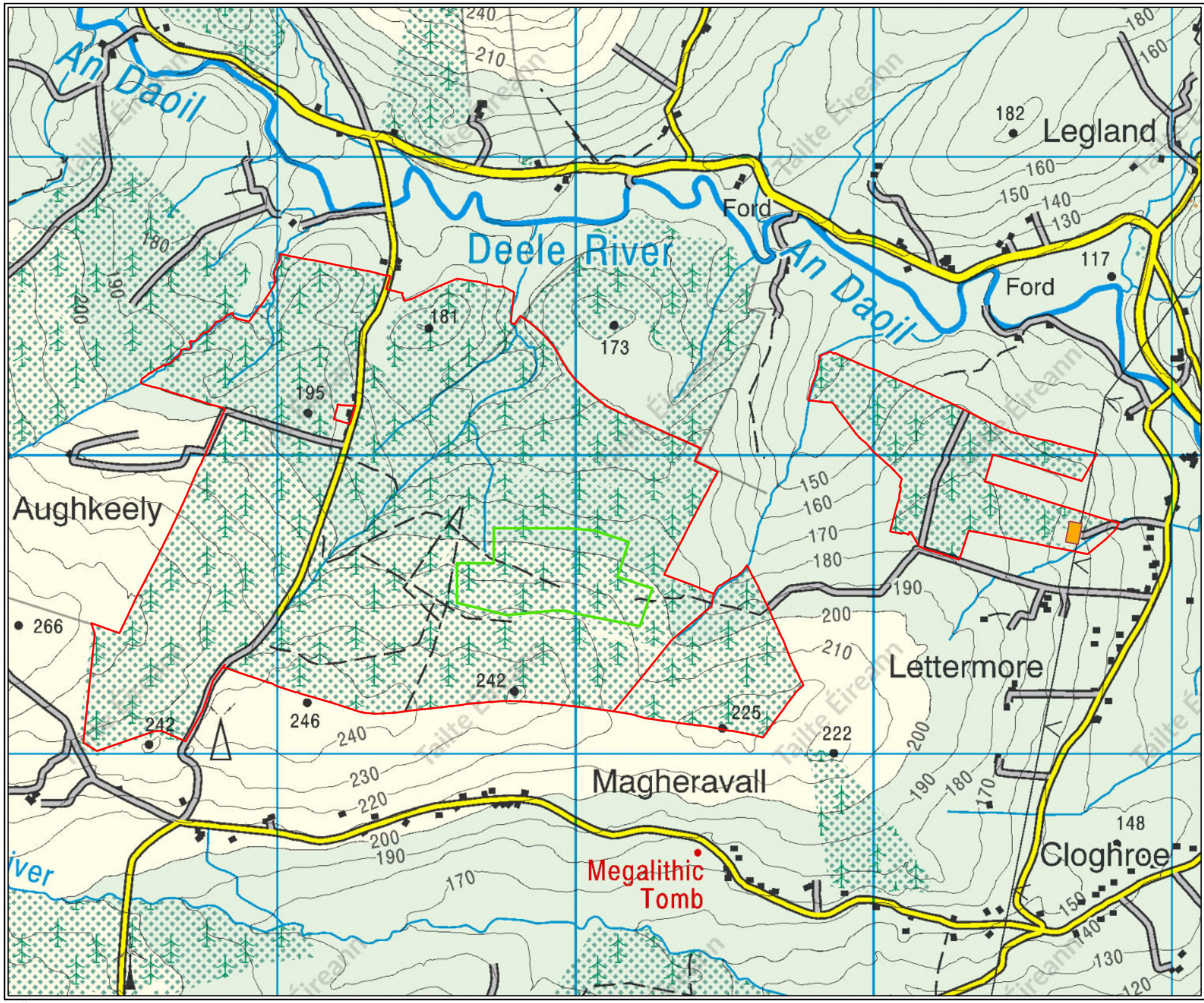
For the information of the Commission, it should be noted that the lands in question are in the ownership of Coillte CGA. FuturEnergy Ireland is a joint venture between ESB and Coillte CGA. Please find attached letter from the landowner, Coillte CGA to facilitate the pre-application consultation.

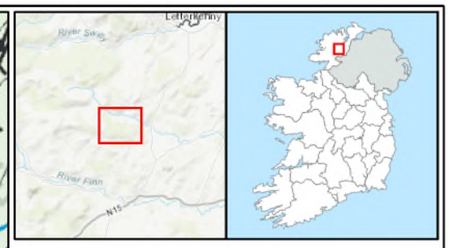
2. SITE LOCATION AND CONTEXT

2.1 Description of Site Location

The Proposed Development site (the 'Site') is located in Lettermore, County Donegal, approximately 13km south of Letterkenny (Figure 2-1). The lands shown in Figure 2-1 show the overall development site, which comprises the proposed LDES facility, substation, and associated infrastructure. The Proposed Development site is situated within a rural, upland setting which is currently occupied by commercial forestry plantation, with an existing access point from the public road, and existing internal forestry tracks across the site. The construction of the Proposed Development will require forestry felling to facilitate the construction of the facility.

The Site is characterised by steep topography which is underlain by quaternary deposits, primarily consisting of peat. Preliminary geotechnical assessments indicate an acceptable margin of safety for peat stability across the developable area. Specific locations where peat depths have been recorded at ≥ 1.0m have been identified as requiring further intrusive probing and detailed analysis.





Legend

- Site Boundary
- LDES Compound
- Existing Drumkeen 110kV Substation

0 0.5 1 2 Kilometers

TITLE:	Site Location		
PROJECT:	Lettermore LDES		
FIGURE NO:	1		
CLIENT:	FuturEnergy Ireland		
SCALE:	1:12,500	**REVISION:**	0
DATE:	11/02/2026	**PAGE SIZE:**	A3

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Legend

- Site Boundary
- LDES Compound
- Existing Drumkeen 110kV Substation
- UTF Transformer Compound
- Proposed Substation Expansion
- Power Blocks

N
W E
S

0 0.5 1 2 Kilometers

TITLE:	Site Layout Plan		
PROJECT:	Lettermore LDES		
FIGURE NO:	2		
CLIENT:	FuturEnergy Ireland		
SCALE:	1:12,500	**REVISION:**	0
DATE:	11/02/2026	**PAGE SIZE:**	A3

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3. NATURE AND SCALE OF PROPOSED DEVELOPMENT

3.1 Introduction

The facility utilises containerised Iron-Air battery technology. A high level layout of the Proposed Development is shown in Figure 2-2.

The Proposed Development and associated works will consist of the following elements:

- LDES Containers - Note not subject of this SID Pre-App Request.
- 33kV Collector Network and UTF transformer Connection
- Works to existing 110kV Drumkeen Substation

LDES Containers

The proposed LDES compound will contain iron-air batteries, which are based on the principle of reversable rusting. While discharging, the battery breathes in oxygen from the air and converts iron metal to rust. While charging, the application of an electrical current converts the rust back to iron and the battery breathes out oxygen.

This technology is designed and produced by Form Energy, an American company founded in 2017.

There are a number of benefits to this technology, such as:

- Safety: There is no risk of the thermal runaway mechanism common which can be a failure mode in other battery chemistries such as lithium-ion. The cells consist of electrodes and iron anodes submerged in a water-based, non-flammable electrolyte. There is no path for uncontrolled chain reactions that could lead to fire risk. The batteries also contain no heavy metals.
- Proven: Iron-air battery technology was proven viable as early as the 1970s, but the need for grid-scale electricity storage was not there. Form Energy has advanced this technology through extensive subscale and full-scale testing, along with a field deployment that has been operational since Q2 2023.
- Circularity: Iron forms the bulk of the battery by weight and can be recycled indefinitely. As such, iron-air technology offers significant end-of-life advantages, and can support Ireland's transition to a circular economy.

The Units will be arranged in an array across the site on concrete plinths.

The proposed UTF Transformer Compound will measure a total area of approximately 0.37 hectares and includes power transformers, modular control buildings and all ancillary equipment associated with the UTF grid connection.

'UTF Transformer Compound 'Collector Network and 33/110kV Transformer.

A 33kV collector Network will be installed across the site and connect the Batteries to the main UTF Transformer Compound. The UTF Transformer Compound will be located proximate to the existing Drumkeen 110kV Substation so the facilitate an Under the Fence (UTF) connection. The Transformer will step up the 33kV energy to 110kV. Components include Cable Sealing End (CSE), Surge Arrestor (SA), Traffo Disconnect / Earth Switch Disconnect (DT/DEM), Combined Current /Voltage Transformer (CT/VT), Circuit Breaker (CB), Lightning Mast (LM), Post Insulator and Busbar.

Modular Control Building

The Proposed Development will also consist of a Modular Control building to house switchgear and control panels for the operation and protection requirements for the Proposed Development. The finish of this modular buildings is High Grade steel. The buildings are approximately 18.4 m (length) x 4.0m (wide) x 4.87m (high) amounting to a total area of 358.4m^3. Associated underground electrical cabling will be fed from this module to connect primary plant equipment. All earthing requirements will be connected via an underground earth grid.

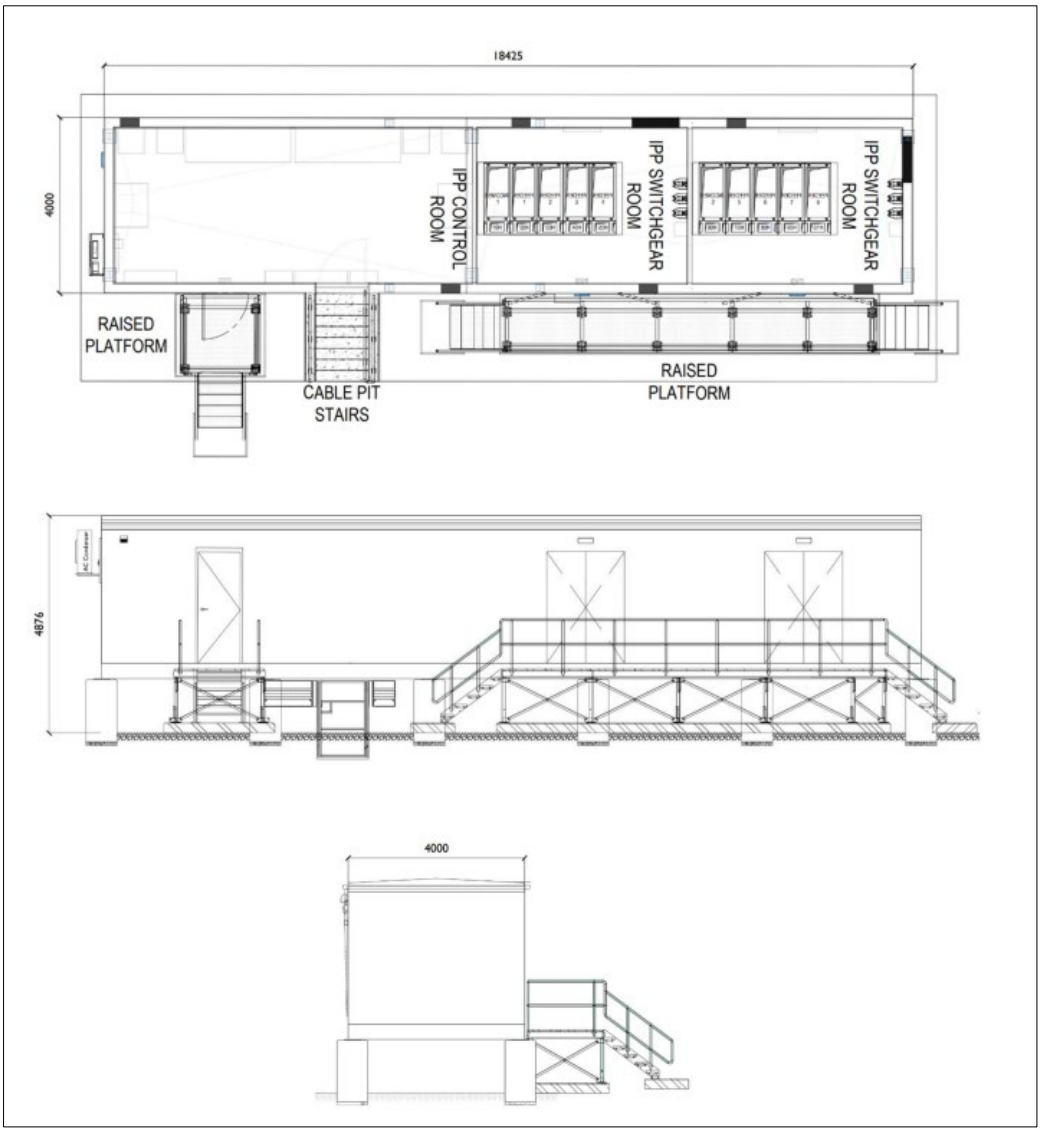

Figure 3-1: Control Modular Building Elevations and Plans

Drumkeen 110kV Substation works

A review has been carried out of Drumkeen 110kV substation, and it has been advised that for the sole purpose of connecting the LDES facility to this substation, an additional bay and busbar will be required to allow for the connection of the new line bay and all required 110kV primary plant equipment for the UTF connection.

Note that this will only serve a single private development (the proposed Long Duration Energy Storage facility) and will not serve wider local or regional development.

A list of components is as follows:

Circuit Breaker (CB)

- Current Transformer (CT)
- Voltage Transformer (VT)
- Line Disconnect/Bay Earth Switch (DL/DE)
- Surge Arrester (SA)
- Cable Sealing End (CSE)
- Tubular Busbar

Additional Grid code compliance equipment will also be sought. These components required are as follows;

- Backup Diesel Generator details
- Neutral Earthing Resistor (NER)
- Auxiliary House Transformer
- Interface Kiosk
- Marshalling kiosks
- Harmonics Filter

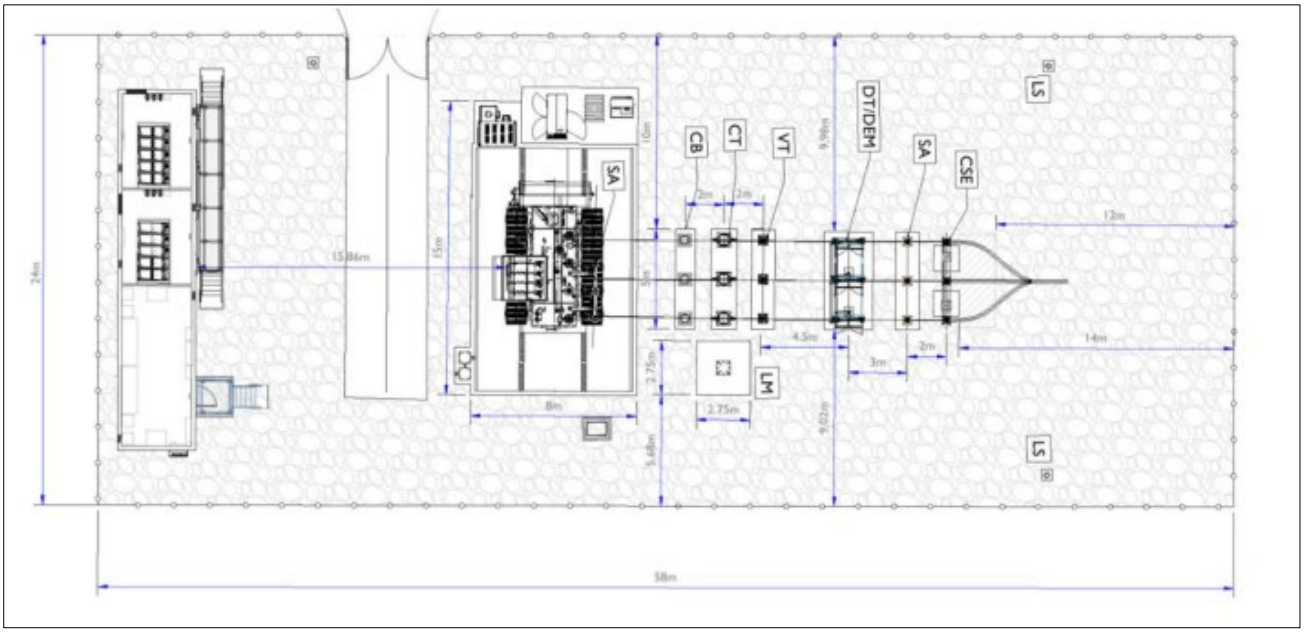

Figure 3-2: Compound Layout Plan

4. CLASS OF DEVELOPMENT TO WHICH THE PROPOSED DEVELOPMENT BELONGS

4.1 Planning and Development Act 2000 (as amended) – Section 182A.

The development subject of this pre-application consultation request relates only to the proposed UTF Transformer Compound and Drumkeen 110kv Substation works.

Subsection 1 of section 182A of the Planning and Development Act 2000 Act[1] states that where an undertaker:

> *"…intends to carry out development comprising or for the purposes of electricity transmission (hereafter referred to in this section and section 182B as 'proposed development'), the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly.*

Subsection 9 of section 182A states that:

> *In this section 'transmission' in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of:*
> *(a) a high voltage line where the voltage would be 110 kilovolts or more, or*
> *(b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."*

In section 2(1) of the Electricity Regulation Act 1999, "transmission" is defined in relation to electricity as meaning:

> *"The transport of electricity by means of a transmission system, that is to say a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers, but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system, but shall include any interconnector owned by the Board."*

'Distribution' is defined as:

> *"The transport of electricity by means of a distribution system, that is to say, a system which consists of electric lines, electric plant, transformers and switch gear and which is used for conveying electricity to final customers.*

'Electric Plant' is defined as:

> *"Any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than:*
> *(a) an electric line,*
> *(b) a meter used for ascertaining the quantity of electricity supplied to any premises, or*

[1] Inserted by section 4 of the Planning and Development (Strategic Infrastructure) Act 2006]

(c) an electrical appliance under the control of a consumer"

Electric Line:

Section 2 (1) of the 1999 ACT, as amended, states that 'electric line' has the meaning assigned to it by section 4 (1) of the ESB (Electronic Communications Networks) Act 2014. The definition set out in s.4(1) of the 2014 Act is as follows:

''…any line which is used solely or amongst other things for carrying electricity for any purpose and as including-
(a) any support for any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line may be supported, carried or suspended,
(b) any apparatus connected to or associated with any such line for the purpose of carrying electricity or electronic communications services, whether such apparatus is owned by the Board or by any company referred to in section 2 or by a company which has been provided access or services referred to in section 3, or
(c) any wire, cable, tube, pipe or similar thing (including its casting or coating) which is used for the purpose of carrying electricity or electronic communications services and which surrounds or supports or is surrounded or supported by, or is installed in close proximity to, or is supported, carried or suspended in association with, any such line.

Unlike high voltage lines planning legislation is not specific in terms of defining high voltage for substations or electrical plant.

4.2 Precedent Cases:

An Coimisiún Pleanála has determined that electrical infrastructure directly comparable to the proposed transformer associated with the Energy Storage Facility did not constitute Strategic Infrastructure in the Ballynahone LDES Project pursuant to ACP Ref. VC05e.319157. In that instance the Planning Inspector stated;

"I consider that the proposed transformer compound does not come within the definition of transmission, not being a system which consists, wholly or mainly, of high voltage lines and electrical plant used for the conveying of electricity from a generating station to a substation, from one generating station to another, from one substation to another or from any interconnector or to final customers".

Similarly, ACP has determined that the proposed works on the existing 110kV Substations do not constitute Strategic Infrastructure in a number of instances. In this regard we note the following examples;

- Proposed Extension to the Existing 110kV Slievecallan Substation (ABP- 308005-20), works to consist of additional 110kV infrastructure to extend and expand the existing substation.
- Proposed extension to Cushaling 110kV substation (ABP Ref. -304856-19), works to consist of a two bay extension.
- Proposed extension to Dunmanway 110kV Substation (ABP Ref. 303838-19), works consists of a new 110kV bay connecting to the existing busbar.

4.3 Other Precedent Cases:

Additional precedent examples by An Coimisiún Pleanála (ACP), formerly An Bord Pleanála, where electrical infrastructure broadly comparable to the proposed transformer associated with the Energy Storage Facility did not comprise Strategic Infrastructure on a number of cases include:

- ABP.301672 for 110kV transformer and connection to the national grid which will serve as a proposed Energy Storage facility with a capacity of up to 100MW in Kellistown East, Co. Carlow was not deemed Strategic Infrastructure Development by ACP on the 30th of October 2018.
- ABP.301675 for a Battery energy storage facility, 110kV substation and associated development in Caherdowney, Co. Cork was not deemed Strategic Infrastructure Development by ACP on the 30th of October 2018.
- ABP.301705 for 110kV substation and connection to the national grid (via Cashla substation) to serve a proposed Energy Storage facility with a capacity of up to 100MW in Athenry Co. Galway was not deemed Strategic Infrastructure Development by ACP on the 26th of October 2018.
- ABP.311993 for Electrical development associated with a proposed Battery Energy Storage System (BESS) and Synchronous Condenser (Sync Con) in the existing West Offaly Power Station, Shannonbridge, Co. Offaly was not deemed Strategic Infrastructure Development by ACP on the 17th of January 2022.
- ABP.316369 for a proposed transformer compound adjacent to the existing Rathkeale 110kV substation. The development included the construction of a transformer compound and "over-the-fence" connection to the adjacent Rathkeale 110kV substation at Ardgoulbeg, County Limerick. The compound would operate as an Independent Power Producer facility which would be linked by underground cable to a proposed solar farm development for which consent will be sought from Limerick City and County Council was not deemed Strategic Infrastructure Development by ACP on the 14th of June 2023.

In light of these precedent cases and the similarities of the subject development to those identified above, we submit that the proposed UTF Transformer Compound and extension to Drumkeen 110kV Substation do not constitute Strategic Infrastructure Development.

5. STATEMENT OF WHY THE DEVELOPMENT DOES NOT CONSTITUTE STRATEGIC INFRASTRUCTURE

5.1 Statement

Based on the legislative provisions and precedent provided above we make the following points:

- The proposed UTF Transformer Compound is small scale Independent Power Producer facility intended to facilitate an electrical connection to EirGrid's Drumkeen substation. It will not form part of the national transmission grid and will not act as a node in the grid. It will connect to an existing node on the grid and will not itself be a node on the grid.
- The UTF compound and the Drumkeen Substation works will only serve a single private development and will not serve wider local or regional development.
- The UTF connection to the adjacent 110 kV Drumkeen substation is only required to step up the 33 kV supply from the LDES Facility. The works on the Drumkeen substation are facilitate the connection of the LDES facility only.
- Comparable precedent cases considered by An Coimisiún Pleanala, formerly An Bord Pleanála, involving proposals for 110 kV transformers and works on the existing 110kv Substations have been determined not to constitute Strategic Infrastructure.
- The proposed UTF Transformer Compound and substation works, together with the associated generating capacity of the prospective LDES Facility are entirely located within the functional area of Donegal County Council.

As stated above, in light of these precedent cases and the similarities of the subject development to those identified above, we submit that the proposed UTF Transformer Compound and works on the Drumkeen substation do not constitute Strategic Infrastructure Development.

Based on the information in this report, and the precedence of other cases, we are happy for ACP to make a determination on this pre-application consultation submission without consulting with the applicant further. We do not feel a meeting is necessary and would like ACP to proceed to a decision as expeditiously as possible.

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APPENDIX 1

Proof of Pre-Application Fee Payment

Danske Bank

Account:	FUTURENERGY DEV DAC - IE23 DABA 9518 2320 0018 21 EUR
IBAN:	IE23DABA95182320001821
Account holder:	FUTURENERGY IR DEV - 9033346449

Danske Bank
Large Corporates & Institutions
7th Floor, The Shipping Office
20-26 Sir John Rogerson's Quay
Dublin 2, D02Y049
Telephone 01 484 2660
BIC/SWIFT: DABAIE2D
www.danskeci.com/ie

Posting details

Text:	An Bord Pleanála
Entry type:	Credit trans - BACS and EFTS
Amount posted:	-4,500.00 EUR
Status:	Completed
Entry date:	05.05.2026
Interest date:	05.05.2026
Commission date:	05.05.2026

Message

Technical posting information

Sender's reference:	41CD
Archive reference:	3858584818
System:	DANSKEBANK TELESERVICE
Source:	EAB
Transmitted on:	30.04.2026
Created on:	2026-04-30-12.33.12.631164
Received on:	2026-05-05-16.03.20.892353

Print from District 17:02 - 05.05.2026 by 2W1367 - Support Direct phone number +353 (0)1 655 0200

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APPENDIX 2

Coillte Letter of Consent

COILLTE
GROW · TRANSFORM · SUSTAIN

Joseph Kelly
FuturEnergy Ireland
27/28 Herbert Place
Dublin 2
D02 DC97
By Email Only: joseph.kelly@futurenergyireland.ie

Our Ref: CLS_LBS_LTR_685

16th January 2026

Re: Letter of Consent regarding a Pre-Planning meeting to discuss the proposed Lettermore Battery Storage project as it relates to Coillte property in Co. Donegal

Subject to Agreement/Agreement Denied

Dear Joseph,

This letter refers to the estate, right and title of Coillte Cuideachta Ghniomhaiochta Ainmnithe ("Coillte CGA") in the property outlined in red on the indicative map ("Map 1") attached hereto (hereinafter called "the Property").

We refer to the request by FuturEnergy Ireland to hold a pre-planning meeting with Donegal County Council to discuss the proposed Lettermore Battery Storage project ("the Development"). We wish to advise that we have no objection in principle to a pre-planning meeting taking place to discuss the Development which may include sections of the Property. However, before planning permission is applied for, the Development as it relates to the Property will need to be fully assessed by Coillte CGA and thereafter it will be strictly subject to an internal approval process of Coillte CGA. For the avoidance of doubt, the Development remains strictly subject to agreement with Coillte CGA which currently remains outstanding.

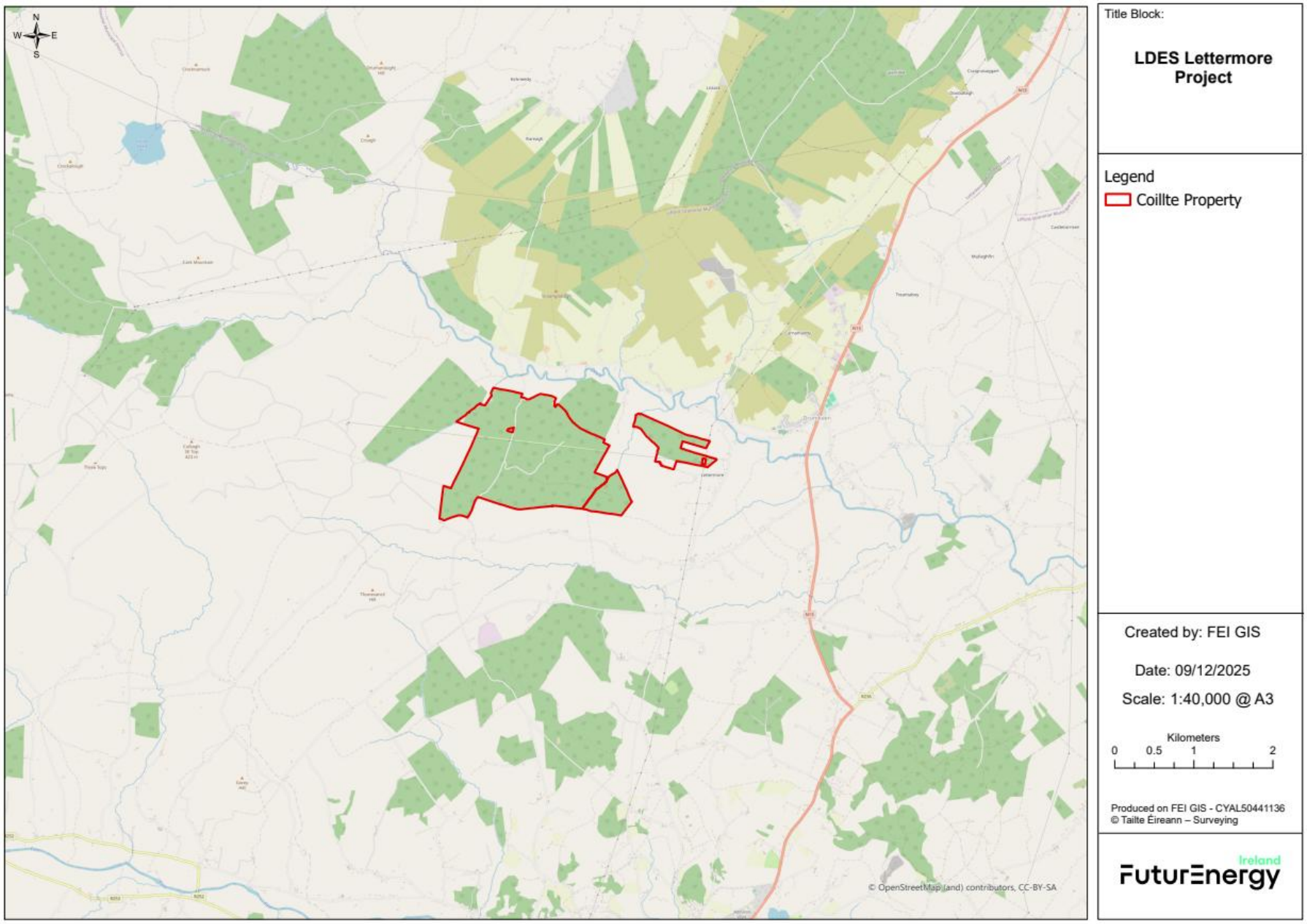
This correspondence is solely provided for you to engage in a pre- planning meeting only and for the avoidance of doubt Coillte CGA is **not** in a position to grant approval for a planning application at this juncture, however, we trust this letter is sufficient to allow you to proceed with pre-planning meetings for the Development as it concerns the Property.

Please note that I have no authority to bind Coillte CGA and no binding agreement shall exist or be deemed to exist until such a time as a formal contract has been agreed between all parties, executed and exchanged and all sums due there-under paid in full. Please note that this letter is not and shall not constitute a note or memorandum in writing for the purposes of Section 51 of the Land and Conveyancing Law Reform Act, 2009.

Yours sincerely,

Brenda Molloy
Coillte CGA
Sent by email, no signature

Map 1: Indicative Map Illustrating Coillte Property Outlined in Red



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