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Pre-Application Consultation

Lettermore LDES Grid Connection

ACP-324295-26

9th July 2026

Outline of Presentation

- Introduction & Background
- Site Location
- Site Selection & Context
- The Proposed Development
- Legislative Overview and Policy Context
- Why The Proposed Development Does Not Constitute SID
- Precedent Cases



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Introduction – The Prospective Applicant



FuturEnergy Ireland Development DAC is a subsidiary of FuturEnergy Ireland (FEI) which has been established to specifically develop this proposed project. FEI is a leading Irish wind developer established in 2021 as a stand-alone joint venture between Coillte and the ESB.

The company was formed to maximise the potential of its unique wind and land resources and to accelerate the transformation to a low carbon energy economy.

FuturEnergy Ireland is targeting the delivery of 1GW of renewable energy capacity, along with supportive energy storage facilities, by 2030.



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Introduction – Agent



Fehily Timoney (FT) is an Irish civil and environmental engineering, scientific and planning consultancy. FT is one of Ireland's foremost consultancies in energy development, having been involved in the industry since the late 1990s.

FT are acting as agent for the Prospective Applicant for this project, and are carrying out the following roles:

- Planning Consultants
- Civil Engineering Design
- Ecologists
- Noise and Vibration
- Traffic and Transport

The application is also supported by MacroWorks for Landscape and Visual Impact, and John Cronin and Associates for Archaeological Assessment.



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Introduction & Background

- FuturEnergy Ireland Development DAC (the Prospective Applicant) intends to develop a Long Duration Energy Storage (LDES) Facility in the townland of Lettermore, Co. Donegal.
- The LDES facility will mainly consist of battery containers (examples as shown in slide 13), the purpose of the LDES Facility will be to provide long duration energy storage to support the penetration of renewable energy generation onto the national grid.
- The Project also includes an 'under the fence' (UTF) transformer compound adjacent to and works to the existing Drumkeen 110 kV network sub-station. The transformer compound is required to enable the connection of the LDES Facility to the national grid. **It is this element for which Strategic Infrastructure Development (SID) pre-planning consultation is being sought with An Coimisiún Pleanála under Section 182E of the Planning and Development Act 2000 (as amended).**
- **We do not consider the proposed development (i.e. the grid connection for the LDES facility) to constitute SID Development.**



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Site Location

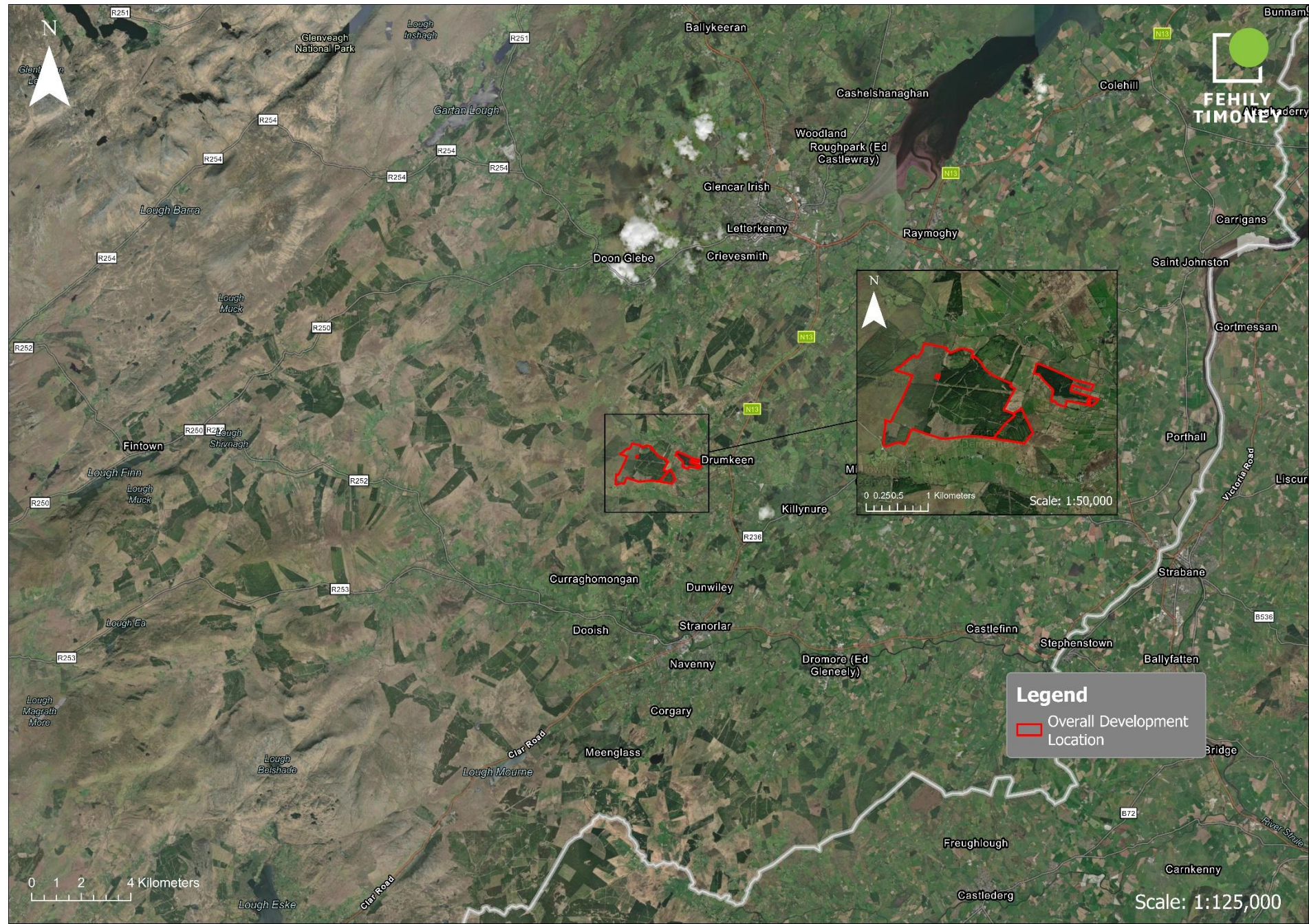
The site is located in the townland of Lettermore, County Donegal, c. 13km south of Letterkenny.

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 wider developable area.



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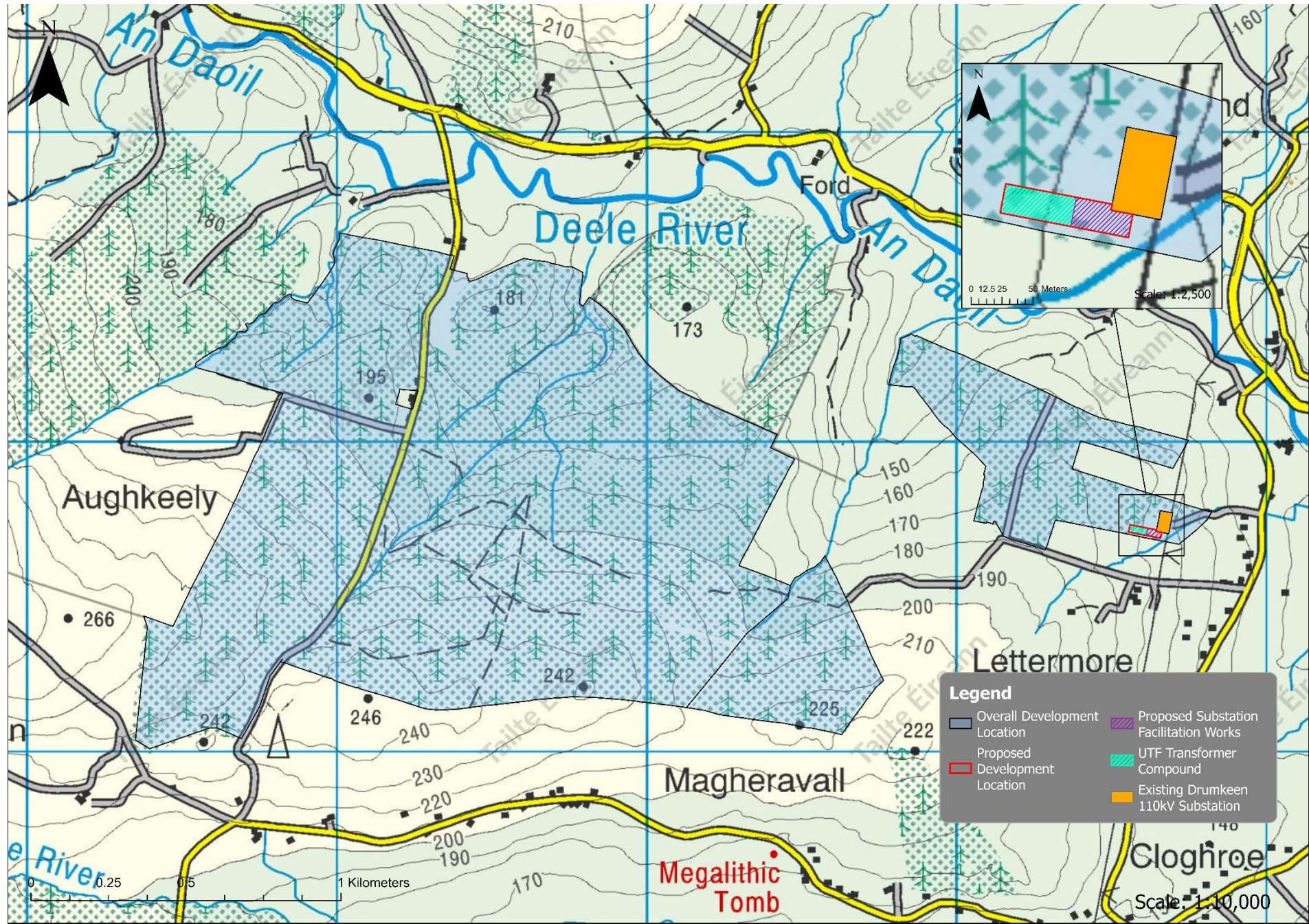
Site Location

The 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.

The Drumkeen 110kV substation is located to the north of the site.

The Dee (Donegal)_020 waterbody runs along the south-eastern site boundary.

The construction of the Development will require forestry felling to facilitate construction.



Site Selection and Context

- Proximity to the Drumkeen 110kV Substation.
- Proximity to overhead 110kV line linking to Drumkeen 110kV substation also a consideration.
- 30 no. residential receptors within 500m of overall development and 7no. mixed use receptors in same distance.



Site Context - Ecology

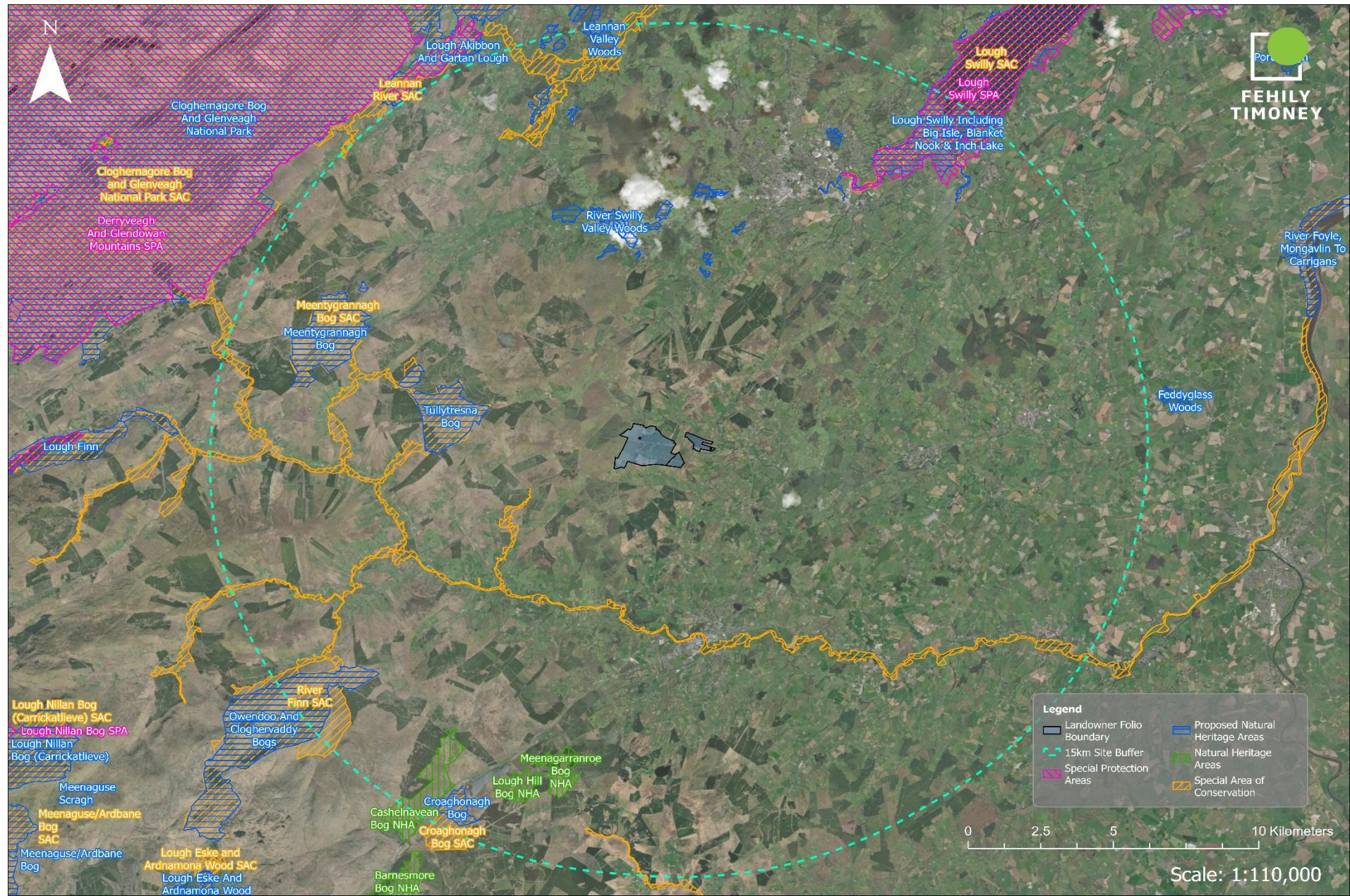
- No European or National designated sites within the site boundary.
- There are a total of 19 designated sites within 15km of the proposed development, comprising 7 European protected sites (5 SACs, 2 SPAs) and 12 Nationally designated sites (10 pNHAs, 2 NHAs).



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The Proposed Development Subject of this Consultation

The Proposed Development subject of this consultation consists of:

- 33kV Collector Network and UTF Transformer Connection.
- Works to existing 110kV Drumkeen Substation.

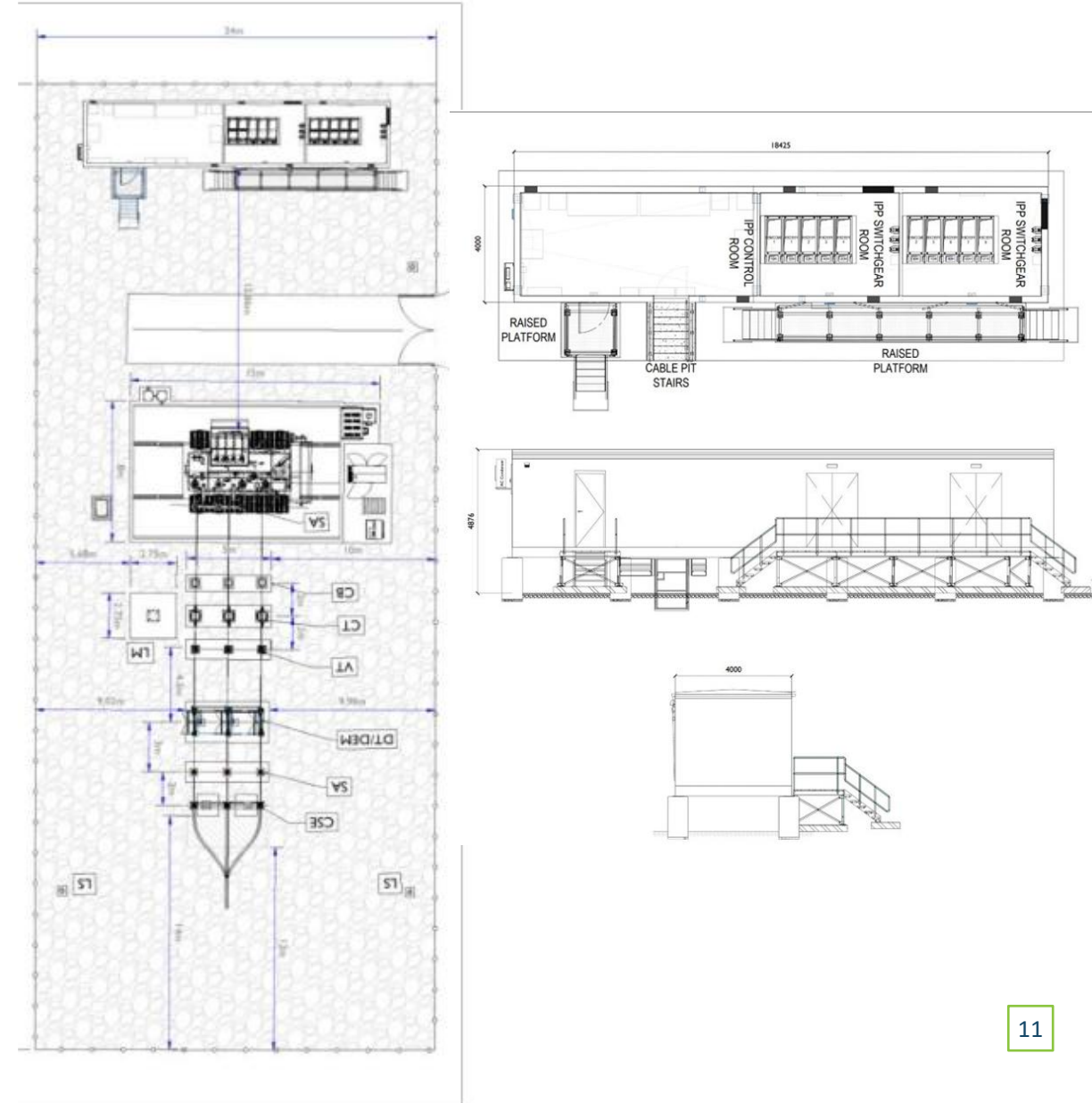
Of note also is Section 115 of the 2024 Planning and Development Act, regarding Chapter 4 Development *“Where this Chapter applies to part only of a development, an application for permission for the entire development shall be made to the Commission under this Chapter”*.

In the event the proposed development is deemed SID, must the LDES also be submitted to ACP?



Proposed Development – UTF Transformer Compound

- A 33kV collector Network will be installed across the site and connect the Batteries to the main UTF Transformer Compound.
- The term “Under the Fence” is used when a cable is run under the fence from the transformer in the developer’s/project’s compound into an existing substation.
- The UTF Transformer Compound will be located proximate to the existing Drumkeen 110kV Substation so as to facilitate the under-the-fence connection.
- The Transformer will step up the 33kV power to 110kV.
- A Modular Control building to house switchgear and control panels for the operation and protection requirements for the Proposed Development is also included.



Proposed Development - Substation Works

- A review has been carried out of Drumkeen 110kV substation, and it has been advised that for the sole purpose of facilitating the connection the proposed 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 the bay associated with these works 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 are 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

The following additional Grid code compliance equipment will also be sought:

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

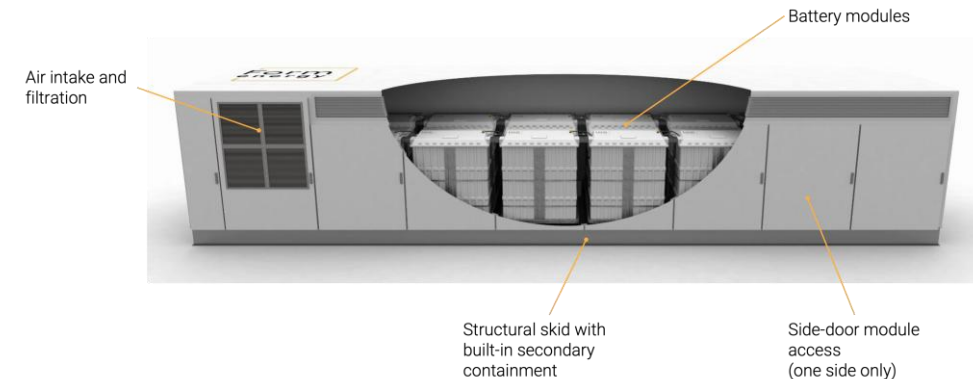
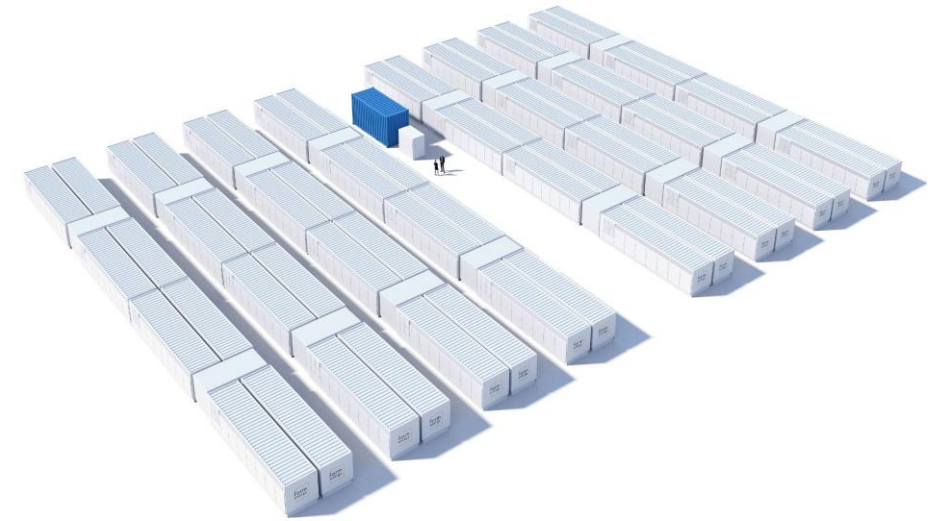


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Associated LDES Element

Whilst not subject of this SID Pre-Planning Consultation, the context of the wider LDES facility is useful to understand for context.

- The purpose of the LDES Facility will be to provide long duration energy storage to support the penetration of renewable energy generation onto the national grid.
- Subject to ACP agreeing that the proposed UTF Transformer Compound and works to the existing 110kV Drumkeen Substation are not strategic infrastructure, it is proposed to lodge one application to Donegal County Council for the proposed LDES, as well as the proposed transformer compound and link to the adjacent substation.
- 33kV underground cables will be utilised to transfer the power from the LDES compound to the UTF Transformer Compound.



Legislative Overview

Planning and Development Act 2000 (as amended)

Section 182A(1) of the Act states for the purpose of electricity transmission 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:

- ***“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.”***

Electricity Regulation Act 1999

Section 2(1) defines ‘transmission’ as:

“The transport of electricity by means of a transmission system...”

‘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 (c) an electrical appliance under the control of a consumer”*

Precedent Cases

There are a number of precedent cases where An Coimisiún Pleanála has determined that electrical infrastructure directly comparable to that proposed for this development did not constitute Strategic Infrastructure.

At SID pre-planning stage for the Ballynahone LDES Project, ACP Ref. VC05E.319157, with the same prospective applicant and same proposed development 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 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.

Precedent Cases - Additional

Additional cases where the electrical infrastructure broadly comparable to the proposed UTF Transformer Compound and grid connection **did not comprise Strategic Infrastructure** include:

- 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. **Not deemed Strategic Infrastructure Development** by ACP on the 14th June 2023.
- ABP-318491 for a proposed 33kV/110kV transformer linked to the adjacent Knockanure 220 kV substation by an underground cable going "under the fence" which will go from the transformer compound, crossing the transformer compound security fence and the field boundary hedgerow/treeline, into the Knockanure 220 kV substation to connect to the substation to a proposed solar farm development for which consent will be sought from Kerry County Council. **Not deemed Strategic Infrastructure Development** by ACP on the 27th March 2024.



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Precedent Cases - Additional

Additional cases where the electrical infrastructure broadly comparable to the proposed BESS and associated grid connection **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.

Proposed Development Not Considered to be SID

It is our position that the proposed development does not constitute strategic infrastructure development as:

- The proposed UTF Transformer Compound is small scale Independent Power Producer facility intended to facilitate an electrical connection to EirGrid's 110kV 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 Transformer Compound and the 110kV 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 proposed LDES Facility to 110kV. The works on the 110kV Drumkeen substation are facilitate the connection of the LDES facility only.
- Comparable precedent cases considered by An Coimisiún Pleanála, 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.



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