



An Coimisiún Pleanála
Strategic Infrastructure Development
64 Marlborough Street
Dublin 1

Our ref: 260235

Your ref: n/a

25th May 2026

Re: Section 182E Consultation Request - Friarstown Solar Farm Proposed Grid Connection, Friarstown, County Carlow.

Dear Sir/Madam,

MKO, on behalf of our client, Elgin Energy Services Ltd., (“the prospective Applicant”), are seeking to enter into consultations with An Coimisiún Pleanála (ACP or the Commission) under Section 182E of the Planning and Development Act 2000, as amended, (“the Act”), in relation to proposed 110kV electrical infrastructure which will facilitate the connection of the permitted Friarstown Solar Farm (Pl. Ref. 22/149) to the National Grid via the permitted 110kV Moanalow Substation and grid connection (ACP Ref. 322690) (the Proposed Development) on lands in the townland of Friarstown, County Carlow.

This cover letter provides details of the Prospective Applicant, Proposed Development Location, relevant Planning History and a development description of the Proposed Development. Finally, this letter presents an assessment of the Proposed Development against Section 182A of the Act. It is concluded that the Proposed Development does not fall within the scope of Section 182(1) of the Act for the reasons detailed below.

Prospective Applicant

The prospective Applicant for the Proposed Development, Elgin Energy Services Ltd, is a leading global solar energy company with an extensive portfolio of projects across the UK and Ireland.

Proposed Development Summary

The optimal design of the Proposed Development is still under review, with various studies and assessments required to inform the preferred grid connection design underway. The grid connection layout will consist of the provision of a new customer substation with a 33kV-110kV step-up transformer with a 33kV underground cable connection to the permitted Friarstown Solar Farm (Pl. Ref. 22/149) and a 110kV ‘Under the Fence’ cable connection to the permitted 110kV Moanalow Substation (ACP Ref. 322690). Further detail of the proposed grid connection is provided below.

Proposed Development Location

Drawing 834-FRIARSTOWN-009 enclosed as Appendix A illustrates the site of the Proposed Development. The Proposed Development site is located on lands immediately northwest of the permitted Moanalow Substation, approximately 2.2km southwest of Killerig and 8km east of Carlow town, Co. Carlow (Refer to Appendix A, enclosed). The Proposed Development site and the adjacent lands of the permitted Friarstown Solar Farm consist of agricultural land with land-use in the wider landscape comprising a mix of agriculture, forestry and one-off housing.

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Planning History

Table 1 below details the relevant planning history of the permitted Friarstown Solar Farm (Pl. Ref. 22/149) and the permitted Moanalow 110kV Substation (ACP Ref. 322690).

Planning permission for the Friarstown Solar Farm on a 68.8 ha site was granted by Carlow County Council ('CCC') on 19/05/2023 subject to 28 no. planning conditions under Planning Application Ref. no. 22/419 (the '2022 solar farm planning permission').

Planning permission for the Moanalow 110kV Substation and grid connection was granted by ACP on the 19/12/2025 under section 182A (1) of the Act (ACP Ref. 322690. This application was made on foot of pre-application discussions with the Commission under ACP-319470-24 for a proposed 110kV electrical substation and grid connection, where the Commission decided that the development would fall within the scope of section 182A of the Act and would be strategic infrastructure.

Table 1 Planning History

Planning Ref.	Development Description	Site Location	Decision	Expiry Date
ACP Ref. 312860	110kV Electrical Substation and associated Connection Options	Site of proposed Friarstown Solar and Storage Park at lands in Friarstown and Ardenhue, Co. Carlow.	Is SID 20/06/2022	N/A
Carlow CC 22/149	Solar and Storage Park Development	Townlands of Ardenhue & Friarstown, Co. Carlow	Granted 19/05/2023 by Carlow CC subject to 28 conditions	18/05/2033
Carlow CC 23/60297	Solar PV Development, 38kV Substation and Battery Energy Storage System	Grangeford Old and Friarstown, Co. Carlow, R93 PX51	Granted by Carlow CC subject to 26 conditions on the 24/09/2024.	23/09/2034
ACP Ref. 322690	Proposed 110kV Electrical Substation and Grid Connection	Located within the townlands of Friarstown, Grangeford Old, Grangeford, Moanalow, Glenoge, Rathnashannagh, Inchisland or Moatalusha, Rathoe, Kellistown East, Ballycurragh and Kellistown West, County Carlow.	Granted by ACP 19/12/2025 subject to 14 conditions	19/12/2035

Development Description

The optimal design of the Proposed Development is still under review; however, the grid connection layout will consist of the provision of a new customer substation with a 33kV-110kV step-up transformer with a 33kV underground cable connection to the permitted Friarstown Solar Farm (Pl. Ref. 22/149) and a 110kV 'Under the Fence' cable connection to the permitted 110kV Moanalow Substation (ACP Ref. 322690). Refer to drawing no. 834-FRIARSTOWN-007 enclosed as Appendix B for the proposed grid connection site layout. Refer to Figure 1 below which provides an extract of drawing no. 834-FRIARSTOWN-007.

The transformer compound would operate as an Independent Power Producer (IPP) facility which would be linked to the permitted Friarstown Solar Farm. The medium voltage (MV) power generated by the permitted Friarstown Solar Farm would be 'stepped up' to 110kV in order to connect to the adjacent permitted 110kV Moanalow substation.

The proposed grid connection will consist of the construction of a new customer substation with a 33kV-110kV step-up transformer on lands adjacent to the permitted Friarstown solar farm with a 33kV underground cable

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connection from the permitted solar farm site to the new customer substation and a 110kV ‘Under the Fence’ cable connection from the new customer substation to a 110kV bay within the adjacent permitted Moanalow 110kV substation compound (ACP Ref. 322690).

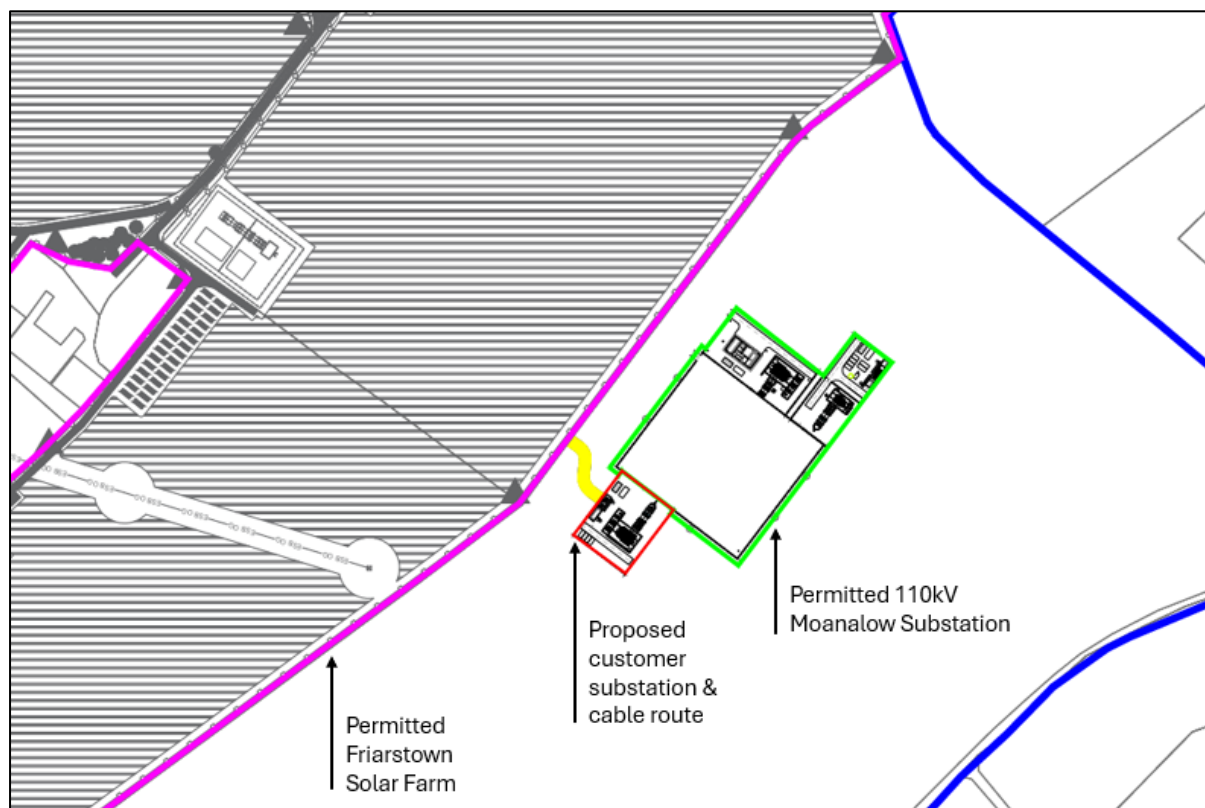


Figure 1 Proposed grid connection layout

Local Planning Policy Context

The Carlow County Development Plan 2022-2028 (hereafter Development Plan) was adopted by the Council's Elected Members on 23rd May 2022 and shall have effect from 4th July 2022. Climate change mitigation and adaptation objectives have been incorporated into the policies of the Development Plan. Chapter 7 of the Development Plan sets out the aim to combat climate change and its impacts in the County by promoting and supporting policies and objectives which contribute towards a transition to a low carbon and climate resilient future, and which focus on reducing greenhouse gas emissions and energy demands through appropriate and effective climate mitigation and adaptation measures. The Development Plan sets out a number of Overarching Policies and Objectives relating to Climate Action and Renewable Energy including the following:

- **CA P2:** *Support the transition of the County to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.*
- **RE P1:** *Encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.*
- **RE O1:** *Seek to achieve a minimum of 130MW of renewable electricity in the County by 2030, by enabling renewable energy developments, and through micro-generation including rooftop solar, wind, hydro-electric and bioenergy combined heat and power (CHP).*

There is strong policy support at local level for the development of renewable energy projects such as the permitted Friarstown Solar Farm. The Proposed Development will facilitate the connection of the permitted solar farm to

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the National Grid via the permitted 110kV Moanalow Substation (ACP Ref. 322690) and will contribute towards the 130MW County-wide renewable electricity generation target.

Section 182A Assessment

MKO consider that the Proposed Development does not fall within the scope of Section 182(1) of the Act, based upon the definition of electricity transmission as set out in 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.”*

Section 2(1) of the Electricity Regulation Act 1999 defines “transmission” in relation to electricity as follows:

“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*
- (c) quantity of electricity supplied to any premises, or (c) an electrical applicant under the control of a consumer”.*

ESB (Electronic Communications Networks) Act 2014 Section 4(1) an Electric line is defined as:

“any line which is used solely or amongst other things for carrying electricity for any purposed 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*
- 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 associated with, any such line.”*

It is MKO's professional opinion that the Proposed Development does not constitute strategic infrastructure under Section 182A of the Planning and Development Act 2000, as amended, as it does not form part of the transmission network at the permitted Moanalow substation.

The proposed 33kV-110kV step-up transformer and associated 110 kV 'Under the Fence' connection would facilitate connection of the Friarstown Solar Farm to the transmission grid, but it will not function as part of the grid or become a new node in the transmission grid.

The Proposed Development is relatively minor in scale and extent. It does not alter the nature or function of the permitted Moanalow substation. Rather, the proposed transformer compound comprises a Independent Power Producer (IPP) facility, associated with the permitted Friarstown solar farm to step up the voltage of the power generated by the solar farm to 110kV for export to the grid via the permitted Moanalow substation. The term 'Transformer Compound' or IPP is used to distinguish it from larger scale electrical infrastructure in substations which do act as nodes in the national grid. The Proposed Development will only serve the permitted solar farm, and it will serve no function with regard to the operation of the transmission network.

MKO therefore requests on behalf of the applicant to enter into pre-application consultation with ACP to formally determine if the proposed 33kV-110kV step-up transformer and associated 110 kV 'Under the Fence' connection to the adjacent Moanalow substation falls outside the scope of Section 182A of the Act.

Relevant Precedent

Table 2 below details several precedent SID determinations made by An Coimisiún Pleanála under S182A in respect of comparable grid connections consisting of a 110kV step-up transformer with associated 110 kV cable connections to existing or proposed 110 kV substations. In all the precedent cases detailed below, the Proposed Development was determined by ACP as not falling within the scope of Section 182A. These precedents are set out in Table 2 below.

Table 2 An Coimisiún Pleanála Precedent Cases

ACP Ref. No.	Location	Development Description	Decision Date	Decision
321201	Kildare	Transformer Compound	10/12/2024	Not SID
320197-24	Clare	Transformer Compound	06/11/2024	Not SID
319398-24	Galway	Transformer Compound	22/07/2024	Not SID
319395-24	Kilkenny	Transformer Compound	16/07/2024	Not SID
319157-24	Donegal	Transformer Compound	28/05/2024	Not SID
318491-23	Kerry	Transformer Compound	27/03/2024	Not SID
316369-23	Limerick	Generator Transformer Compound	14/06/2023	Not SID
315827-23	Galway	Step Up Transformer & Grid Connection	01/06/2023	Not SID
314400-22	Sligo	38kV to 110kV Step Up Transformer	01/11/2022	Not SID
312013-21	Longford	Transformer Compound	15/02/2022	Not SID

Conclusion

It is MKO's professional opinion that the Proposed Development does not fall within the scope of Section 182A of the Act and we look forward to the determination of ACP in this regard. In support of this request, we have enclosed the following documents:

- Site Location Map (Drawing No. 834-Friarstown-009)
- Site Layout Map (Drawing No. 834-Friarstown-007)

The statutory fee of €4,500 has been paid by our clients by Electronic Funds Transfer to ACP for the determination of this case (Please see Appendix C for proof of payment). We understand that €3,500 may be refunded if no pre-application consultation meeting is held or if no more than one meeting with ACP is required.

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We trust the above is in order and look forward to hearing from ACP further in due course.

Yours sincerely,

Francesca Rowson

Francesca Rowson

Senior Planner

MKO

Email: frowson@mkofireland.ie

Enclosed

- › Appendix A - Site Location Map (Drawing No. 834-Friarstown-009)
- › Appendix B - Site Layout Map (Drawing No. 834-Friarstown-007)
- › Appendix C - Proof of fee payment

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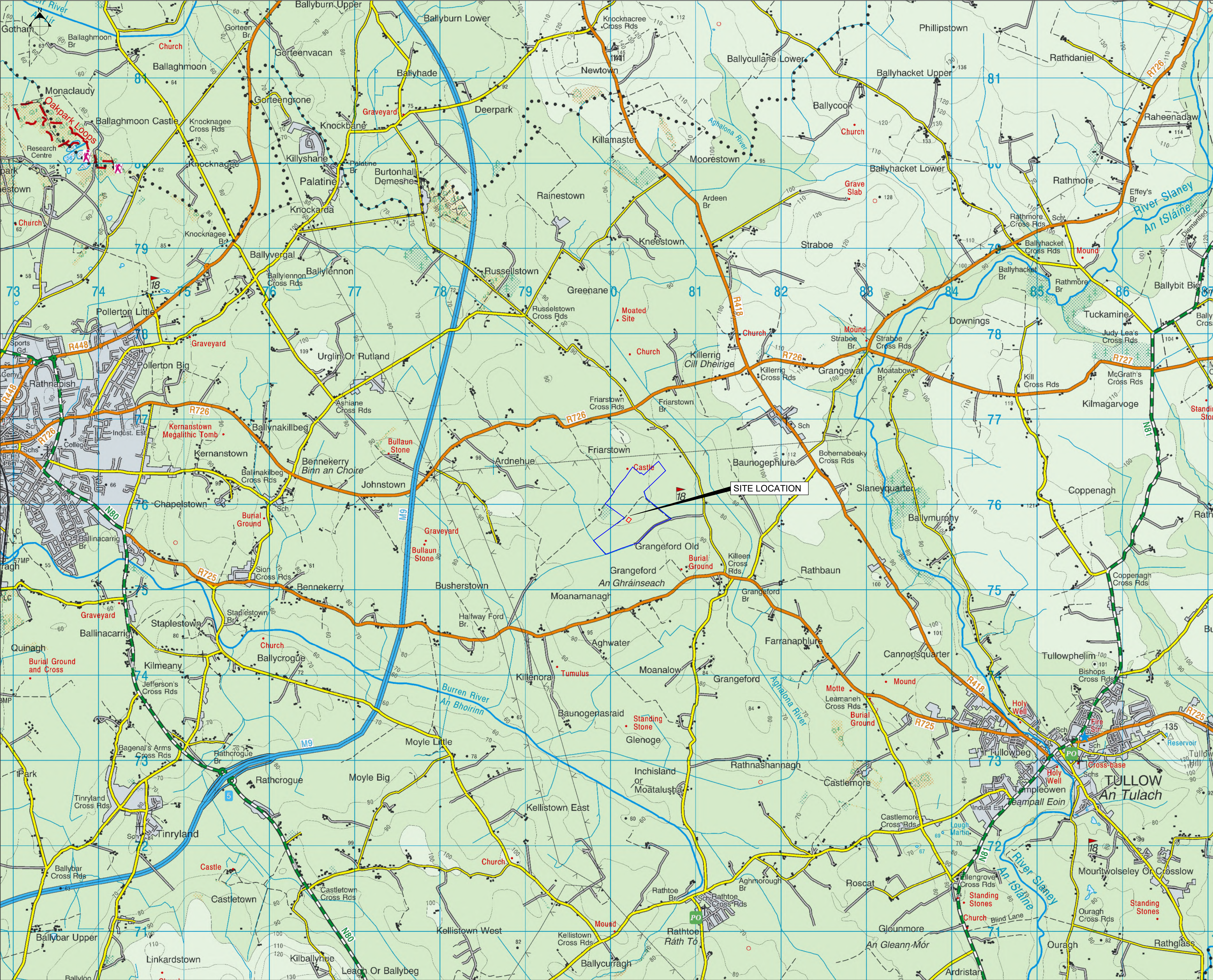
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- Notes
1. Verifying Dimensions: The contractor shall verify dimensions against such other drawings or site conditions as pertain to this part of the work.
 2. Existing Services: Any information concerning the location of existing services (above and below ground) indicated on this drawing is intended for general guidance only. All services should be checked on site prior to any work commencing.
 3. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.
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- LEGEND
- SITE BOUNDARY
 - LANDOWNER BOUNDARY

ORDNANCE SURVEY SHEET NUMBER:
OS DISCOVERY 1:50,000
Sheets Number: 2616, 2618, 2616 & 2818

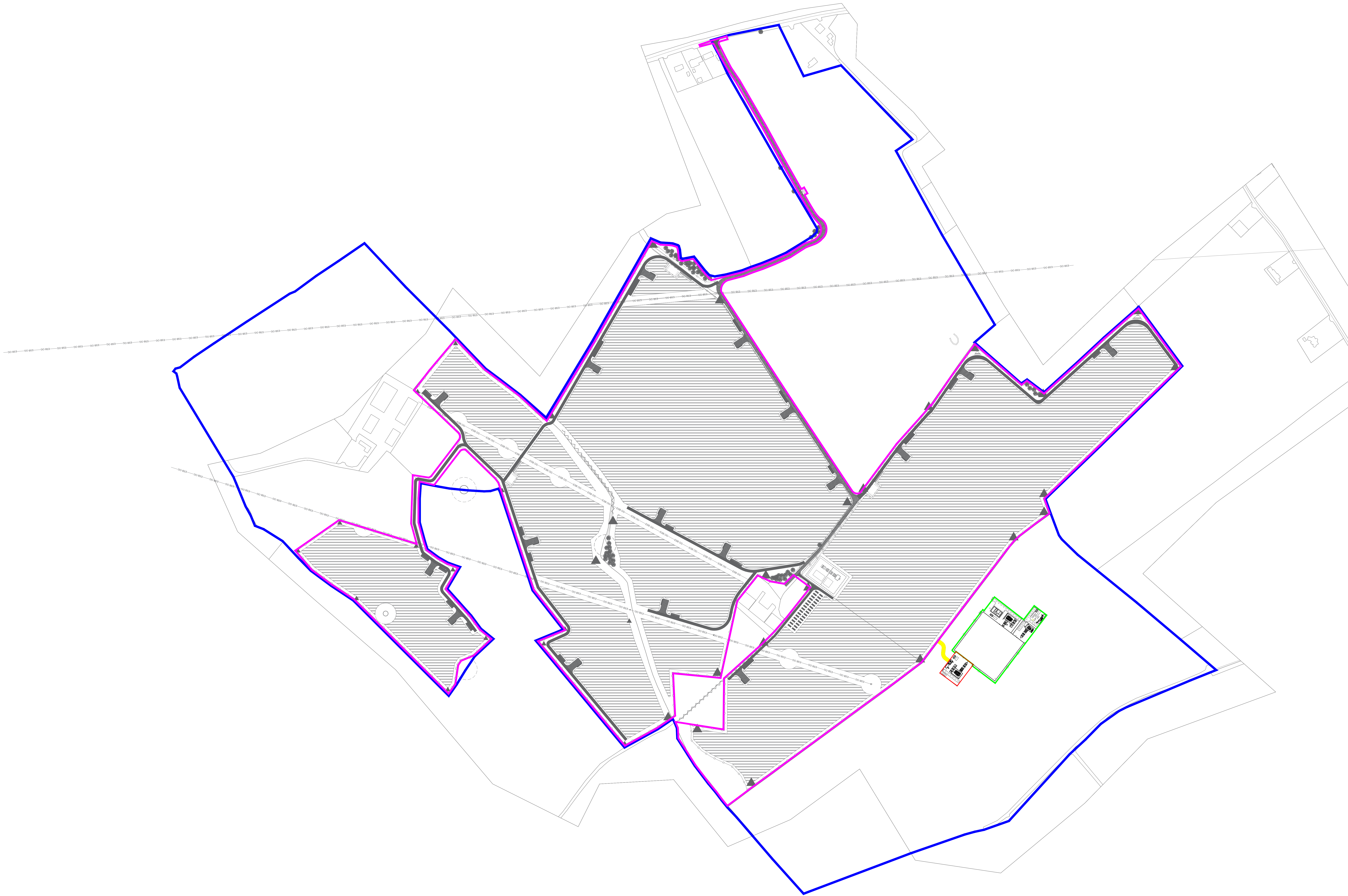
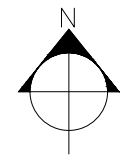
Rev	Description	By	CB	Date



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Project	FRIARSTOWN		
Title	SITE LOCATION MAP REGIONAL		
Status	Drawn By JP	PM/Checked by TH	
Site Ref 834	Scale @ A1 1:20000	Date Created 07/05/2026	
Drawing Number 834-FRIARSTOWN-009	Rev -		



SCALE BARS (Metres)

0 25 50 100 200

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LEGEND

- SITE BOUNDARY
- PERMITTED SOLAR FARM BOUNDARY - N° PL 22/149
- PERMITTED 110KV SUBSTATION - ACP REF 322690
- INTERNAL CABLE ROUTE
- LANDOWNER BOUNDARY

ORDNANCE SURVEY SHEET NUMBER:
OS 1:2,500 Sheets Number: 4358-B, 4358-D
1:5000 4359

Rev	Description	By	CB	Date
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Project FRIARSTOWN

Title SITE LAYOUT MAP

Status Drawn By PM/Checked by
JP TH

Site Ref Scale @ A0 Original Date Created
834 1:2500 07/05/2026

Drawing Number Rev
834-FRIARSTOWN-007 -

Payment Detail Report

Client name BAGGOT ENERGY SERV

Criteria may have been applied to this view. Please refer to the last page for more information.

Transaction reference number	BX26052578398557	Payment amount	4500.00 EUR	Value date	25/05/2026	UETR	d881ebb2-4011-4151-a751-fb65c909653c
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Track and trace - External bank payment history

Date and time	Action	Bank name/BIC	Deductions	Instructed amount
25/05/2026 10:27:46 BST	Processed by Originator	Barclays Bank Ireland	--	--
25/05/2026 10:27:46 BST	Processing by Beneficiary	AIB BANK	--	--

Creation details

Creation date	25/05/2026
Creator name	MARK O'DEA
Creation method	Input Payment
Channel created in	iPortal

Debit details

Debit account number/IBAN	46934300
Bank identifier	BARCIE2D
Account name	EES LIMITED EUR
Legal entity name	ELGIN ENERGY SERVICES LIMITED
Branch	Barclays Ireland
Debit amount	4500.00 EUR

Beneficiary details

Beneficiary name	AN COIMISIUN PLEANALA
Beneficiary account no/IBAN	IE70AIBK93105500316067
Beneficiary bank identifier type	SWIFTBIC
Beneficiary bank identifier	AIBKIE2D
Beneficiary bank name	AIB BANK
Beneficiary bank address	AIB10 MOLESWORTH STREET CO DUBLIN, IRELAND
Beneficiary bank country	Ireland
Beneficiary address	Dublin
Beneficiary country	Ireland
New beneficiary warning	Yes

Payment details

Priority payment	No
Payment confidential marker	No
Payment amount	4500.00 EUR
Payment type	Currency/International payment
Status	Processed
Value date	25/05/2026
Execution date	25/05/2026
Charges	Shared
Bank reference	001261
Payments details	SID PRE APP FEE

Completion details

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Debit amount	4500.00 EUR
Payment amount	4500.00 EUR
Value date	25/05/2026
Actual exchange rate	1

Cross-currency calculations are at indicative rates

Selection criteria

Format	PDF
Actionable by me	No
Created by me	No
Value date	25/05/2026
Transaction reference number	BX26052578398557
Page break	No
Errors and warnings inclusion	No
Payment history inclusion	No
User	Mark K O'Dea

Report requested date: 25/05/2026 10:57:05 (BST)