

# EU Regulation 838/2010: Methodology for Alignment in Ireland

TSO Responses

10 July 2025



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# Contents

Contents	2
1 TSO Response to Electricity Association of Ireland	4
2 TSO Response to Wind Energy Ireland	6
3 TSO Response to SSE	9
4 TSO Response to Ørsted	11
5 TSO Response to Bord Gáis Energy	13
6 TSO Response to RWE Renewables	14
7 TSO Response to ESB	15
8 TSO Response to Bord na Móna	16
9 TSO Response to Electric Ireland	17
10 TSO Response to Codling Wind Park	18
11 TSO Response to Electricity Storage Ireland	19

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# 1 TSO Response to Electricity Association of Ireland

Dear David

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Three of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support for the TSO’s proposal to provide the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is happy with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

EAI asked if EirGrid and CRU will transparently publish methodology and inputs (and associated numbers) to calculated GTUoS revenue requirement from 2020/21 to 2024/25

Four out of eleven responses expressed a desire for the TSO to provide transparency on their determination of compliance with EU Reg 838/2010. The TSO believes transparency was provided based on the formal submission of the compliance factor as part of ACER survey submissions but is happy to provide an increased level of transparency. The historical calculation of GTUoS compliance is provided as part of this recommendation paper

Calendar Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh	Tariff Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh
2013	24,413,946	49,321,696	2.0	2012/13	24,907,967	39,739,282	1.6
2014	24,546,675	56,617,289	2.3	2013/14	24,266,599	56,000,788	2.3
2015	26,816,022	57,621,031	2.1	2014/15	26,280,876	56,427,498	2.1
2016	28,812,887	60,764,376	2.1	2015/16	28,432,836	61,749,402	2.2
2017	29,527,918	58,465,575	2.0	2016/17	29,437,095	58,222,502	2.0
2018	29,322,456	61,937,562	2.1	2017/18	29,471,692	59,747,334	2.0
2019	29,481,788	69,535,314	2.4	2018/19	28,904,917	67,911,948	2.3
2020	30,738,337	75,705,099	2.5	2019/20	30,554,938	74,781,652	2.4
2021	30,123,312	76,664,850	2.5	2020/21	29,939,684	77,793,989	2.6
2022	32,172,183	75,592,184	2.3	2021/22	32,041,857	73,171,875	2.3
2023	30,017,664	88,906,915	3.0	2022/23	30,753,307	86,005,266	2.8
2024	29,567,950	87,710,329	3.0	2023/24	29,270,843	96,098,230	3.3

Exported Energy is based on "Exported Energy Statistics" dataset where Export meter data for transmission-connected units are sourced from SEM-O. Export meter data for distribution-connected units are sourced from ESB Networks’ “342” market messages.

The TSO notes that it was determined that 2021 was compliant with EU Reg 838/2010 as the rounded annual tariff divided by annual exported energy was exactly €2.5/MWh. All other years were compliant with EU Reg 838/2010 apart from 2023 and 2024 which are subject to this consultation.

The TSO will provide annual details for compliance with EU Reg 838/2010 on future GTUoS publications and will also continue to provide transparency via ACER survey submissions.

#### **Gap between GTUoS charge and refund is shortened.**

Seven out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology outlined by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

EAI noted that there is no consideration of the impact the increased DTUoS charge may have on consumers. Such analysis of these impacts to end consumers would provide greater transparency and accountability to any decision.

Five out of eleven responses expressed concern at the increase that this could have to DTUoS. The TSO shares this concern but is confined by the existing tariffing methodologies in seeking compliance with EU Reg 838/2010.

EirGrid will provide any future rebate to producers in line with recovery of same through demand tariffs. It is proposed that once a potential rebate to producers is required, this revenue will be sourced through the next available DTUoS tariff cycle and the rebate will be provided to all applicable producers, monthly, as the revenue is sourced. The shortest time lag to facilitate this on an interim basis is per the methodology outlined in this consultation. The TSO also welcomes discussions to continue for the formation of an enduring solution for compliance with EU Reg 838/210.

I trust this adequately addresses the queries raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 2 TSO Response to Wind Energy Ireland

Dear John

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Five of your queries were similar to points raised by other respondents.

Two out of eleven responses stated support provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

Eight out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology outlined by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Four out of eleven responses stated that GTUoS refunds should be indexed for inflation. The TSO acknowledge this request but note that EU regulation states that recovery of GTUoS charges cannot be indexed for inflation.

## **TSO to provide transparency on their assessment of compliance with EU Reg 838/2010.**

Wind Energy Ireland welcomes publication of calculation in the consultation. Clarity is requested on how Total Actual Revenue from producers is derived. Also, more clarity on what is included in main inputs to calculation for Ireland.

Four out of eleven responses expressed a desire for the TSO to provide transparency on their determination of compliance with EU Reg 838/2010. The TSO believes transparency was provided based on the formal submission of the compliance factor as part of ACER survey submissions but is happy to provide an increased level of transparency. The historical calculation of GTUoS compliance is provided as part of this recommendation paper.

Calendar Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh
2013	24,413,946	49,321,696	2.0
2014	24,546,675	56,617,289	2.3
2015	26,816,022	57,621,031	2.1
2016	28,812,887	60,764,376	2.1
2017	29,527,918	58,465,575	2.0
2018	29,322,456	61,937,562	2.1
2019	29,481,788	69,535,314	2.4
2020	30,738,337	75,705,099	2.5
2021	30,123,312	76,664,850	2.5
2022	32,172,183	76,592,184	2.3
2023	30,017,664	88,906,915	3.0
2024	29,567,950	87,710,329	3.0

Tariff Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh
2012/13	24,907,967	39,739,282	1.6
2013/14	24,266,599	56,000,788	2.3
2014/15	26,280,876	56,427,498	2.1
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2020/21	29,939,684	77,793,989	2.6
2021/22	32,041,857	73,171,875	2.3
2022/23	30,753,307	86,005,266	2.8
2023/24	29,270,843	96,098,230	3.3

Exported Energy is based on "Exported Energy Statistics" dataset where Export meter data for transmission-connected units are sourced from SEM-O. Export meter data for distribution-connected units are sourced from ESB Networks' "342" market messages.

Total Actual Revenue is the sum of the revenue sourced from generators by the TSO adjusted for post settlement.

The TSO notes that 2021 was compliant with EU Reg 838/2010 as the rounded annual tariff divided by annual exported energy was exactly €2.5/MWh. All other years were compliant with EU Reg 838/2010 apart from 2023 and 2024 which are subject to this consultation.

The TSO proposes to calculate any potential refund due to producers in order to maintain compliance with EU Reg 838/2010 pro-rata in the manner in which this revenue was sourced. The TSO feels this is the fairest approach and maintains the integrity of the GTUoS locational signal. The TSO accepts that it could provide increased transparency on how compliance with EU Reg 838/2010 is determined annually. The TSO proposes to provide annual details for compliance with EU Reg 838/2010 on future GTUoS publications and will also continue to provide transparency via ACER survey submissions.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

Two out of eleven responses expressed a desire to develop a process to reconcile generators that cease operation prior to the potential refund requirement being determined. The TSO can confirm that the refund methodology will align with existing processes for generators who cease operation.

Wind Energy Energy highlighted that it should be recognised that €2.5/MWh is target, not limit, EirGrid should be planning for actual to be at or less than €2.5.

We acknowledge this point, however as noted in the consultation in advance of any revision of the GTUoS methodology by the RAs the solution in the consultation is the clearest approach for meeting the dual obligations of GTUoS methodology alignment and EU compliance.

I trust this adequately addresses the queries raised. If there are any further queries or clarifications required, please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 3 TSO Response to SSE

Dear Sir/Madam

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Four of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses supported the TSO’s request to provide the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO’s view would require a modification of the existing GTUoS methodology.

Eight out of eleven responses expressed concern at the increase that this could have to DTUoS. The TSO understands this concern, but is confined by the existing tariffing methodologies in seeking compliance with EU Reg 838/2010.

Eight out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology outlined by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

**TSO to provide transparency on their assessment of compliance with EU Reg 838/2010.**

Publication of Calculation in consultation is welcome. Clarity is requested on how Total Actual Revenue from producers is derived. Also, more clarity on what is included in main inputs to calculation for Ireland.

Four out of eleven responses expressed a desire for the TSO to provide transparency on their determination of compliance with EU Reg 838/2010. The TSO believes transparency was provided based on the formal submission of the compliance factor as part of ACER survey submissions but is happy to provide an increased level of transparency. The historical calculation of GTUoS compliance is provided as part of this recommendation paper.

Calendar Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh	Tariff Year	Exported Energy MWh	Actual Revenue €	Average Tariff €/MWh
2013	24,413,946	49,321,696	2.0	2012/13	24,907,967	39,739,282	1.6
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2021	30,123,312	76,664,850	2.5	2020/21	29,939,684	77,793,989	2.6
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Exported Energy is based on "Exported Energy Statistics" dataset where Export meter data for transmission-connected units are sourced from SEM-O. Export meter data for distribution-connected units are sourced from ESB Networks' "342" market messages.

Total Actual Revenue is the sum of the revenue sourced from generators by the TSO adjusted for post settlement.

It was determined that 2021 was compliant with EU Reg 838/2010 as the rounded annual tariff divided by annual exported energy was €2.5/MWh. All other years were compliant with EU Reg 838/2010 apart from 2023 and 2024 which are subject to this consultation.

As outlined, the TSOs believe that the methodology outlined in the consultation is the fairest approach and maintains the integrity of the GTUoS locational signal. Regarding transparency on how compliance with EU Reg 830/2010 is determined annually, EirGrid will be happy to provide annual details of compliance with EU Reg 838/2010 on future GTUoS publications and will also continue to provide transparency via ACER survey submissions.

SSE have stated that it is not clear how NI is currently captured as regulation applies to countries, not markets. GTUoS numbers for Ireland, NI and All Island should be published.

This is out of scope for this consultation as NI have not encountered a breach to date and the management of this process will be carried out by the Northern Ireland TSO, SONI.

I trust this adequately addresses the queries raised. If there are any further queries or clarifications required, please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 4 TSO Response to Ørsted

Dear Sir/Madam

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Five of your queries were similar to points raised by other respondents.

Two out of eleven responses stated support for the provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

Ørsted noted that the consultation lacked significant details including the historical information, transparency on the definition of Exported Energy and Total revenue for producers and what they include and how they are measured/calculated.

Four out of eleven responses expressed a desire for the TSO to provide transparency on their determination of compliance with EU Reg 838/2010. The TSO believes transparency was provided based on the formal submission of the compliance factor as part of ACER survey submissions but is happy to provide an increased level of transparency. The historical calculation of GTUoS compliance is provided as part of this recommendation paper.

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2019/20	30,554,938	74,781,652	2.4
2020/21	29,939,684	77,793,989	2.6
2021/22	32,041,857	73,171,875	2.3
2022/23	30,753,307	86,005,266	2.8
2023/24	29,270,843	96,098,230	3.3

Exported Energy is based on "Exported Energy Statistics" dataset where Export meter data for transmission-connected units are sourced from SEM-O. Export meter data for distribution-connected units are sourced from ESB Networks' "342" market messages.

Total Actual Revenue is the sum of the revenue sourced from generators by the TSO adjusted for post settlement.

It was determined that 2021 was compliant with EU Reg 838/2010 as the rounded annual tariff divided by annual exported energy was €2.5/MWh. All other years were compliant with EU Reg 838/2010 apart from 2023 and 2024 which are subject to this consultation.

As outlined, the TSOs believe that the methodology outlined in the consultation is the fairest approach and maintains the integrity of the GTUoS locational signal. Regarding transparency on how compliance with EU Reg 830/2010 is determined annually, EirGrid will be happy to provide annual details for compliance with EU Reg 838/2010 on future GTUoS publications and will also continue to provide transparency via ACER survey submissions.

Ørsted noted that it is not clear from the consultation whether it is intended to include OG-TUOS in the revenue from producers or if offshore network developments will feature in the projects list for G-TUOS going forward.

As OG-TUoS is the mechanism through which EirGrid will recharge the Asset Transfer Value (ATV) of the offshore grid connection assets back to the offshore developer, they do not constitute part of the TUoS revenue requirement and therefore are not factored into the assessment of compliance with the Regulation. It was highlighted that as there is no forecast of G-TUOS it is very difficult for developers to estimate the impact over the lifetime of a project, noting the increase in costs between 2009 and 2023 at Kilgarvan windfarm, which could not have been envisaged by the developer at the time of developing the project. Moving towards a regime where G-TUOS can be forecasted by the SO to give more certainty would be welcome.

Ørsted strongly recommended that when establishing an enduring approach to GTUOS, a derogation from charges in the interim phase between the operation of old and construction of new repower assets. If GTUOS is charged in this interim phase could pose a significant barrier to the viability and competitiveness of projects and/or place unnecessary cost burden on consumers.

EirGrid acknowledges these issues, however, they are outside of the scope of this consultation.

I trust this adequately addresses the queries raised. If there are any further queries or clarifications required, please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 5 TSO Response to Bord Gáis Energy

Dear Eoghan

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Two of your queries were similar to points raised by other respondents.

Two out of eleven responses stated support for provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is happy with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process.

Eight out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology outlined by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Four out of eleven responses stated that GTUoS refunds should be indexed for inflation. The TSO acknowledge this request but note that EU regulation states that recovery of GTUoS charges cannot be indexed for inflation.

Bord Gáis is of the opinion that basing revenue recouped on actual energy export on a unit basis would be fairer and more accurate.

The methodology outlined in the consultation maintains the precise locational signals as determined following the application of the regulatory approved GTUoS process and any other method of providing this refund would distort this locational signal. Further, it aligns with the manner in which GTUoS is sourced from generators (i.e., as an aggregate cost rather than a site specific cost). On that basis the methodology in the consultation seems a fairer approach.

I trust this adequately addresses the points raised. If there are any further queries or clarifications required please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 6 TSO Response to RWE Renewables

Dear Cliona

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Three of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support for provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is happy with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process.

RWE have stated that while they support the proposal to provide the refund on a tariff year basis, they do not accept fully accept the proposed methodology, and believe that the refunds should be distributed back to site on basis of total installed capacity/MEC per site, same €/MW irrespective of location.

The methodology outlined in the consultation maintains the precise locational signals as determined following the application of the regulatory approved GTUoS process and any other method of providing this refund would distort this locational signal. Further, it aligns with the manner in which GTUoS is sourced from generators (i.e., as an aggregate cost rather than a site specific cost). On that basis the methodology in the consultation seems a fairer approach.

RWE stated that they would welcome broader discussions on interest payable and the opportunity to speed up the repayment of any over recovered monies.

Four out of eleven responses stated that GTUoS refunds should be indexed for inflation. The TSO acknowledge this request but note that the EU regulation states that recovery of GTUoS charges cannot be indexed for inflation.

Eight out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology outlined by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

I trust this adequately addresses the points raised in your response. If there are any further queries or clarifications required please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

## 7 TSO Response to ESB

Dear Sir/Madam

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Three of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support for provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is happy with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

Five out of eleven responses expressed concern at the increase that this could have to DTUoS. The TSO understands this concern, but is confined by the existing tariffing methodologies in seeking compliance with EU Reg 838/2010.

ESB noted that the average transmission charge trending upwards, and as well as the cap being exceeded in 2023, it is also expected that this cap will be exceeded in 2024 as well.

The TSO acknowledges this trend however as noted in the consultation, this is driven by the GTUoS methodology which is not within the TSOs remit to change. We understand the RAs are considering this.

ESB believe there is a significant need for holistic approach on how and where network charges are recovered. EirGrid understands this observation, but this is outside the scope of this consultation.

I trust this adequately addresses the points raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 8 TSO Response to Bord na Móna

Dear Sir/Madam

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Two of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support for provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

I trust this adequately addresses the points raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 9 TSO Response to Electric Ireland

Dear Sir/Madam

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Three of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses specifically stated support for provision of the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the integrity of the locational signals given as part of the application of the GTUoS process to be maintained.

Seven out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology proposed by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

EI stated that process of calculation, reviews and approvals should not delay publication of DTUoS.

There is no expectation by the TSO that that this process will delay the publication of DTUoS.

Given the impact this cap and associated rebates may have on DTUoS, EI asks EirGrid to publish the steps (and associated numbers / TUoS line-items) used to calculate the G-TUoS revenue requirement from 2024/2025 back to the 2020/2021 tariff years.

EirGrid will ensure that the calculation steps are made publicly available as part of the annual tariffing documentation.

EI stated that further consideration is required in relation to the potential for over-recovery of monies. If GTUoS Charges are recovered through the PSO) and the CRM, it could be argued that these impacted generators have already recovered the "overcharge" about the €2.5/MWh threshold. The methodology in the consultation would mean that these Generators would receive monies in excess of the €2.5/MWh threshold again through a monthly adjustment to their GTUoS invoice. This potential 'double payment' would be at the expense of the DTUoS customer. We ask that this issue is clarified before any decision is made by the CRU on the allocation of rebates to the DTUoS customer.

Neither CRM nor PSO charges constitute transmission charges within the context of the Regulation, so these have not been considered as part of the overall pot which determines the €2.5/MWh threshold.

I trust this adequately addresses the queries raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 10 TSO Response to Codling Wind Park

Dear Scott

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Three of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support the TSO's request to provide the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is satisfied with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process.

Seven out of eleven responses stated that the gap between the GTUoS charge and the potential refund should be shortened. As per defined process the DTUoS rates for the tariff year ahead need to be set by October Y-1 well before it becomes apparent if a GTUoS refund is required and the potential scale of that refund. Therefore, the funds for any potential GTUoS refund needs to be sourced by DTUoS in the subsequent tariff year. The consultation methodology proposed by the TSO provided the minimum time possible for funds to be sourced and provided to generators within the existing tariffing methodologies.

Two out of eleven responses expressed a desire to develop a process to reconcile generators that cease operation prior to the potential refund requirement being determined. The TSO can confirm that the refund methodology will align with existing processes for generators who cease operation.

Eight out of eleven responses requested further clarity on enduring arrangements to ensure compliance with EU Reg 838/2010. The TSO would also welcome the introduction of an enduring solution to the compliance of EU Reg 838/2010 which in the TSO's view would require a modification of the existing GTUoS methodology.

CWP stated in their response that it should be recognised that the €2.5/MWh cap is not a target for revenue collection but a limit, so EirGrid should be planning for the actual €/MWh to be at or less that €2.5/MWh.

We acknowledge this point, however as noted in the consultation in advance of any revision of the GTUoS methodology by the RAs the solution in the consultation is the clearest approach for meeting the dual obligations of GTUoS methodology alignment and EU compliance.

I trust this adequately addresses the queries raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis

# 11 TSO Response to Electricity Storage Ireland

Dear Bobby

Thank you for your response to the TSO Consultation on EU Regulation 838/2010: Methodology for Alignment in Ireland. Two of your queries were similar to points raised by a number of other respondents.

Two out of eleven responses stated support the TSO's request to provide the potential GTUoS refund based on the Tariff year and to be returned monthly once sourced. There were no objections. The TSO is happy with this support as it allows the TSO to maintain the integrity of the locational signals given as part of the application of the GTUoS process.

Concern was raised by ESI regarding the impact on DTUoS Charges. Overall, five out of eleven responses expressed concern at the increase that this could have to DTUoS. The TSO understands this concern, but is confined by the existing tariffing methodologies in seeking compliance with EU Reg 838/2010.

The TSO proposes to provide any potential rebate to producers as soon as the revenue is sourced through demand tariffs. The TSO proposes that once a potential rebate to producers is required, this revenue will be sourced through the next available DTUoS tariff cycle and the rebate will be provided to all applicable producers, monthly, as the revenue is sourced. The shortest time lag to facilitate this is proposed by the TSO as part of this consultation as an interim solution to maintain compliance with EU Reg 838/210. The TSO also welcome discussions to continue for the formation of an enduring solution for compliance with EU Reg 838/2010.

ESI put forward suggestions for an alternative network charging arrangement. EirGrid understands this suggestion, however it is out of the scope of this consultation.

I trust this adequately addresses the points raised. If there are any further queries please contact [tariffs@eirgrid.com](mailto:tariffs@eirgrid.com).

Regards

Michael Coone

System Support & Analysis