

Commission for Regulation of Utilities  
The Grain House  
The Exchange  
Belgard Square North  
Tallaght  
Dublin

19 March 2024

By email: [electricityconnections@cru.ie](mailto:electricityconnections@cru.ie)

**Re: Review of Large Energy Users Connection Policy (CRU2024001)**

Dear Sir/Madam,

Uisce Éireann (UÉ) welcomes the opportunity to make a submission to the Commission for Regulation of Utilities' (CRU) consultation entitled Review of Large Energy Users Connection Policy (CRU2024001). We recognise that the consultation is part of a wider plan for all stakeholder to participate towards not only regulation policy, but also government policy towards sustainable energy initiatives.

By way of background, UÉ is the national water utility for Ireland and is a fairly significant consumer of electricity, required to produce drinking water and to treat wastewater. As a public body UÉ is bound by specific climate action targets, achieving a 30% improvement in our energy efficiency between 2009 and 2020, and has a target of a 50% improvement in energy efficiency by 2030 and 51% reduction in Greenhouse Gas (GHG) emissions by 2030.

Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas emitting water and wastewater service. As UÉ accounts for circa 21% of public sector electricity consumption, we are continuously improving our energy efficiency in asset design, upgrades, lighting and heating, transport and processes.

UÉ is currently reviewing its Sustainable Energy Strategy and aims to publish an updated strategy in Q2 2024. This sustainable energy strategy will take a proactive, business-wide approach including concept design, new projects, energy retrofit programme, renewables and upskilling our people. Our strategy and energy management programme reduces our reliance on fossil fuels and counteracts the rise in our base energy demand due to infrastructure upgrades and population growth.

UÉ is implementing a multi-billion Capital Investment Plan which includes numerous strategic national projects to meet Ireland's future water and wastewater needs for housing, commercial and industrial growth as part of the Governments' National Development Plan 2021-2030. We request the CRU to consider prioritising connections to the national grid that involve strategic national infrastructure. We also believe that a coordinated approach to grid connections, planning permission and other such permits will give the best outcome towards Ireland achieving its International and EU climate commitments.

We have addressed the various sections and questions put forth in the consultation paper in broad terms below. We are happy to support the CRU in its endeavours to implement a connection policy that delivers the Government's Climate Action Plan 2023 (CAP23).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'J Johnston', is positioned above the typed name.

Justin Johnston  
Interim Strategy, Resilience and Regulation Director

## **Category and Definition of an LEU**

UÉ supports clear and transparent categorisation that is known at the time of connection, we suggest that LEU is defined by the connection size in terms of voltage – 110kV and above.

While it could be argued that connection capacity, in terms of MW, or consumption, in terms of MWh, should be used, these can change over time, either increase or decrease, which may change whether the connection party is an LEU or not. The voltage level of the connection is very unlikely to change.

## **Transition period**

With any change to policy a transition period may be necessary. Once firm policy proposals emerge, the CRU will have to undertake a regulatory impact assessment and then determine what transition period is appropriate.

## **Measuring performance**

Clear definitions of measurement criteria will need to be established. Measurement criteria will depend on what methods can be employed to achieve the obligations. Once firm policy proposals emerge then specific proposals can be considered further. Ideally an established internationally recognised system will suffice.

## **Location of LEUs**

Currently, while access to the electricity grid is an important consideration for any LEU, there are many other factors that will influence location.

These conditions should be considered on a case by case basis and determined based on each location, proximity to population centres, and application of facilities.

## **Non-firm demand connections**

“Non-firm” connections need to be fully defined including parameters of capacity and consumption.

Considering the “always on” nature of UÉ water and wastewater treatment facilities, it is difficult to foresee what a “non-firm” connection would be relevant.

## **On-site generation and storage**

Currently UÉ utilises some on-site renewable generation to offset demand (i.e. PVs, Biogas, in-pipe energy recovery, etc.) with ambitions to increase further, albeit the level of on-site generation is likely constrained given that most sites are close to urban centres.

## **Demand flexibility**

For UÉ facilities, demand flexibility is dictated by operational requirements. Where possible, UÉ participates in the market for demand side management and believes that financial incentives and a market based system is the best way to deliver this service. Placing mandatory requirements on connection parties may undermine the current market for these services.

## **Roles of other organisations**

The consultation paper highlights the need for other state/public bodies to be party to this initiative. As highlighted in the consultation paper, electricity connection policy overlaps with other policy areas including national spatial planning and national economic policy.