

Commission for the Regulation of Utilities  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

[electricityconnectionpolicy@cru.ie](mailto:electricityconnectionpolicy@cru.ie)

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## **CyrusOne Response to CRU2024001: Review of LEU Connection Policy**

Dear Sirs,

Thank you for the opportunity to provide our input to this consultation. We have contributed to the collective comments submitted by Digital Infrastructure Ireland (DII) and fully support the DII consultation response which reflects our position. However, there are several points pertinent to our individual circumstances that we would like to bring to your attention and several more generic observations that we would like to make. These are iterated below.

- **Recognition of sunk costs:** The arbitrary nature of the current moratorium imposes different impacts on operators depending on the maturity of their in-country projects and the degree of investment already made. CyrusOne has committed €200M to this project since its inception in 2018 including over €25M to fund the development of HV substation infrastructure to ensure adequate power to the site. Currently we are left with sunk costs and a stranded asset. We would be grateful for acknowledgement by CRU that projects at risk are at different stages of development and investment.
- **Recognition of existing consents and connections:** For sites that are consented and have connection agreements in place, we hope that a pragmatic interim solution can be found, in particular for those projects where the power demand is relatively modest and which therefore would not impose an unmanageable burden on supply.
- **Consistency:** The understanding of what is meant by a flex power connection has changed during the last three years. Essentially it has migrated from a temporary measure with short term effects linked to seasonal demand peaks to a full outage for up to 20 days. We would be grateful for a clear and consistent definition.
- **Operational constraints:** Colocation providers like CyrusOne are building digital infrastructure for large cloud providers to whom we provide guarantees of continuous power. Continuity of supply is the core business requirement. While we can engineer

solutions to accommodate short term outages through embedded generation and storage, we cannot provision for protracted outages. We cannot run our generators for long periods of time because we would breach environmental permitting regulations and battery storage must be replenished. A third potential option, a gas connection for the purpose of standby power, has been ruled out following a Ministerial instruction to this effect.

- **Approach to flex:** The adoption of flex power solutions will be important not just to overcome the current supply constraints but also to enable Ireland to accommodate an increasing proportion of intermittent renewables. We therefore feel that the regulatory priority should be to support the development of an effective market for a variety of flex energy products, with appropriate incentives, rather than targeting regulatory effort at customers. This encourages those consumers with activities that can accommodate flex power to adopt it, irrespective of industry sector. Data centre operators like ourselves can make a significant contribution to supporting Ireland's energy transition by accommodating certain flex products, but not all.
- **Policy alignment:** It is important that the CRU, when addressing this issue, has the fullest possible regard to Government Policy as a whole, including enterprise and industrial policy, in terms of potential impacts on business, employment, investment and the reputation of Ireland as a location for Foreign Direct Investment. It is also important that regulatory structures recognise transitional arrangements regarding previously committed and consented investments.

### About CyrusOne

CyrusOne is a leading global data centre developer and operator, headquartered in the USA, specialising in delivering state-of-the-art digital infrastructure solutions across the globe. With more than 55 high-performance mission-critical facilities worldwide, the Company ensures the continued operation of digital infrastructure for nearly 1,000 customers, including approximately 200 Fortune 1000 companies. In short, we develop data centres and then lease them to large technology companies with large data requirements.

CyrusOne has had a presence in Ireland since 2018 with our first data centre going live in 2021, developed for a large global tech company that is a major employer in Ireland. Our operational data centre is located at Conchobar Murray Avenue, Grange Castle Business Park South, Co. Dublin, Republic of Ireland.

Regards,



Eric Hoegger  
Sr. Director, Global Power and Energy