



An Coimisiún
um Rialáil Fóntais
**Commission for
Regulation of Utilities**

An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities

Transmission Network Charges for Energy Storage

Minded-to Interim Decision

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CRU Strategic Plan 2025-27

Vision, Purpose, and Values



OUR VISION:

Resilient, efficient, sustainable, and safe energy and water services for Ireland.



OUR PURPOSE:

We actively serve the public interest by regulating the provision of energy and water to Irish homes and businesses, while supporting the transformation to net zero.



OUR VALUES:

• Integrity • Professionalism • Openness • Accountability

Executive Summary

The CRU is seeking feedback on its minded-to position to issue a new interim decision to supersede the CRU/20/115 Network Charges for Commercial Storage Units Interim Solution issued in 2020. This Minded-to Interim Decision relates to the transmission use of system charges (“TUoS”) paid by Energy Storage Units (“ESUs”), either standalone units or co-located with other generation units. It does not apply to storage co-located with demand and does not affect existing charging arrangements for Autoproducer Users.¹

Battery Energy Storage Systems (“BESS”) have operated under an interim arrangement for transmission network charging since 2020.² The arrangement introduced by the CRU’s 2020 Interim Decision was put in place given the view that the charging arrangements at the time, levying both demand TUoS (“D-TUoS”) and generation TUoS (“G-TUoS”), may not have accurately reflected the costs imposed on the network by BESS and posed a potential barrier to entry.

The Interim Decision specified that BESS would pay D-TUoS only i.e., on the basis of their withdrawals from the grid and Maximum Import Capacity (“MIC”). At the time, the CRU recognised that a full review of the network tariff structure would be required to develop an enduring charging regime for storage and intended that it would take place within the wider Electricity Network Tariff Structure Review (the ENTSR) which commenced in 2020.

However, since the Interim Decision, both the level of investment in ESUs and their role on the system have changed substantially. ESUs, which typically provided system support, are now able to participate in the wholesale market providing flexibility by storing energy during times of high availability for export into the system during low availability. In addition, the ENTSR was postponed in 2022, given the necessity to divert CRU resources to manage the impact on energy markets arising from the Russian invasion of Ukraine.

Given these circumstances, the CRU is minded-to implement a revised interim decision specifying that ESUs should pay G-TUoS and not D-TUoS, consistent with other generation units. For clarity, the CRU is not seeking to modify charging arrangements for Distribution Use of Service (D”UoS”) charges.

¹ The CRU will seek to conduct more comprehensive assessment and identify more enduring solutions for charging arrangements for electricity network use of system tariffs within the scope of the Electricity Network Tariff Structure Review (the ENTSR).

² Whereas the CRU’s 2020 Interim Decision applied only to BESS, the CRU is minded-to broaden the revised Interim Decision to apply to ESUs as described above.

The CRU's position is that charging ESUs on the basis of G-TUoS would avoid distortions arising from volumetric charging on ESUs, promote a level-playing field between ESUs across the Single Electricity Market ("the SEM") and between ESUs and other generation technologies providing the same services, and provide locational signals for siting of ESUs. The CRU recognises that this proposed change has the potential to increase charges for the remainder of D-TUoS customers as set out in the impact statement below. However, given the importance of ESUs in delivering the future energy system, the CRU expects the approach set out in this Minded-to Interim Decision for consultation to result in overall net benefits for customers.

Given these reasons, **the CRU is minded-to implement a revised interim decision reflecting the matters set out in this paper for the 2026/27 tariff year** (i.e., from October 1st, 2026). The proposed change aims to deliver charging arrangements on an interim basis which is more aligned with the operational nature of ESUs, including their role in providing balancing and congestion relief.

The CRU will seek to conduct more comprehensive assessment and identify enduring solutions for charging arrangements for network use of system tariffs within the scope of the ENT SR. However, the CRU recognises that the ENT SR will take time to complete, and considers that the reasons set out above require action to revise the existing Interim Decision prior to the conclusion of the wider, multi-annual review in order to promote efficiency, the use of indigenous renewable, sustainable or alternative forms of energy, and to protect the interests of final electricity customers.

The CRU is seeking feedback on the minded-to interim decision as set out in this paper.

Public/Customer Impact Statement

The CRU expects its minded-to decision to result in the following overall net benefits for customers:

- relatively lower electricity prices due to the potential for ESUs to store electricity when supply is abundant and releasing it during times of high demand, as well as associated reductions in balancing costs, curtailment and redispatch;
- increased integration of indigenous renewable energy, along with associated emissions reductions;
- enhanced incentives to locate storage in ways that reduce the need for network reinforcements, *and*
- increased investment in energy storage to provide system services.

However, the CRU's notes that applying G-TUoS rather than D-TUoS to ESUs will, all else being equal, result in an increase in D-TUoS charges for other demand paying customers of circa 2%. Given TUoS constitutes approximately 8% of the standard domestic electricity bill,³ the CRU estimates that the average impact of the CRU's proposal is approximately 0.2% increase in the standard domestic electricity bill.⁴ The CRU considers that the benefits listed above will likely outweigh the marginal increase in D-TUoS charges.

The CRU also recognises the minded-to position will have a distributional impact on customers paying G-TUoS. The inclusion of ESUs in the G-TUoS charging base will impact the amount paid by different G-TUoS customers. However, unlike D-TUoS, the total average paid by customers will not exceed the current amount which is already at the cap of €2.5/MWh set by EU Directive 838/2010.⁵

³ The CRU (18 October 2021), CRU's Electricity Network Tariff Structure Review: Objectives, Principles & Call for Evidence, CRU/21/123.

⁴ The estimated impact on the standard domestic electricity bill assumes that the average domestic customer has the same demand profile and MIC as the average D-TUoS billpayer. In reality, the estimated impact on the standard domestic electricity may be slightly higher or slightly lower, depending on whether the demand profile of an average domestic customer leads to the customer generally paying more or less TUoS on average.

⁵ Commission Regulation (EU) No 838/2010 of 23 September 2010 on laying down guidelines relating to the inter-transmission system operator compensation mechanism and a common regulatory approach to transmission charging, Annex Part B.

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
ACER	European Union Agency for the Cooperation of Energy Regulators
Act	Electricity Regulation Act, 1999
AIE Regulations	The European Communities (Access to Information on the Environment) Regulations 2007 to 2014
AIRAA	All-Island Resource Adequacy Assessment
Autoproducer User	<p>A User who supplies a natural or legal person who consumes and generates electricity in a Single Premises or, on whose behalf another person generates electricity in the Single Premises where such generation is essentially used in that Single Premises</p> <p>Or</p> <p>Supplies a natural or legal person who consumes and generates electricity in a Single Premises, or on whose behalf another person generates electricity in the Single Premises whereby the generated electricity is produced through a Combined Heat and Power process under a licence by CRU</p>
BESS	Battery Energy Storage Systems
CEP	Clean Energy Package
CRU	Commission for Regulation of Utilities
D-TUoS	Demand Transmission Use of System
ECA	Economic Consulting Associates

EirGrid	The holder of the Transmission System Operator licence granted to it by the CRU under section 14(1) (e) of the Act
ENTSR	Electricity Network Tariff Structure Review
ESBN	ESB Networks
ESI	Energy Storage Ireland
ESU	Energy Storage Unit as defined in the Grid Code
EU	European Union
FOI Act	Freedom of Information Act 2014
G-TUoS	Generation Transmission Use of System
kW	Kilowatt
MEC	Maximum Export Capacity
MIC	Maximum Import Capacity
MW	Megawatt
MWh	Megawatt-hour
NEDS	National Energy Demand Strategy
Network Charges	For the use of the transmission system infrastructure for the transportation of electricity
PN	Physical Notification
Postage Stamp Component	A portion of G-TUoS that is intended to recover a minimum of 70% of the total G-TUoS revenue and is applied evenly across all generators
Regulatory Authorities (RAs)	The Utility Regulator (UR) in Northern Ireland and the Commission for Regulation of Utilities (CRU) in Ireland and the term “Regulatory Authority” shall be construed accordingly to mean any one of them as the context admits or requires
RES	Renewable Energy Source
SDP 2	Initiative 2 of the Scheduling and Dispatch Programme

SEAI	Sustainable Energy Authority of Ireland
SEM	The Single Electricity Market, which is the wholesale all island single electricity market
SEMC	Single Electricity Market Committee
SEMO	Single Electricity Market Operator
SONI	The System Operator in Northern Ireland and the holder of the Licence to Participate in the Transmission of Electricity granted by the UR under the Electricity (Northern Ireland) Order 1992
System Services Charge	For the recovery of the costs arising from the operation and security of the transmission system
TAO	Transmission Asset Owner
TNUoS charges	Transmission Network Use of System charges that recover the cost of installing and maintaining the transmission system in England, Wales, Scotland, and offshore
Triad	The half-hour settlement period of highest demand on the Great Britain's electricity transmission system between November and February (inclusive) each year
TSO	Transmission System Operator
TUoS	Transmission Use of System
UR	Utility Regulatory in Northern Ireland

1. Introduction

This paper is for the attention of all members of the public and the energy industry. It will be of particular interest to the ESU industry, customers paying transmission network charges, and network companies.

1.1. Background

EirGrid's Grid Code defines ESUs as "*Generation Units using storage devices to generate and consume electricity as, or as part of, a PPM*" (Power Park Module).⁶ Prior to 2020, ESU capacity in Ireland totalled approximately 19.5 MW.⁷ ESUs connected to the transmission network paid Transmission System Use of System charges ("TUoS") on both energy withdrawals (Demand TUoS, or "D-TUoS") and injections (Generation TUoS, or "G-TUoS") given the potential to impose costs to the transmission network from both activities.⁸

Battery Energy Storage Systems (BESS) have operated under an interim arrangement for transmission network charging since 2020. The CRU introduced an Interim Decision in 2020 with the view that existing charging arrangements at the time, levying both demand TUoS (D-TUoS) and generation TUoS (G-TUoS), may not have accurately reflected the costs imposed on the network by BESS and posed a potential barrier to entry.

However, since the 2020 Interim Decision, both the anticipated investment in ESUs and their role on the system have changed substantially, enabled by new policy and market design changes such as Initiative 2 of the Scheduling and Dispatch Programme ("SDP 2").⁹ These changes increase the scope of potential system benefits delivered by ESUs through participation in wholesale markets. In addition, the ENTSR was postponed in 2022, with CRU resourcing diverted to manage the impact on energy markets arising from the Russian invasion of Ukraine.

Given these changes, and calls from industry to charge ESUs on the basis of G-TUoS in alignment with arrangements in Northern Ireland, the CRU is reconsidering the Interim Decision on the transmission network charges to be paid by ESUs. The CRU intends to apply the updated Interim Decision to all ESUs which are standalone units or co-located with generation, to ensure

⁶ EirGrid (17 October 2025), EirGrid Grid Code Version 16, p. 417.

⁷ SEAI (December 2025), Energy in Ireland 2025 Report, p.70.

⁸ The CRU (June 2020), Network Charges for Commercial Storage Units Interim Solution Consultation Paper, CRU/20/066, p.1. See also SEAI (December 2025), Energy in Ireland 2025 Report, Table 4.10.

⁹ EirGrid, SEMO & SONI (November 2025), Overview of SDP Solution for Battery Units Version 2.0.

consistency with other generation units. The CRU's minded-to Interim Decision does not apply to storage co-located with demand and does not affect existing charging arrangements for Autoproducer Users..¹⁰

1.2. Related Documents

- Network Charges for Commercial Storage Units Interim Solution (CRU/20/115)

1.3. Legal and Policy Background

The CRU's remit regarding electricity network use of system charges is primarily set out in Sections 35 and 36 of the Electricity Regulation Act, 1999 (the Act). Here, the CRU may give directions to the regulated electricity network companies from time to time regarding the basis for use of system charges and approves statements of charges received further to such directions.

More generally, the CRU's functions and duties are set out principally in Section 9 of the Act. Here, the CRU shall carry out its statutory functions in a manner which does not discriminate unfairly between relevant stakeholders and with regard to a range of factors which are relevant to the matters under consideration here. For example, the CRU must have regard, *inter alia*, to:¹¹

- the need to protect the interests of final customers and to secure that all their reasonable demands for electricity are satisfied;
- the need to promote the continuity, security and quality of supplies of electricity;
- the need to promote competition;
- the need to promote efficiency and the use of renewable, sustainable or alternative forms of energy;
- the benefits of developing demand-side participation in electricity markets, including through energy efficiency, demand-response, distributed generation, energy storage and the use of digital technologies; and
- the use of energy storage technologies in participating in the balancing of electricity demand and supply.

¹⁰ The CRU notes that Turlough Hill already pays transmission network charges on the basis of G-TUoS. See also: EirGrid and SONI (29 August 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS).

¹¹ Electricity Regulation Act 1999 , Section 9: Functions of Commission.

Section 9 also states that, without prejudice to the duties of the Minister and the CRU not to discriminate as above, nothing in the Act shall unduly hamper ‘...investments into, in particular, variable and flexible energy generation, energy storage and the deployment of electromobility and new interconnectors between Member States’.¹²

Other governing legislation is also relevant, including the Climate Action and Low Carbon Development Act, 2015 and applicable EU legislation. Regarding the latter, most relevant are:

- Article 59 of **EU Directive 2019/944** states that each regulatory authority has the duty to fix or approve, in accordance with transparent criteria, transmission or distribution tariffs or their methodologies, or both;¹³
- Matters prescribed in Article 18 of **EU Regulation 2019/943** (as set out in Annex A);¹⁴ and
- Requirements set out in **EU Regulation 838/2010** regarding inter TSO compensation and a common regulatory approach to transmission charging.¹⁵

Article 18 of EU Regulation 2019/943 is of particular note as it sets out requirements in relation to network charges, both connection and use of system, including, for example, that they shall be cost-reflective, transparent, take into account the need for network security and flexibility, shall be applied in a non-discriminatory manner and shall not include unrelated costs supporting unrelated policy objectives. It also states that they shall not discriminate either positively or negatively against energy storage or aggregation and shall not create disincentives for self-generation, self-consumption or for participation in demand response.

This minded-to decision is published in the context of the Government’s 2024 Electricity Storage Policy Framework as referenced in the ‘accelerate flexibility’ theme within the Climate Action Plan of the same year.^{16 17}

1.4. Structure of Paper

The structure of the remainder of this paper is as follows:

¹² Electricity Regulation Act 1999 (revised up to 31 December 2025), Section 9: Functions of Commission, para. 4 (ab) (iii).

¹³ EU Directive 2019/944, Article 59, para. 1 (a).

¹⁴ EU Regulation 2019/943, Article 18.

¹⁵ EU Regulation 838/2010.

¹⁶ Department of Climate, Energy and the Environment (2024) Climate Action Plan 2024. EL Electricity, pp 33 and 34.

¹⁷ Department of Climate, Energy and the Environment (2024) Electricity Storage Policy Framework. 1.3.2 Electricity Storage Technology and 1.3.6. Definition

- **Section 2** describes existing transmission charges in Ireland, and how these have historically applied for ESUs. It covers the CRU's 2020 Interim Decision which sought to align with European precedent in network charging arrangements for ESUs;
- **Section 3** describes how the role for ESUs has changed in the Irish market since the 2020 Interim Decision, and outlines potential benefits and risks that the CRU has identified in re-evaluating its previous position;
- **Section 4** outlines the CRU's minded-to decision, which is to charge ESUs G-TUoS instead of D-TUoS, and describes implementation arrangements; and
- **Section 5** outlines how stakeholders can respond to this consultation.

2. Evolution of Transmission Network Charges and Payment by ESUs

This Section provides factual background regarding transmission charging structures and rules for the relevant charges paid by ESUs to date.

2.1. Summary of Transmission Use of System Charges in Ireland

In Ireland, ESUs pay transmission charges on the basis of D-TUoS levied on their energy withdrawals and MIC.¹⁸ This is in contrast with ESUs in Northern Ireland, which pay G-TUoS on the basis of energy injections and MEC. This Section provides an overview of the current demand (D-TUoS) and generation (G-TUoS) charging framework in Ireland which has applied since the tariff year 2022/23.¹⁹

TUoS charges recover (i) the costs of using the transmission system infrastructure to transport electricity (“Network Charges”), as well as (ii) the costs arising from the operation and security of the transmission system (“System Services Charges”). Costs to be recovered (as determined through allowed revenues of network companies) are allocated between D-TUoS and G-TUoS.

Approximately 75% of transmission network costs and full system service costs are recovered through D-TUoS.²⁰ **D-TUoS charges** are formed of three components with both capacity and volumetric charging:²¹

- **Demand Network Capacity Charge** typically levied per MW of Maximum Import Capacity (MIC);²²

¹⁸ With the exception of Turlough Hill, which pays G-TUoS.

¹⁹ The CRU made a decision on the peak and off-peak TUoS tariff in 2022 which EirGrid has followed since. See The CRU (28 September 2022), CRU202291, Electricity Network Tariffs 2022/23: National Energy Security Framework Response, p.5.

²⁰ EirGrid (15 September 2025), EirGrid Statement of Charges 2025/2026 v1.0 where System Services Charges are only allocated to demand users, recoverable through D-TUoS. See also Utility Regulator (19 August 2020), G-TUoS Revenue Allocation Consultation, p.4, para 1.5, and SEM-11-078, pp.26-27.

²¹ EirGrid (15 September 2025), EirGrid Statement of Charges 2025/2026 v1.0: Tariff Schedule DTS-T, p.7.

²² EirGrid can also calculate the Demand Network Capacity Charge based on a customer’s Minimum Charging Capacity, or the highest metered consumption demand within the charging period. See: EirGrid (15 September 2025), EirGrid Statement of Charges 2025/2026 v1.0: Tariff Schedule DTS-T, p.7.

- **Demand Network Transfer Charge** levied per MWh of energy consumption within the charging period. Together with the Demand Network Capacity Charge, these two Network Charges recover the costs of using transmission system infrastructure to import electricity from the system; and
- **Demand System Services Charge** levied per MWh of energy consumption with time-of-use variation between peak (17:00 to 19:00) and off-peak hours. The System Services Charge recovers the costs arising from the operation and security of the transmission system.

The remaining share of transmission network costs are recovered through G-TUoS levied on generators in Ireland, and generators and ESUs in Northern Ireland.²³ **G-TUoS charges** are formed of three components, and largely recover costs using capacity-based charges:²⁴

- **Generation Network Location-based Capacity Charge** levied per kW of the unit's MEC and includes two sub-components:²⁵
 - A "**Postage Stamp Component**" which is fixed per kW for the charging year irrespective of the unit's location in the network; and
- A "**Locational Component**" which varies per kW depending on the location of the unit's connection to the transmission network, as introduced above. EirGrid sets the Locational Component to reflect how the costs of providing transmission vary across the network such that it "*tends to be higher in regions which are remote from large demand centres, and in parts of the network which have a large number of developments built or planned*".²⁶
- **Generation System Services Charges**, levied to recover costs associated with operational performance failures by the generator (such as power trips, short-notice changes in output, failure to meet reactive power or reserve requirements).

²³ The All-Island G-TUoS pot comprises 25% of the transmission network costs from Ireland, 25 % of the Northern Ireland Electricity Networks TUoS requirement, and 15% of SONI's revenue related to internal costs. See The Utility Regulator (27 April 2021), G-TUoS Revenue Allocation Decision Paper, para 4.3 and 4.4.

²⁴ EirGrid (15 September 2025), EirGrid Statement of Charges 2025/2026 v1.0: Tariff Schedule DTS-T, p.7.

²⁵ EirGrid (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS): Accompanying Note, pp.6-9.

²⁶ EirGrid (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS): Accompanying Note, p.7.

While D-TUoS charges are set by EirGrid for Ireland, G-TUoS charges are governed by the Single Electricity Market Committee (“the SEMC”) and are set on a SEM wide basis by the relevant Transmission System Operators (“the TSOs”).²⁷

2.2. Pre-2020 Network Charges for BESS Units in Ireland

Prior to 2020, there was only a small amount of BESS capacity connected to the SEM. In 2020, BESS storage capacity in Ireland was 15 MWh, only 1.6% of the 943 MWh in BESS volume connected four years later in 2024.²⁸

The predominant role of BESS units has been to provide system services. System processes and regulations in the SEM largely precluded BESS units from participating in energy trading to provide flexibility in wholesale energy markets (i.e., by importing intermittent generation at times of high availability for future export during times of low availability):

- BESS units were registered and modelled as “multi-fuel generator” units that did not reflect battery-specific technical capabilities such as charging capability, meaning TSOs could not track battery charge levels; and
- BESS units could not submit negative Physical Notifications (“PNs”) to notify TSOs of their intention to charge in a market period, meaning they had to adhere to pre-approved charging schedules that limited their ability to respond to price signals.

BESS paid both D-TUoS on energy withdrawals and G-TUoS for energy injections, as well as paying Network Capacity Charges on both their MIC and MEC through D-TUoS and G-TUoS charges.

2.3. Post-2020 Network Charging Arrangements for BESS Units in Ireland

²⁷ Unlike the CRU which publishes the allowed revenue for each calendar year, Utility Regulator (UR) in Northern Ireland publishes allowed revenue for each tariff year. See EirGrid & SONI (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS) Accompanying Note, p.5, see also UR (September 2025), Regulated Entitlement Values 2025-2026 Tariff Year, para 2.7.

²⁸ SEAI (December 2025), Energy in Ireland 2025 Report, p.71.

In 2020 the CRU consulted on an Interim Decision for BESS TUoS charges which sought to better align with new European regulations and remove market entry barriers.²⁹ For example, the EU's 2019 Clean Energy Package ("the CEP") explicitly requires Member States to ensure that BESS units are "*not subject to any double charging, including network charges*" for stored energy.³⁰

In its 2020 Interim Decision, the CRU considered three alternative charging arrangements to adopt for BESS units:³¹

- Apply **D-TUoS charges only** to BESS units.
- Apply **G-TUoS charges only** to BESS units.
- Apply charges similar to **Autoproducers**, at the higher of either D-TUoS or G-TUoS charges.

The CRU decided that, on an interim basis, BESS units should pay transmission network charges on the basis of D-TUoS only. The reasons for the CRU's Interim Decision were largely based on an assessment that "*incentivising a storage provider to have a higher MEC and a lower MIC, facilitates more efficient operation of the system*" because:³²

- G-TUoS charges are based in part on a unit's MEC. Charging based on G-TUoS therefore creates potential incentives for BESS to understate their MEC, reducing their capability to provide system services when called upon.³³ Charging based on D-TUoS sought to "*remove a potential impediment to enabling higher MECs for storage providers*" increasing their "*capability to provide more system support when called upon by the TSO*";
- Applying D-TUoS charges, which are based in-part on MIC, potentially creates a similar incentive for BESS to understate import capacity thereby limiting the flexibility BESS can provide (which require import capacity to import energy when availability is high). However, the CRU did not view this as an issue at the time, since BESS could "*simply import at a lower rate over a longer period of time*"; and

²⁹ The CRU (29 September 2020), CRU/20/115 Network Charges for Commercial Storage Units Interim Solution: Introduction, pp. 1-2.

³⁰ EU Directive 2019/944, Article 15 (5) (b).

³¹ The CRU (29 September 2020), CRU/20/115 Network Charges for Commercial Storage Units Interim Solution: Proposed Interim Solution, pp. 2-3.

³² The CRU (29 September 2020), CRU/20/115 Network Charges for Commercial Storage Units Interim Solution: Proposed Interim Solution, pp. 2-3.

³³ Section 3.6 below discusses this point further.

- In any case, the CRU considered that a higher MIC would “*allow storage providers to import large amounts of energy over a short period of time which can increase the complexity of system operation*”.³⁴

The CRU made these considerations in the context of the expectation that BESS would largely play a role in the provision of system services, whereas now the expectation is that ESUs will also play an important role in energy arbitrage.

Since the 2020 Interim Decision, BESS units have paid transmission network charges only on the basis of D-TUoS in Ireland.

The CRU intended that the Interim Decision would be a temporary one and subject to review under the ENTSR, which was commenced in 2020. However, the ENTSR was postponed, with the CRU diverting resources to manage the impact on energy markets arising from the Russian invasion of Ukraine.

2.4. Network Charging Arrangements for BESS Units in Other European Countries

Transmission network charging approaches for BESS vary across European jurisdictions. In general, countries have sought to avoid charging BESS for withdrawals and injections, by applying only one of either demand or generator transmission charges for BESS. Many countries exempt BESS from transmission charges altogether, sometimes as part of interim arrangements to allow for time to analyse potential enduring solutions.

In some jurisdictions, BESS units have paid generation transmission network charges which are generally lower than demand network charges. BESS units located in **Northern Ireland** pay G-TUoS rather than D-TUoS charges.³⁵ In **Great Britain**, BESS pay zonal and capacity-based generation Transmission Network Use of System (“TNUoS”) charges.³⁶ BESS units are only liable for demand TNUoS charges if they import energy from the system during peak times (the “Triad” period).

³⁴ The CRU (24 June 2020), CRU/20/115, Network Charges for Commercial Storage Units Interim Solution Decision Paper, p.4.

³⁵ SONI TUoS Statement of Charge, Applicable from 1st October 2025, pp. 14-17.

³⁶ NESO The Statement of Use of System Charges, Issue 7.1, Effective from 1 April 2025, pp. 7-11.

In some European jurisdictions, BESS units are exempt from transmission charges altogether, sometimes as interim arrangements ahead of an enduring solution. For example, In **Italy**³⁷, **Lithuania**³⁸, **Spain**³⁹, and **Portugal**, BESS units are eligible for revenue via wholesale and system services markets, but are exempt from transmission use of system charges.⁴⁰ **Belgium** and **Germany** have previously applied derogations from transmission network charging.⁴¹ In **Poland** and **Slovakia**, BESS are not exempt from transmission charges, but do receive favourable terms compared to other transmission-connected demand and generation units.⁴² In **France**, from August 2026 BESS will be able to opt in to a locational tariff component that rewards charging/discharging in line with system needs.⁴³

In summary, the approach to transmission network charging for BESS remains varied across European jurisdictions. As set out above, many jurisdictions have introduced either interim arrangements and/or derogations on network charges for storage in order to promote investment while a more enduring decision is analysed.

The ACER Report on Electricity Network Tariff Methodologies in Europe offers a set of recommendations to ensure non-discrimination by network users, including accounting for both injections and withdrawals, as well as ensuring cost-reflectivity and efficient price signals by moving away from flat energy-based charges and considering locational signals when needed.⁴⁴

The CRU's re-evaluation of its Interim Decision seeks to follow a similar approach, ensuring the approach taken to network charging does not result in an undue barrier to investment, while allowing for more time to carry out comprehensive assessment for a more enduring solution.

³⁷ In Italy, the TSO Terna provides capacity payments to BESS, which can also earn revenue for system services and through participation in ex ante energy markets.

³⁸ In Lithuania, BESS imports and withdraws electricity directly from the energy grid, including to provide system services.

³⁹ In Spain and Portugal (collectively, the Iberian Grid), BESS units are eligible for participation in both ancillary services and wholesale energy markets. Spain has also approved plans to procure generation (including BESS) through a capacity market.

⁴⁰ ACER (26 March 2025), Electricity network tariffs methodologies in Europe: Annex 1, Table 30.

⁴¹ In Germany, BNetzA is considering implementing new network charges for BESS with capacity and volumetric (on net imports only) payments, which would adjust dynamically to better align charging/discharging time and location with system requirements. See: BNetzA (4 March 2026), Dynamic network tariff component: points of orientation in the AgNes determination proceedings.

⁴² ACER (26 March 2025), Electricity network tariffs methodologies in Europe: Annex 1, Table 30.

⁴³ CRE (13 March 2025), CRE Decision No. 2025-77.

⁴⁴ ACER (26 March 2025), Electricity network tariffs methodologies in Europe, p.18.

3. Re-evaluating Transmission Network Charges for ESUs

The CRU is re-evaluating its 2020 Interim Decision regarding transmission network charges for ESUs. In its re-evaluation, the CRU has considered a request from the ESI and other industry participants to G-TUoS instead of D-TUoS charges for ESUs:

- In a letter to the CRU in September 2025, ESI advocated for the CRU to direct TSOs to apply G-TUoS instead of D-TUoS tariffs for ESUs.⁴⁵ ESI argued that in Northern Ireland, storage units only pay the G-TUoS charges, which “*creates an uneven playing field and disadvantages storage units in RoI*”.⁴⁶ ESI also cited evidence from a study that it commissioned from ECA, which estimated benefits of removing D-TUoS charges, including a 30% increase in storage utilisation resulting in a net saving to customers of €37 million per annum (including reduced constraint costs, wholesale energy costs, and carbon costs);⁴⁷ and
- Statkraft supported ESI in an October 2025 letter to the CRU which also advocated a move to G-TUoS in place of the current D-TUoS charges. Statkraft highlighted that D-TUoS charges create a “*significant barrier to investment and operation*” of storage assets, and that G-TUoS charges “*better reflect the role and contribution of storage to the electricity system*”.⁴⁸

This Section sets out the key reasons and considerations that lead to the CRU’s minded-to position.

3.1. The Evolving Role of ESUs in the Irish Market

Since 2020, the size of the ESU market in Ireland has grown to meet flexibility requirements in a grid that is becoming increasingly reliant on variable generation. The uptake of additional, longer-duration storage capacity increased the role for storage units in providing system support. In the 2024 National Energy Demand Strategy (NEDS), the CRU set out a target of delivering 20% to

⁴⁵ ESI (23 September 2025), Network Charges for Energy Storage (via Email).

⁴⁶ ESI (23 September 2025), Network Charges for Energy Storage (via Email), p.3.

⁴⁷ ECA (21 March 2025), Network charges for energy storage, last accessed 31 March 2026, link: https://www.energystorageireland.com/wp-content/uploads/2025/03/1070_Network-charges-for-energy-storage_210325.pdf.

⁴⁸ Statkraft (21 October 2025), Network Charges for Energy Storage (via Email).

30% of demand-side flexibility by 2030 and expects that ESUs will be one of the biggest providers of that flexibility within that timeframe.⁴⁹

ESUs are already contributing additional flexibility and support services across the SEM compared to 2020. Changes to system processes and regulations, particularly via SDP 2, have increased ESUs' ability to provide energy flexibility by participating in ex ante energy markets:⁵⁰

- registering BESS units as generators with a “Battery Storage” fuel type which allows for additional “battery-specific” characteristics (such as a minimum and maximum storage quantity);
- allowing BESS units to submit negative PNs (for charging) as well as positive PNs (for discharging) to notify TSOs of their intended output for each trading period, *and*
- enabling TSOs to schedule BESS units in indicative operating schedules.

The CRU considers that continued investment in ESU capacity is necessary to help facilitate the meeting of the Government's 80% Renewable Energy Source (RES) target by 2030.

Consideration of the appropriate degree of alignment between price signals for storage investment and dispatch with system needs arises in this context. It is therefore essential that price signals for storage investment and dispatch align with system needs.

Given the changes highlighted above, the CRU considers that the 2020 Interim Decision may no longer be appropriate in the context of the role of storage in the market today.

3.2. Distortions Arising from Volumetric Charging

SDP 2 introduced new system processes and regulations to increase ESUs' ability to participate in wholesale energy markets. Price signals in wholesale markets incentivise ESUs to provide system flexibility by purchasing low-cost energy during times of high availability and exporting during times of low availability. ESUs earn arbitrage revenue on price differences in wholesale markets and simultaneously provide system benefits such as lower curtailment and reduced reliance on carbon intensive thermal generators.

Unlike G-TUoS charges, D-TUoS charges contain volumetric costs on each MWh of energy withdrawn from the grid. Demand Network Transfer Charges and System Services Charges

⁴⁹ The CRU (25 July 2024), CRU202467, National Energy Demand Strategy Decision Paper Decision Paper, p.3 & 31.

⁵⁰ SEM-O (20 December 2024), Scheduling and Dispatch Programme: Overview of SDP Solution for Battery Units.

collectively impose an additional charge per MWh cost on imports for ESUs (between €30.56 – €33.21 for the 2025/2026 charging period, depending on time of use).⁵¹

Charging ESUs on a volumetric basis translates into a minimum price differential in the wholesale electricity market required for ESUs to earn arbitrage revenue while generating system benefits by shifting generation from times of low to high marginal cost. That is not necessarily a problem if the volumetric charges reflect the costs that energy consumption from the network tends to impose. But that is considered unlikely to be true for D-TUoS volumetric charges given that they recover c. 75% of total D-TUoS revenue, and the majority of transmission network costs is typically thought to be driven by accommodating peak demand.⁵² The CRU will investigate this further under the ENTSR.

Therefore, D-TUoS volumetric charges can create a distortion for ESUs that reduces their ability to respond to market price signals and deliver system benefits.

Applying G-TUoS instead of D-TUoS removes these additional costs for ESUs to provide flexibility by importing and exporting energy in wholesale markets.

The CRU notes that it is necessary to consider cost-reflectivity of network use of system charges generally, including for ESUs, and will consider this issue as part of the wider, multi-annual ENTSR.

3.3. A Level Playing Field for ESUs Across the SEM

Ireland and Northern Ireland share a single electricity market with a common energy market price. Demand and generation units (including ESUs) connected to the SEM can freely transfer energy across the network (subject to transmission constraints) and participate in the same system service markets.

The basis for the application of network use of system charges for ESUs vary across the two jurisdictions. ESUs in Northern Ireland pay G-TUoS only, while ESUs in Ireland pay D-TUoS,⁵³ creating two distortions in signals within the market:

⁵¹ EirGrid (15 September 2025), EirGrid Statement of Charges 2025/2026 v1.0: Tariff Schedule DTS-T, p.7.

⁵² ACER (26 March 2025), Electricity network tariffs methodologies in Europe, p. 8.

⁵³ Unlike other ESUs, Turlough Hill, the sole pumped hydro unit in Ireland, already pays G-TUoS. Source: EirGrid and SONI (29 August 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS).

- In **charge level**, since the value of D-TUoS charges in both jurisdictions are typically higher than G-TUoS charges; and
- In **charge type**, which creates different signals within the same market by, for instance, imposing a volumetric charge on electricity imports in Ireland only.

Applying G-TUoS rather than D-TUoS in Ireland seeks to mitigate these two distortions by more closely aligning the basis for the application of network charges for ESUs between the two jurisdictions, creating a more level playing field for future investment. This aligns with the original purpose of the locational component of G-TUoS which was “*to introduce harmonised all-island Generator TUoS tariffs to provide participants in the SEM with a competitive level playing field*”.⁵⁴

3.4. A Level Playing Field Between ESUs and Other Generation Technologies

As set out in Section **Error! Reference source not found.** above, charging D-TUoS to ESUs in Ireland creates an unlevel playing field between ESUs across the SEM, and distorts decisions to invest in ESUs across different locations in the same market.

For similar reasons, charging ESUs on the basis of D-TUoS also creates an unlevel playing field relative to other forms of generation in the SEM to provide similar services to the market. While generation pays G-TUoS, storage pays D-TUoS which is both generally higher as a level of a charge and levied on different usage behaviours (e.g., a volumetric component). Irrespective of the cost reflectivity of either of the charges, the difference in charging basis creates distortions in the competition between ESUs and generation to provide the same services to the market (e.g., wholesale energy and system services).

Applying G-TUoS rather than D-TUoS charges to ESUs seeks to mitigate this distortion by more closely aligning networks charges for ESUs and other generation technologies, creating a more level playing field for future investment.

⁵⁴ EirGrid & SONI (11 April 2011), SME-11-018, Locational Signals Project: All-Island Generator TUoS, p.3.

3.5. Locational Signals and the Siting of ESUs

Prospective investors currently face limited locational signals to incentivise optimal siting of future storage assets:

- D-TUoS tariffs do not vary according to a unit's location in the network;
- Connection charges for generators (which ESUs are liable to pay) are typically “shallow”, meaning they are liable for the direct cost of connecting to the nearest node, but not for additional transmission reinforcement deeper into the network;⁵⁵ and
- There is a “single price” for energy in the SEM with no variation to reflect regional market dynamics.

Unlike D-TUoS, G-TUoS charges do contain a Locational Component which varies according to the location of a unit's connection to the network (for 2025/2026, the Locational Component was between €3.24 and €11.77 per kW).⁵⁶ EirGrid sets the Locational Component using the regulatory approved G-TUoS methodology which “*has been designed to link system usage with the transmission investment costs for different parts of the network*” meaning “*each Generator's TUoS charge should then be reflective of transmission investment costs linked to its own use of the system*”.⁵⁷

The price signals provided by variation in G-TUoS charges across locations of the network are designed to incentivise more efficient siting decisions by generators and ESUs, by reflecting the network costs associated with accommodating injections at those network locations. Generally, for generation sources, locations that are more remote from major demand centres, or where there is already significant generation development tend to face higher charges to reflect that they tend to drive greater network costs to enable the flow of their in-merit energy to meet demand.

Therefore, lower network charges closer to major demand centres may incentivise siting of ESUs in those locations and drive system cost savings. ESUs can reduce network reinforcement

⁵⁵ EirGrid & ESB Networks (June 2020), Joint TSO/DSO Group Processing Approach Charging and Rebating Principles, pp. 5-6. See also <https://www.eirgrid.ie/industry/customer-information/connection-charges-and-security>.

⁵⁶ EirGrid (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS): Accompanying Note, pp. 9.

⁵⁷ EirGrid (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS): Accompanying Note, p.6.

associated with serving demand in those locations by discharging at times of peak demand and providing additional adequacy.

On the other hand, locational signals provided by G-TUoS may not always be appropriate for ESUs relative to other generation types. ESUs located further away from demand centres but near other generation sources may face higher locational charges to reflect that conventional generation tends to increase network costs in such areas to enable the flow of energy to major demand centres. However, ESUs in those locations can help to reduce those network costs by absorbing surplus generation, reducing curtailment, and relieving network constraints.

The CRU is aware of the above matters which highlight the need to carry out comprehensive assessment to design a more enduring solution for network charging arrangements under the wider ENTSR. However, in the CRU's current view, moving to G-TUoS on an interim basis in advance of the wider ENTSR is more conceptually aligned with the role of ESUs than D-TUoS, which continues to classify ESU demand as if it were adding to system load rather than balancing and providing congestion relief.

3.6. Charging Incentives for ESUs under MIC and MEC

The changing roles of ESUs, and particularly BESS, also potentially impact the incentives provided by levying network tariffs on the basis of MIC under current arrangements compared to MEC under the CRU's minded-to position.

At the time of its Interim Decision, the CRU considered that ESUs would largely play a role in the provision of system services, whereas now the expectation is that ESUs will also play an important role in energy arbitrage.

Charging BESS on the basis of D-TUoS incentivised a lower MIC and did not provide incentives for BESS to reduce MEC. A BESS unit with higher MEC can provide more system support when called upon by the TSO (through MEC), whereas a low MIC could reduce the complexity of system operation to accommodate BESS withdrawals. At the time, the CRU considered that BESS could *"simply import at a lower rate over a longer period of time"*.

However, the role of ESUs and particularly of BESS in the Irish market has changed since the previous Interim Decision, driven by the SDP 2 and the expanding scope for ESUs to participate in the wholesale energy market. Now, the benefits of having higher MICs to respond to price signals faster increases. The CRU also notes that in order to reduce curtailment in short windows of high system availability and to support the NEDS, ESUs need to have higher MICs to import excess energy in a shorter period of time. As ESI states in June 2025:

*“The ability to fully charge and discharge becomes more commercially and operationally critical, making symmetric MIC and MEC not only standard, but essential...based on Energy Storage Ireland’s most recent pipeline survey, all member projects currently in development are seeking symmetric import and export capabilities (MIC = MEC)”.*⁵⁸

The CRU therefore recognises that the changing role of ESUs means its prior reasoning over the incentives provided to ESUs to reduce MIC may no longer be appropriate.

3.7. Implications for D-TUoS Customers

Given the importance of ESUs in enabling the future energy system, the CRU expects its minded-to decision to result in overall net benefits for customers. However, the CRU recognises that its minded-to position impacts the amount paid in transmission network charges by other D-TUoS customers and producers paying G-TUoS. The CRU sets out below a high-level estimate of this impact.

For the 2025/26 tariff year, the allowed revenues for EirGrid as the Transmission System Operator (TSO) and ESB Networks (ESBN) as the Transmission Asset Owner (TAO) for the electricity transmission network are c. €1,396m.⁵⁹ Of these allowed revenues, the TSO and TAO will recover c. €1,278m through D-TUoS charges (including system services charges).⁶⁰

The CRU’s proposal to apply G-TUoS instead of D-TUoS to ESUs will, all else being equal, increase D-TUoS charges for other demand paying customers. The CRU adopts a conservative approach to estimate the impact on D-TUoS customers by assuming that all the revenue currently paid by ESUs under D-TUoS is now recovered from the remaining D-TUoS customers. In reality, ESUs make some offsetting contribution to the revenue requirement through payments of G-TUoS up to the cap of €2.5/MWh set by EU Directive 838/2010, given they expand the total G-TUoS charging base.

⁵⁸ Energy Storage Ireland (18 June 2025), Response to All-Island Resource Adequacy Assessment 2026-2035 Methodology and Inputs & Assumptions Consultation, p.3.

⁵⁹ The CRU (26 August 2025), Electricity Transmission Network Allowed Revenues for 2026 And Demand Transmission Use of System (D-TUoS) Tariffs 2025/26 (CRU2025119), p. 1.

⁶⁰ The remainder of the allowed revenues (c. €118m) is recovered through G-TUoS. See: EirGrid and SONI (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS), Accompanying Note, p. 5.

The CRU estimates that ESUs currently contribute c. 2% of total D-TUoS payments in Ireland.⁶¹ The CRU estimates that charging ESUs G-TUoS instead of D-TUoS will mean remaining demand customers will need to contribute an additional c. €24.0m - €26.4m (or c. 2% in aggregate) through their D-TUoS payments.

TUoS constitutes approximately 8% of the standard domestic electricity bill.⁶² Therefore, the CRU estimates that the average impact of the CRU's proposal is a c. 0.2% increase in the standard domestic electricity bill (i.e., c. 2% increase in D-TUoS multiplied by c. 8% share of total electricity bill).⁶³

The CRU estimates the average impact on each component of D-TUoS as follows:⁶⁴

- Demand Network Capacity Charge: increase of c. 5.28%;
- Demand Network Transfer Charge: increase of c. 0.09% - 0.14%; and
- Demand System Services Charge: increase of c. 1.24% - 2.02%.

The CRU explains the estimation procedure in more detail in the Appendix.

While the CRU recognises the impact on D-TUoS customer bills, it considers that the wider system benefits of the decision will likely outweigh the estimated increase set out above. As described above:

- Electricity storage systems can help lower overall energy costs by storing electricity when supply is abundant and releasing it during times of higher demand, thereby easing pressure on the system during peak periods (see Section 3.2).
- ESUs can support more efficient locational and operational decisions by encouraging storage to connect and operate in areas where it provides the greatest value to the

⁶¹ The CRU (26 August 2025), Electricity Transmission Network Allowed Revenues for 2026 And Demand Transmission Use of System (D-TUoS) Tariffs 2025/26 (CRU2025119), p. 1.

⁶² The CRU (18 October 2021), CRU's Electricity Network Tariff Structure Review: Objectives, Principles & Call for Evidence, CRU/21/123.

⁶³ The estimated impact on the standard domestic electricity bill assumes that the average domestic customer has the same demand profile and MIC as the average D-TUoS billpayer. In reality, the estimated impact on the standard domestic electricity may be slightly higher or slightly lower, depending on whether the demand profile of an average domestic customer leads to the customer generally paying more or less TUoS on average.

⁶⁴ The CRU's estimates rely on assumptions on the charging profile of ESUs which are currently connected to EirGrid's transmission network. The CRU estimates total D-TUoS payments by these ESUs under the charges for the 2025/26 tariff year, i.e., the Demand Network Capacity Charge, the Demand Network Transfer Charge, and the Demand System Services Charge. The CRU assumes that the share of total D-TUoS payments recovered through each charge remains constant. The CRU explains its estimation procedure in more detail in the Appendix.

network, including where it can help alleviate constraints and reduce congestion (see Section 3.5).

- Greater investment in ESU capacity can strengthen system security and flexibility by providing fast-response services such as frequency support, reserve, balancing and other ancillary services (see Section 3.1). This can reduce reliance on more carbon-intensive or higher-cost conventional generation for system support purposes.

Over time, these benefits should contribute to a more efficient use of network infrastructure, improved integration of renewable generation and a more resilient electricity system overall. On that basis, while there may be a limited increase in certain customer charges in the short term, the CRU considers that the broader and longer-term benefits of energy storage deployment are likely to outweigh these impacts. The CRU therefore expects a net positive impact for electricity consumers if its minded-to interim decision is implemented.

The CRU also recognises its proposal will have a small, and mainly distributional impact on producers paying G-TUoS. The amount paid by different G-TUoS payers (net of any repayments over the cap of €2.5/MWh set by EU Directive 838/2010) will vary given that the charging base will vary with the inclusion of ESUs. Whether aggregate revenue from other producers (excluding ESUs) varies due to the CRU's proposed decision depends on whether ESUs contribute to G-TUoS at, or above, €2.5/MWh.

4. Minded-to Decision for Consultation

Considering the context and reasons above, **the CRU is minded-to implement a revised Interim Decision specifying that standalone ESUs, or those co-located with other forms of generation, should pay G-TUoS**, consistent with other generation units. For clarity, the revised Interim Decision will not apply to storage co-located with demand, does not affect existing charging arrangements for Autoproducer Users and does not seek to revise arrangements for Distribution Use of Service (DUoS) charges.

The CRU considers that there is a need to revise the current interim network charging arrangements for ESUs at this time given the matters set out earlier in this paper. The CRU considers that application to standalone ESUs or those co-located with generation but *not* to ESUs co-located with demand – including Autoproducer Users - is a pragmatic approach that should facilitate implementation in advance of the wider, multi-annual ENTSR. To seek to carry out a wider ranging review at this time would impact on timelines for decision making, implementation and for the potential benefits of the interim arrangement set out in this paper to accrue to electricity customers.

The CRU is minded-to apply network charges to ESUs on the same basis as for other generation units. The CRU will seek to conduct more comprehensive assessment and identify more enduring solutions for charging arrangements for network tariffs within the scope of the ENTSR. However, the CRU recognises that the ENTSR will take time to complete, and considers that the reasons set out above require action to revise the existing Interim Decision prior to the conclusion of the wider, multi-annual review in order to promote efficiency, the use of indigenous renewable, sustainable or alternative forms of energy, and protect the interests of customers in the market.

Given these reasons, **the CRU is minded-to implement its revised Interim Decision for the 2026/2027 tariff year** (i.e., publication of charges from 1 September 2026 to apply from 1 October 2026). The CRU is working with EirGrid to ensure that the CRU's decision further to this consultation process can be implemented as above. The CRU recognises that the annual network tariff calculation process is underway and that arrangements will have to be put in place to ensure that the CRU's decision on this matter is appropriately reflected for the upcoming tariff year. The CRU acknowledges EirGrid's co-operation on this matter.

The proposed change will remain an Interim Decision and aims to deliver charging arrangements which are more aligned with the operational nature of ESUs including their role in providing balancing and congestion relief.

5. Responding to this Paper

The CRU is seeking feedback on its minded-to Interim Decision. Responses to this consultation should be submitted through the dedicated CRU consultation by close of business on 13 May 2026.

Specifically, the CRU requests feedback on the following questions:

1. Do you agree with the CRU's minded-to position to remove D-TUoS for ESUs and charge on the basis of G-TUoS and not D-TUoS, consistent with other generation units?
2. Do you agree with the reasons stated for the position, which are that replacing D-TUoS charges for ESUs with G-TUoS:
 - provides a locational siting signal for ESUs;
 - promotes a level playfield across ESUs located across the SEM;
 - promotes a level playing field between ESUs and generators within the SEM; and
 - promotes ESUs' ability to provide system benefits in wholesale markets by removing the distortions of volumetric charging?
3. Do you have any feedback regarding the CRU's proposed implementation of its decision?
4. Should the CRU be considering other factors in evaluating the effectiveness of this interim decision and in future work regarding a more enduring decision?

It is not mandatory to answer all the questions in this consultation. Unless marked confidential, all responses from companies or organisations will be published in full on the CRU's website.

Respondents may request that their response is kept confidential. The CRU shall respect this request, subject to any obligations to disclose information. Respondents who wish to have their responses remain confidential should clearly state this in their response and include the reasons for confidentiality. All respondents may be listed in a summary of responses, even those who request that elements of their response should be treated as confidential. Responses from identifiable members of the public will be anonymised prior to publication on the CRU website unless the respondent explicitly requests their personal details to be published.

Respondents should note that all material held by the CRU, including confidential consultation submissions, are subject to the Freedom of Information Act 2014 ('FOI Act') and the European Communities (Access to Information on the Environment) Regulations 2007 to 2014 ('AIE Regulations'). Therefore, such submissions may potentially be released in response to requests

made under the FOI Act and the AIE Regulations. The CRU privacy notice sets out how we protect the privacy rights of individuals [here](#).⁶⁵

The CRU will consider responses by stakeholders submitted by close of business on 13 May 2026.

Pending evaluation of consultation responses, the proposed interim decision will enable the implementation of new transmission network charging arrangements at the start of Tariff year 2026/2027.

Following implementation of the interim decision, the CRU will further consider consultation responses, insights from implementation of the interim decision and experiences from other jurisdictions in the analysis and development of an enduring tariff arrangement.

⁶⁵ The CRU Privacy Notice, see <https://www.cru.ie/privacy-notice/>.

Appendix: Methodology to Estimate Customer Impact

The CRU's minded-to position impacts the amount paid in transmission network charges by other D-TUoS and G-TUoS customers. The CRU sets out below a high-level estimate of this impact. As explained in Section 3.7, the estimated impact may be an over-estimate because it does not account for the contribution of ESUs to the G-TUoS revenue requirement up to the cap of €2.5/MWh set by EU Directive 838/2010.

Broadly, the approach seeks to estimate the existing D-TUoS revenue from ESUs by making an assumption over ESU capacity and energy withdrawals. Then it estimates the increase in D-TUoS charges required to recover that additional revenue from remaining D-TUoS customers.

The CRU uses two approaches to estimate ESU capacity and energy withdrawals:

- An approach using ESU energy consumption (MWh) data from EirGrid (“the EirGrid method”); and
- A bottom-up consumption per MW based on the average ESU cycle estimations for ESUs of different durations from the ECA study (“the ECA method”).⁶⁶

The EirGrid method uses EirGrid's data on annual energy consumption (MWh) from ESUs , which is c. 130 GWh in 2025. Under the ECA method, the CRU estimates that, based on ESU capacity connected to EirGrid's transmission grid (834 MW in 2025) and average ESU cycles per day from the ECA study, annual energy consumption from ESUs is c. 200 GWh in 2025.

Using both approaches, the CRU estimates that D-TUoS revenue from ESS constitutes approximately 2% of all allowed revenue allocated to D-TUoS (including through the system services charge). This means the overall D-TUoS allocated to the remainder of the demand charging base increases by around 2%.

Given TUoS constitutes approximately 8% of the standard domestic electricity bill,⁶⁷ the CRU estimates that the average impact of the CRU's proposal is a c. 0.2% increase in the standard domestic electricity bill.

⁶⁶ ECA (21 March 2025), Network charges for energy storage, Figure 6.

⁶⁷ The CRU (18 October 2011), CRU's Electricity Network Tariff Structure Review: Objectives, Principles & Call for Evidence, CRU/21/123.

The CRU calculates the average increase for each D-TUoS component (i.e., the Capacity Charge, the Network Transfer Charge, and the System Services Charge) to recover the same revenue:

- The Capacity Charge allocated to the remainder of the demand charging base increases by c. 5% under both methods;
- The Network Transfer Charge allocated to the remainder of the demand charging base increases by less than 0.2% under both methods; and
- The System Services Charge allocated to the remainder of the demand charging base increases by c. 1% under the EirGrid method, and c. 2% under the ECA method.⁶⁸

As a sensitivity, the CRU also estimated the impact of its minded-to position under the assumption that ESU capacity in Ireland (excluding pumped storage) increases to c. 1,510 MW by 2030, as per the TSOs' All-Island Resource Adequacy Assessment 2026-2035 (AIRAA).⁶⁹ The CRU assumes that all other factors remain constant, in particular the allowed revenue to be recovered under D-TUoS, total demand from all other demand customers, and the proportion of D-TUoS recovered from the different components. For this sensitivity, the CRU estimates that:

- Total D-TUoS recovered from the remaining demand customers increases by c. 3.5% under the EirGrid method and c. 3.9% under the ECA method. This implies an average increase of the standard domestic electricity bill of c. 0.3%.
- The Capacity Charge allocated to the remainder of the demand charging base increases by c. 10% under both methods.
- The Network Transfer Charge allocated to the remainder of the demand charging base increases by c. 0.2% under the EirGrid method and c. 0.3% under the ECA method.
- The System Services charge allocated to the remainder of the demand charging base increased by c. 2% under the EirGrid method and c. 4% under the ECA method.

For this sensitivity, the CRU estimates that annual consumption from ESUs in 2030 is c. 230 GWh under the EirGrid method, and c. 370 GWh under the ECA method.

The CRU makes the following assumptions to estimate the average impact of the minded-to interim decision on demand customers:

⁶⁸ The CRU notes that average impacts estimated under the ECA method are in general higher than under the EirGrid method. This is because under the ECA method, the estimated annual energy consumption (MWh) of ESUs in Ireland is higher than under the EirGrid method.

⁶⁹ EirGrid and SONI (2025), All-Island Resource Adequacy Assessment 2026-2035, p 99.

- Under both methods, to obtain the total ESU capacity, the CRU considers the registered capacity of transmission-connected ESUs in Ireland, i.e., c. 834 MW. This capacity excludes Turlough Hill which already pays TUoS on the basis of G-TUoS. By omitting distribution-connected ESUs, the CRU notes these estimates carry the risk of underestimating the tariff impact. However, this impact is likely to be small as the share of ESUs connected directly to the distribution network is relatively small in terms of the total MW capacity.
- Under both methods, the CRU assumes that ESUs charge (i.e., consumes energy) during the off-peak ToU band, which means the higher System Services Charge rate for the peak window does not apply.
- Under both methods, the CRU assumes zero MWh unauthorised usage by ESUs.
- Under the EirGrid method, the CRU assumes that annual energy consumption from ESUs per unit of capacity stays constant. To estimate annual energy consumption from ESUs in 2030, the CRU first divides total ESU capacity (in MW) by annual consumption from ESUs in 2025 (in MWh), to calculate energy consumption per unit of capacity. The CRU then multiplies ESU capacity for 2030 by the ratio from the first step to arrive at the estimate of annual energy consumption from ESUs in 2030.
- Under both methods, to estimate the impact on the individual components of D-TUoS, the CRU first calculates ESU payments of each D-TUoS component (i.e., the Demand Network Capacity Charge, the Demand Network Transfer Charge, and the Demand System Services Charge). The CRU assumes that the proportion of D-TUoS recovered from each component remains constant. The CRU then estimates the average increase in each charging component that the remaining demand customers face. In other words, the CRU assumes that the revenue recovered from ESUs e.g., through the Demand System Services Charge will be recovered by the remaining demand customers through the Demand System Services Charge, not another component of D-TUoS.