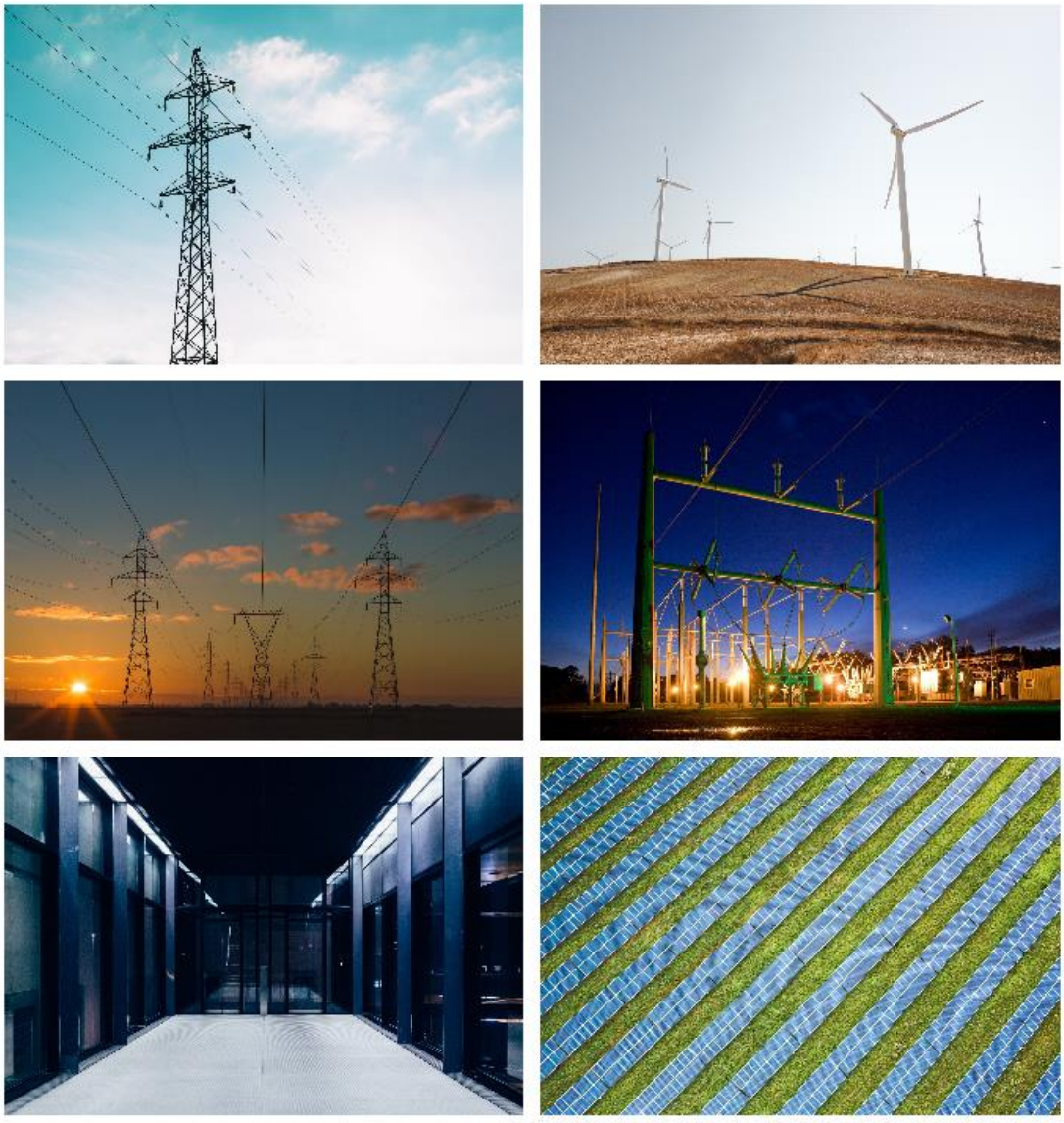
2024

Finsbury Infrastructure's Response to CRU Consultation on Large Energy User Connection Policy CRU/2024001



18th March 2024

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1. Introduction

We welcome the opportunity to respond to the CRU's consultation on Large Energy User Connection Policy CRU-2024001. We have included our response to the specific questions raised in section 3 of this submission below.

Finsbury Infrastructure, headquartered in Dublin, is an Irish-owned infrastructure company committed to the development of Low Carbon Energy Parks. Our founders bring a rich background in spearheading low carbon energy initiatives across Ireland, the UK, and Australia, with a track record of developing over 15GW of energy projects with over 1GW projects grid connected to date. Established in January 2023, Finsbury Infrastructure aims to integrate digital infrastructure with on-site low carbon energy solutions. Our projects are poised to inject €4bn into the local economy and create more than 700 full-time equivalent (FTE) jobs, marking a significant economic contribution. We are eager to maintain our collaborative efforts with the Commission for Regulation of Utilities (CRU), System Operators, and various governmental agencies, as we believe our projects will substantially benefit the economy and ensure Ireland remains as a leading destination for foreign direct investment.

2. Background

This document articulates Finsbury Infrastructure's comprehensive response to the Commission for Regulation of Utilities (CRU) consultation concerning Large Energy Users (LEUs). LEUs are integral to Ireland's economic fabric, with data centres emerging as a crucial subset. Far from being mere infrastructure, these centres are foundational to a modern economy, enabling technological advancements and lifestyle shifts that were once hard to imagine. This includes facilitating remote work, significantly reducing the necessity for daily commutes to major urban areas. Ireland, with its youthful, dynamic, and open economy, has strategically positioned itself at the digital forefront, making significant progress towards a future shaped by digital innovation. The advent of artificial intelligence places Ireland on the brink of global leadership, a coveted position promising a brighter future for the next generation.

Ireland's stature as a premier digital economy is recognized not only in Europe but globally. The "Harnessing Digital: The Digital Ireland Framework1" of 2022 positions Ireland as the 5th most advanced digital economy within the European Union. The digital sector stands as a pillar of the Irish economy, employing 478,000 individuals and generating €280 billion in annual exports. The impact of the digital economy transcends numbers; it is the backbone of numerous homes, businesses, and towns across Ireland. A significant portion of Ireland's tax revenue is sourced from multinational corporations specializing in digital services, including industry giants such as Microsoft, Amazon, Facebook, Google, and LinkedIn.

[1]Harnessing Digital - The Digital Ireland Framework https://assets.gov.ie/214584/fa3161da-aa9d-4b11-b160-9cac3a6f6148.pdf

The Government's Statement on Data Centres highlights the indispensable role of these facilities, describing them as "core digital infrastructure"[2] vital to our economy and society. They underpin nearly all online facets of our social and work lives, encompassing video calling, messaging, apps, retail, banking, travel, media, and the delivery of public services like healthcare and welfare.

However, the proposals in the current consultation threaten to impose undue discrimination and punitive measures on LEUs that have chosen to invest in Ireland, necessitating urgent reconsideration. The potential enactment of policy measures that could significantly hinder investment in Ireland poses a considerable risk, undermining the efforts and aspirations of countless Irish families and communities. These stakeholders have invested immense effort to attract investment to our shores. We are at a pivotal moment, reminiscent of Ireland's "Brexit" moment, where it is crucial to avoid advancing policies with far-reaching consequences without broad government support.

3. Consultation Questions:

Q1: Comments are invited from interested parties on the categories of LEU in electricity and gas to which this policy should apply (e.g. for electricity is DG10, DTS-T is appropriate, should DG6-DG9 be included, should the definition focus on capacity or usage, should a combination of criteria be applied?).

A1: LEUs should be considered DG7-DG10 and transmission connections. We believe they anything above 10MW should be considered as a LEU. The criteria should be based on max capacity, not electricity usage, i.e. Mega-Watt capacity, not Mega-Watt hour used.

Q2: Please provide views on whether this proposed policy should apply to capture smaller LEUs in due course, and if so which categories of LEU and on what timeline should this occur. Please provide rationale for any views shared.

A2: The policy should cover all LEUs. There is no reason why one LEU should be treated differently to another. This type of approach would lead to inefficiencies, and potentially perverse consequences. Larger energy users generally have the ability to be more efficient with their energy use, and thus many smaller LEUs could result in less efficient use overall.

Q3: Comments are invited from interested parties on the proposed use of a transition period/glide path in relation to (i) the changing requirements at time of connection on the transition to zero real time emissions, and (ii) once connected, the changing requirements as the project transitions closer to real time zero e.g. from non-firm connection to firm connection linked to milestones.

A3: Hourly matching of renewable energy to demand seems to be premature. Considering the amount of renewable energy that will be available, it will be almost impossible to have real time matching of LEU demand with renewable generation. We consider that CPPA's on an annualised basis are more appropriate, as more renewables come online over the next decades, requirements for more granular temporal matching should be brought in. Many of clients operating in the industry are already some of the leading corporates for use of renewable energy.

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[2] Goverment Statement on Data Centres in Ireland's Enterprise Strategy
https://enterprise.gov.ie/en/publications/publication-files/government-statement-on-the-role-of-data-centres-in-irelands-enterprise-strategy.pdf

Q4: Please provide views on the proposed timing of different options.

NA

Q5: Should optionality be maintained in allowing a menu of different options to perspective LEUs, with the end net zero emissions target becoming more binding as the glide path advances?

A5: Optionality should always be encouraged, however the query posed is ambiguous and undefined.

Q6: Comments are invited on how compliance and enforcement with required provisions can be effectively implemented in the operation of a transition period/glide path approach.

NA

Q7: Comments are invited on the approaches used to account for net zero emissions. This could include timestamped GOs or renewable certificates. Please provide reasons and rationale for any views provided.

A7: All reporting should align with The EUs Sustainability Reporting Standards (ESRS).

Q8: Should the end target/goal be real time zero emissions? Do respondents have other suggestions as to how this can be demonstrated? Please provide reasons and rationale for any views provided

A8: All reporting should align with The EUs Sustainability Reporting Standards (ESRS).

Q9: Comments are invited on the use of a glide path to implement the basis on which net zero emissions are determined. This could entail starting with measuring net zero performance on an annual basis and moving closer to more real time arrangements in incremental steps.

A9: All reporting should align with The EUs Sustainability Reporting Standards (ESRS).

Q10: Comments are invited on the use of self-reporting based on best available data/methodology and transitioning to a more robust formal framework over time when it becomes available.

A10: All reporting should align with The EUs Sustainability Reporting Standards (ESRS).

Q11: Comments are invited on the requirement for indigenous sources of renewable energy e.g. renewable electricity feeding into the Irish system and for gas secure sufficient renewable gas credits feeding into Irish system.

A11: We support the governments targets for renewable energy targets however we are aware that many companies are struggling to get grid connections for renewable projects. The reasons of this are manyfold, planning delays and restrictions in offer processing in ECP rounds are two of which. This is a matter for the CRU / SOs and government to unblock the system. Ireland is part of the European Union, and thus should have access to procuring renewable gas from other EU countries. There also may not be sufficient feedstock on the island of Ireland to support the required level of gas generation.

Q12: Comments are invited on how the storage of renewable energy is captured by any measurement system when this stored renewable energy is used.

A12: At the time of writing we are not aware of any way to 'timestamp' technology to determine the carbon intensity (g.CO2/kWhe) of an electron.

Q13: Comments are invited on whether the electricity and gas measuring and tracking systems should be integrated to help avoid double counting? If so, how might this be achieved?

A13: Measuring of electricity and gas usage should align with The EUs Sustainability Reporting Directive.

Q14: Comments are invited on who should have responsibility for measuring LEUs emissions and emissions abatement performance?

A14: Reporting should align with The EUs Sustainability Reporting Directive.

Location of LEUs

Q15: Should new LEUs be located close to areas of renewable generation and/or storage or within energy parks? Please provide reasons and rationale for any views provided.

A15: LEUs should be sited in locations where renewable energy can be accessed. However, this may not always be possible. There are unintended consequences in bringing forward policy which supports this. Ireland anticipates generating large amounts of offshore wind in the coming years and the government anticipates generating in excess of 178 TWH of renewable energy by 2050. This will lead to an oversupply of at least 80TWH[3]. If these estimates ring true, we will have a system which is capable of handling any large LEU. If policy is introduced which precludes LEUs from connecting in certain areas of the country, we may miss out on the opportunity.While locating in areas of high renewables makes sense from a power perspective, data centre's also have other site selection criteria that they need to assess. These relate to availability of fibre, workforce, land zoning and others. It is a known fact that data centres want to locate close to other data centres. Many 'packets' of information, or collections of bytes, are sent directly from one data centre to another, inside availability zones. It is these criteria that encourage data centres locating close to one another in already established zones, and can stop them from spreading out more, for example to the west coast of Ireland.

Q16: What type of measures to facilitate this approach could be introduced to encourage new LEUs to locate close to renewable generation?

A16: Development plans should support the co-location of demand and generation in the form of "energy parks". Allowing demand and generation share a grid connection should be encouraged. Facilitation of multiple generation sources under a single grid connection sharing an MEC should be facilitated. The Dept of Energy are currently consulting on private wires. This should progress at speed and would encourage direct wires into large generation. Delaying this only prohibits future investment into Ireland.

[3] 37GW offshore Wind – 178TWH. Ireland's electrical demand to rise to 98TWH by 2050 resulting in excess of 80TWH.
https://enterprise.gov.ie/en/news-and-events/department-news/2024/march/240308.html#:~:text=Ireland's%20target%20to%20generate%20at,Union%20and%20a%20657GW%20global
https://assets.gov.ie/265468/14606532-28d5-4108-b315-6c4f6327e64d.pdf

Q17: Should there be any exemptions to locational requirements for certain LEUs? How could this be assessed? If so what type of connection conditions/requirements might these require?

Imposing locational restriction on LEUs is discriminatory. LEUs will locate in areas where they have access to population, infrastructure and that ties in with their overall operational business strategy. A business will not locate in Donegal if all their other business is located in the Greater Dublin Area. From an operational excellence perspective, and from a cost perspective this would be prohibitive. If such measures are introduced which preclude LEUs from locating in certain areas, it will lead to operators of LEUs leaving for other jurisdictions.
If locational restrictions are implemented, data centres which fulfil the governments criteria should be excluded from these restrictions. For example, if a data centre provides on site generation, battery storage and an additionality of renewable energy it should be allowed to locate in otherwise restricted zones.

Q18: Comments are invited from interested parties on the level of proximity between LEUs and renewable generation? How should this be measured? Should this value apply across the board or be determined on a case-by-case basis?

A18: This should be determined on a case by case basis and where an investment case will determine the answer. Introducing a 'one size fits all' approach could lead to unintended consequences. A windfarm located 5km away from a pharma plant may work in one area and not another based on wind output or demand by the pharma plant.

Q19: If locational requirements are introduced, there is a need for better integrated planning of the network, generation and demand. What are the roles of the System Operators and enterprise agencies in supporting/facilitating this?

The system operators and policy makers need to concentrate on delivering energy generation infrastructure including upgrading lines and substations and deliver on its stated ambitions rather than looking to restrict demand users.

There also needs to be greater joined up thinking between gas system operators and electricity system operators, all measures implemented in terms of LEU proximity to renewable generation should also take into account proximity to gas infrastructure.

Q20: If introduced on a mandatory basis should locational requirements be implemented using a glide path?

No as stated above all necessary means to deliver sustainable generation projects need to be implemented rather than restrict demand users based on location. Restrictions have already inhibited investment and policy makers / government needs to ensure infrastructure is delivered for a future economy.

Policy supporting locational requirements should be implemented on a phased basis, with achievable goals. We believe that there should be no locational requirements imposed on LEUs.

Q21: Should non-firm LEU connections be introduced? If so, should these non-firm connections be made on an enduring basis? Please provide reasons and rationale for any views provided.

While flexible connections should be considered, introducing flexible connections will only work whereby LEU can bring on their own generation in lieu of grid power to ensure there is no loss of power. It would be helpful if the SO can determine for how long such flexible connections would be

required for and for how many hours such arrangements would be required. This will all tie into decisions that will be required as part of investment decision.

It is likely that an LEU will have a stable demand curve over the course of a year. In this eventuality, consideration will need to be given to the nature of this non flexible demand connection. The Regulatory Authority should also note, that on-site generation will need to be used to pick up the shortfall in import capacity - this is likely to be in the form of gas generation, if the import is suspended for a long enough period of time.

It should note that connections behind the metering point are currently dis-incentivised in the capacity market, in that they are subject to a 47% de-rating. The same technology connected in front of the meter is subject to an 80% de-rating factor.

Q22: If non-firm LEU connections are implemented on a temporary/non-enduring basis what should trigger these connections being made firm? e.g. date(s) specified upfront, linked to certain requirements. Please provide reasons and rationale for any views provided.

Clear timelines need to be introduced to allow for an LEU to make plans for providing onsite generation if required. Firm, confident timelines are necessary for LEUs to make investment decisions. The dates should be specified up front, as firm/non-firm connections will be a key input to any financial model on the LEU operator side. The MW capacity of connections that is non-firm will dictate the amount of on site generation that is needed, as well as determining the technology that will have to be used.

Q23: If non-firm LEU connections are mandatory in certain parts of the system, should there be any exemptions for certain LEUs? If so what type of connection conditions/requirements might these require?

Where an LEU can provide onsite dispatchable power to the grid operator by was of BESS equal to 100% of its MEC, LEUs should be exempt from non-firm LEU connections. BESS can allow for a greater percentage of renewable energy. BESS connections can be flexible, batteries generally will charge at night time and discharge during the day when there are higher wholesale prices. This should alleviate issues with capacity on the grid.

Q24: Comments are invited regarding the proportion of the LEU demand that would be connected on a non-firm basis. For example, would a non-firm connection apply to 100% of the connection, or would it apply to a smaller portion than this?

A percentage of megawatt capacity is somewhat arbitrary. LEUs should be provided with MW capacity that is available at that node, and not restricted by an arbitrary percentage.

Q25: Comments are invited regarding what incentives could be applied to facilitate non-firm LEU connections. Should these incentives recognize the potential locational value of these?

Private wire policy should be fast tracked. This will incentivise LEUs to locate in areas where renewables are the strongest. LEUs that develop private energy generation, do so off their own backs, and can generate renewable energy that does not cost the taxpayer.

Q26: How should the SOs deploy this flexibility provided by non-firm demand?

We assume that this question applies to the reallocation of capacity to LEUs with non-firm connection. It should be allocated on a pro-rata basis.

Q27: Should non-firm/flexible electrical connections be provided to islanded LEUs in order to facilitate flexibility between the electrical and gas systems?

The grid operator should seek to provide access to project which can enhance the flexibility of the grid, therefore allowing for a greater amount of renewable energy. Hybrid demand connections for projects with dispatchable onsite battery storage should be supported.

Q28: Comments are invited on the use of renewable generation and storage on-site. Should this be used to match LEUs demand on-site or to provide flexibility services to the system? Please provide reasons and rationale for any views provided.

Onsite energy storage should be encouraged as a means of offsetting demand on the system at peak hours. For this reason, the CRU should account for this in the processing of BESS applications and remove current policy that allows only 10 projects a year to be connected. Onsite renewable generation (non-renewable gas) cannot be used to match LEU demand. Due to the nature of LEU demand profiles, intermittent renewables cannot match a baseload profile.

Q29: Should the use of on-site dispatchable generation using only renewable fuels have limited run hours, to reflect limited availability of an indigenous renewable fuel? Please provide reasons for any views provided.

There should be no run hour limitations for on-site generation once they are not imposed by the emissions licensing. If renewable gas is not sufficient, natural gas should be used as a fuel for gas fired generators.

Q30: Do LEUs require back-up generation for operational reasons? If so, what is the typical annual running hours of this back-up generation?

LEUs require back-up generation for backup reasons to ensure the plant runs smoothly at times of failure or forced outages. Consideration of 50 hours running for maintenance and up to 200 hours for forced outages so long as outage can come back online within the 200 hours timeframe.

For a data centre the following criteria is used from the Uptime Institute and should be used as a guide

	Tier			
	I	II	III	IV
Uptime	99.671% uptime per year	99.741% uptime per year	99.982% uptime	99.995% uptime per year
Downtime	Maximum of 28.8 hours of downtime per year	No more than 22 hours of downtime per year	≤1.6 hours of downtime per year	≤26.3 minutes of downtime per year

Q31: What should demand flexibility services provided by new LEUs be used for, system support, decarbonisation or both? Please provide reasons and rationale for any views provided.

We believe that both of these strategies work in tandem. We support the use of demand flexibility to support system security, and also to reduce the carbon intensity of the grid.

Q32: Should demand flexibility services be mandatory or voluntary for new LEUs? Please provide reasons and rationale for any views provided?

We support the promotion of demand flexibility where LEUs can reduce their electricity demand when told to do so by the TSO. In the case of data centres, demand reduction however will **not** manifest in generation reduction, but will rather be matched a mixture of on-site generation/battery technologies

to cover the demand reduction volume. Behind the meter connections (in a microgrid configuration) can allow for high levels of demand side reduction, however this is dis-incentivised in the capacity market with demand side units being derated heavily in current market arrangements.

Q33: Should LEU connections in certain parts of the network be required to provide demand flexibility services? Is this measure justified?

NA

34.If demand flexibility is voluntary for new LEUs, what type of incentives could be introduced to encourage the adoption of these services?

Demand flexibility for data centres would materialise in the form of microgrids. Where a direction to ramp down demand is given by the TSO, the microgrid must ramp up generation, currently this is most likely to be in the form of gas fired generation. The capacity market currently de-rates demand side units to 47% of their nominal capacity.

Table 1 - Initial Capacity Marginal De-Rating Curves by Technology Class and Initial Capacity

Initial Capacity (IC) (MW not de-rated)	DSU>6 hrs[1]	Gas Turbine	Hydro	Steam Turbine	Interconnector[23]	System Wide[4]
0 ≤ IC ≤ 10	0.614	0.890	0.883	0.756	0.565	0.844
10 < IC ≤ 20	0.607	0.882	0.880	0.751	0.564	0.840
20 < IC ≤ 30	0.601	0.876	0.877	0.746	0.563	0.836
30 < IC ≤ 40	0.596	0.870	0.874	0.742	0.563	0.833
40 < IC ≤ 50	0.591	0.865	0.872	0.738	0.562	0.829
50 < IC ≤ 60	0.587	0.861	0.870	0.734	0.561	0.825
60 < IC ≤ 70	0.582	0.860	0.867	0.731	0.560	0.821
70 < IC ≤ 80	0.577	0.858	0.865	0.727	0.559	0.818
80 < IC ≤ 90	0.572	0.857	0.862	0.723	0.559	0.814
90 < IC ≤ 100	0.567	0.855	0.860	0.719	0.558	0.810
100 < IC ≤ 110	0.562	0.853	0.857	0.715	0.557	0.807
110 < IC ≤ 120	0.557	0.851	0.855	0.710	0.556	0.803
120 < IC ≤ 130	0.553	0.849	0.852	0.706	0.555	0.799
130 < IC ≤ 140	0.548	0.847	0.849	0.702	0.554	0.795
140 < IC ≤ 150	0.543	0.844	0.847	0.698	0.553	0.792
150 < IC ≤ 160	0.538	0.842	0.844	0.694	0.553	0.788
160 < IC ≤ 170	0.533	0.839	0.841	0.689	0.551	0.784
170 < IC ≤ 180	0.528	0.837	0.838	0.685	0.550	0.780
180 < IC ≤ 190	0.523	0.834	0.835	0.681	0.550	0.777
190 < IC ≤ 200	0.518	0.832	0.832	0.676	0.548	0.773
200 < IC ≤ 210	0.514	0.829	0.829	0.672	0.547	0.769
210 < IC ≤ 220	0.509	0.827	0.826	0.667	0.547	0.765
220 < IC ≤ 230	0.504	0.824	0.823	0.663	0.545	0.762
230 < IC ≤ 240	0.499	0.822	0.820	0.659	0.544	0.758
240 < IC ≤ 250	0.494	0.819	0.817	0.654	0.543	0.754
250 < IC ≤ 260	0.490	0.816	0.813	0.650	0.542	0.750
260 < IC ≤ 270	0.485	0.813	0.810	0.645	0.541	0.747
270 < IC ≤ 280	0.481	0.809	0.806	0.641	0.539	0.743
280 < IC ≤ 290	0.476	0.806	0.802	0.636	0.538	0.739
290 < IC ≤ 300	0.472	0.803	0.798	0.631	0.536	0.735
300 < IC ≤ 310	0.467	0.800	0.795	0.627	0.535	0.732

For example, a 300MW gas plant, if connected to the grid could bid into the capacity market with a de-rated capacity of 240MW. If that same plant was connected to a LEU directly, could only bid in with 140MW, resulting in a 42% decrease in capacity payments, even though the technology would be identical, and would be providing the same amount of electricity.

Demand side response should not be de-rated to such an extent. De-rating values need to be reconsidered to incentivise demand side response.

Q35: If demand flexibility is mandatory for new LEUs, should there be any exemptions for certain LEUs to having to provide these services? How could this be assessed? On what basis could these exemptions be applied?

If LEUs are able to provide additionality to the electricity grid, in terms of renewable generation and in terms of dispatchable generation, there should be no need to impose demand flexibility on them.

36.Should timed/profiled connections be introduced? Please provide reasons and rationale for any views provided.

Our assumption here is that timed connections refer to periods of the day where the capacity of such a connection is reduced.In the event that flexible connections are implemented, timed connections should be introduced. Allowing an LEU to prepare for and factor in demand reduction events into financial and operational models is absolutely key.

37.Comments are invited from interested parties on the use of waste heat from LEU sites.

Waste heat is a resource which can be used in certain circumstances. Heat from a power plant versus a pharma plant v a data centre are completely different. We would suggest that all industrial customers should seek to provide infrastructure to the edge of their site to allow for future capability to be connected into by the council or other third party users. A big challenge is the additional infrastructure required to get the useable heat to a user. AWS have been involved in a very good example of this in South Dublin but it was only with the support of the council that allowed for this to happen. In many cases heating infrastructure is not in place and heat pumps can be a more cost effective solution of providing heat to homes and businesses however we continue to monitor all available technologies.

38.Comments are invited on the use of waste heat from LEUs to feed district heating networks or other processes.

See comments on Q37

39.Should provisions to use waste heat from new LEUs in suitable locations to feed district heating or other processes be mandatory or voluntary? Please provide reasons and rationale for any views provided.

See comments above. All industrial customers should be encouraged to provide infrastructure for capturing waste heat to the edge of their site to allow for the councils access to it, however it is the responsibility of the council or users of the waste heat to take this heat from the site to point of use.

40.Comments are invited from interested parties on the use of biomethane towards decarbonisation of LEU demand. Do respondents have a view on the volume of indigenous biomethane that can be produced annually? Do respondents have a view on the scalability of using biomethane towards the decarbonisation of LEU demand?

We support the governments ambitions in the use of biomethane and its strategy for 5.7TWH of energy to be produced by 2030. The government should bring forward supports to help farmers divest their activities outside of rearing cattle for beef and milk production. This strategy needs to be developed at haste and we welcome the governments ambitions however we are conscious that the average AD plant in Europe is 35GWh[4] resulting in the need for 162 plants to be operational to allow the government meet its own targets. While we support the ambitions we also believe that the LEU industry should not be left in a position whereby it has to wait for the government to deliver on its own strategy in advance of making investment decisions.

[4] Ireland's Draft National Biomethane Strategy https://assets.gov.ie/282319/b82783de-f66b-49e1-9bd2-ed2d6442b199.pdf

41.Comments are invited on what running profile should be adopted by onsite gas generation which is being run on a limited supply fuel like biomethane e.g. should it be limited running for back-up and/or flexibility purposes, or baseload (islanded LEU). If for flexibility services what would be a typical capacity factor.

If the gas is available, the runtime of the plant should not be restricted (unless by the EPA). The runtime of a gas plant is determined by the short run marginal cost, and dispatched centrally. A generic peaking plant would be expected to run anywhere in the region of 500-1500 hours per year, depending on the plant efficiency.

42.Comments are invited from interested parties on the use of green hydrogen towards decarbonisation of LEU demand and the timelines in which this might be viable. Please provide reasons and rationale for any views provided.

We encourage the use of all available cost effective technologies. Similar to wave and tidal technologies green hydrogen is in its infancy and has yet to be proved that it can be a cost effective alternative solution on the Irish grid. There are many test cases throughout Europe however battery energy storage is a more cost effective solution to providing green energy by storing energy from either the grid or directly from renewable sources and then back to either the grid or LEU at times of need.

43.Comments are invited from interested parties on the renewable gas certification scheme.

NA

44.Are there other options for decarbonisation of gas demand that should be considered?

NA

45.Comments are invited on the introduction of non-firm/interruptible gas connections for LEUs (at exit point). Do respondents have a view on whether these nonfirm/interruptible connections can help alleviate emissions? Please provide reasons and rationale for any views provided.

Before the introduction of non-firm gas connections, serious thought and engagement needs to be completed between Eirgrid and GNI. Gas demand and electricity demand both see peaks at the same time. Peaking plants for example may run for 4 hours each day, gas supply should not be restricted at times of peak electricity demand.

46.How can demand flexibility services on the gas system provide a benefit for both system support and decarbonisation?

NA

47.Comments are invited from interested parties on maintaining optionality in what provisions an LEU must meet as part of its net zero emissions requirements.

NA

48.Comments are invited on how a new LEUs location may inform what criteria it may need to meet.

If the LEU is in a constrained zone we anticipate there should be a greater level of flexibility in terms of electricity connection. Projects which can provide flexibility to the grid by way of generation should not be restricted by location.

49.Comments are invited on how a transition period may inform an evolving net zero target and demand flexibility services that could be provided.

There should be a transition period from annual net zero through to hourly net zero. We do not believe that there are sufficient measuring mechanisms to provide real time matching of net zero. For example, gas metering is only granular to the hour, and not real time.

50.Respondents are welcome to suggest alternative approaches in how criteria is selected.

It is unclear what criteria this question is referring to. No specific criteria has been outlined in this consultation.

51.Respondents are welcome to suggest any additional approaches for LEUs to help meet net zero requirements not considered in sections above.

LEUs generally have their own comprehensive environmental strategies. Please refer to these for more information.

53.Comments are invited on what functions should be carried out by who, in the context of potentially real time net zero emissions for LEUs going forward.

Please refer to the European Sustainable Reporting Directives for guidance.

54. Feedback is requested from stakeholders on other mechanisms that may need to be considered for the implementation of SECs and who should be responsible for delivering them.

FINSBURY
INFRASTRUCTURE

62 Lower Baggot St
Dublin 2
michael.moore@finsbury-infrastructure.com
www.finsbury-infra.com