

## Laure Antoniotti

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**From:** Eoghan McCarthy <[REDACTED]>  
**Sent:** Wednesday 23 January 2019 09:51  
**To:** RSES  
**Cc:** Ann Marie Colbert; Fiona O'Connor  
**Subject:** Gas Networks Ireland's response to Draft Regional Spatial and Economic Strategy  
**Attachments:** GNI Response\_Draft Regional Spatial and Economic Strategy Eastern and Midland Region\_23.01.19.pdf

To whom it concerns,

Please find attached Gas Networks Ireland's response to the Draft Regional Spatial and Economic Strategy. Gas Networks Ireland would welcome the opportunity to discuss this response with you in more detail.

If you have any questions or require any clarifications with regard to the attached consultation response please let us know.

Kind regards,

Eoghan

**Eoghan Mc Carthy** | *Commercial Analyst*  
*Commercial Analysis, Commercial Department*

**Gas Networks Ireland**  
P.O. Box 51, Gasworks Road, Cork, Ireland

**T** [REDACTED] | **M**  
**E** [REDACTED]

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Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimiscthe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghníomh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire.

Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdraithe. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairreachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláráithe 555744 agus a tá hoifig chláráithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

[REDACTED]

Ceanncheathrú  
Bóthar na nOibreacha Gáis  
Corcaigh, T12 RX96  
Éire

Headquarters  
Gasworks Road  
Cork, T12 RX96  
Ireland



T +353 21 453 4000

F +353 21 453 4001

[gasnetworks.ie](http://gasnetworks.ie)

Eastern & Midland Regional Assembly  
3rd Floor North, Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin 9  
D09 C8P5

23<sup>rd</sup> January 2019

**Re: Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region**

Dear Sir/Madam,

Gas Networks Ireland welcomes the opportunity to respond to the consultation on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Gas Networks Ireland is a fully owned subsidiary of Ervia (formally known as Bord Gáis Éireann). It owns, operates, builds and maintains the gas network in Ireland and ensures the safe and reliable delivery of gas to its customers. The company transports natural gas through a 14,172km pipeline network. This supplies energy to over 688,000 customers, including businesses, domestic users and power stations. Gas Networks Ireland believes that the gas network is integral to Ireland's energy system and future.

Gas Networks Ireland is playing its part in driving environmental change for the benefit of all the citizens of Ireland through its development of CNG<sup>1</sup> infrastructure for gas in transport and renewable gas injection infrastructure. Gas Networks Ireland welcomes the significant acknowledgement of climate change issues in section 7.8 of the strategy document, and the adoption of systems to measure emissions along with emissions reductions targets.

Gas Networks Ireland is very supportive of the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and would like to take this opportunity to highlight sections of the report where the gas network and the decarbonisation initiatives being carried out by Gas Networks Ireland could be included.

### **Section 7.3 A Clean and Healthy Environment**

**Air Quality:** Gas Networks Ireland agrees that the protection of air quality requires cross sectoral policy responses to address air pollution emissions. Gas Networks Ireland is actively working to provide consumers with access to alternative cleaner fuels such as renewable gas for home heating and transport. This section which references the transitioning of public transport and Local Authority fleets to electric vehicles could also include CNG powered commercial vehicles which would dramatically improve air quality relative to diesel.

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<sup>1</sup> Compressed Natural Gas (CNG) is a fuel used in the transport sector which reduces transport emissions.

### Section 7.7 Landscape

**Farming:** The strategy document references the use of anaerobic digesters to produce renewable energy. The use of anaerobic digesters to produce biogas, a carbon neutral and sustainable fuel, has the potential to significantly reduce carbon emissions in the Eastern and Midlands region and also contribute to reduced agricultural emissions. Biogas upgraded to biomethane (also known as renewable gas) can be injected into existing gas infrastructure, and is identical in form and performance to natural gas. Therefore the existing gas network and end consumer equipment can be used without the need for expensive conversions. In addition to the emissions benefits, anaerobic digestion development can create jobs both in construction and ongoing operation and maintenance of the facilities. The production of renewable gas can also provide farmers with an additional revenue stream.

### Section 7.8 Climate Change

**Support transition to a low carbon, circular & climate resilient region:** Renewable gas is at the heart of the bio-economy particularly when it is produced from food and farm waste. This renewable fuel can then be used to heat homes via the gas network and power trucks and buses through CNG refuelling.

**Decarbonising Electricity Generation:** Gas used to generate power is a cleaner alternative to peat, oil, and coal generation and GNI believes this warrants consideration for future power generation projects. Additionally gas powered stations offer flexibility, complementing the intermittent nature of renewables such as wind.

Carbon Capture and storage (CCS) is a proven technology and can capture over 90% of the CO<sub>2</sub> from the exhaust stream of CCGTs. Ervia (Gas Networks Ireland's parent company) is currently investigating the feasibility of using Kinsale gas field as a carbon storage facility. Combining renewable gas with CCS in CCGTs offers the prospect of net negative emissions for electricity generation in Ireland.

With regard to RPO 7.36 renewable gas would support a bio-economy plan for the region and could be specifically mentioned as a bio-fuel in the fuel mix.

**Decarbonising transport, sustainable settlement patterns and compact growth:** Heavy goods vehicles and bus fleets are large consumers of energy. The use of compressed natural gas in transport (which is a fuel that gives comparable range and power as diesel) results in 22% lower CO<sub>2</sub> and 99% lower particulate matter emissions. In addition to emissions benefits, when the production of renewable gas is scaled up and used in transport as bio-CNG, even greater lifecycle CO<sub>2</sub> emissions reductions can be achieved.

Gas Networks Ireland is currently building out a national network of public CNG fuelling stations with the most recent station in Dublin Port recording its first commercial transaction in December 2018. Gas Networks Ireland is also working with private fleet operators who want to build their own private CNG stations and connect to the gas network.

**Resilience of critical infrastructure:** The gas network is capable of withstanding extreme weather events. Winter 2017/18 had two severe weather events – extreme wind during Storm Ophelia that resulted in widespread loss of electricity supplies and there was a prolonged cold period with high

Ceanncheathrú  
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Corcaigh, T12 RX96  
Éire

Headquarters  
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Cork, T12 RX96  
Ireland



T +353 21 453 4000  
F +353 21 453 4001

[gasnetworks.ie](http://gasnetworks.ie)

winds during storm Emma. No gas outages were experienced as a result of either of these extreme events. Ireland's natural gas network consists of buried pipelines, which are not subject to the vulnerability of storms that can impact the delivery of oil or the transport of electricity through overhead wires. In addition, the routing of the gas network is designed to take account of flood plains, avoiding areas prone to flooding where possible. The gas network is a large piece of critical infrastructure in Ireland that is highly resilient.

### Section 10.3 Energy

**Future Electricity and Gas Supply and Demand:** Indigenous sources of natural gas and renewable gas, combined with gas storage and gas interconnectors, which are linked to the competitive and highly liquid UK gas market, provides Ireland with a secure energy future. GNI is working with a renewable gas producer to develop a Biomethane Network Entry Point (located in Co. Kildare) and the first injection to the Network is expected in Q1 2019.

Gas Networks Ireland supports RPO 10.15 but believes that a small amendment should be made to recognise that renewable energy can be delivered to both the gas and electricity networks.

*RPO 10.15: Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grids in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.*

Gas Networks Ireland believes that renewable gas, CNG, gas in power generation and carbon capture and storage can contribute to sustainable and secure energy sources into the future, significantly improve air quality and contribute to meeting carbon emissions targets.

If you have any questions or wish to further discuss Gas Network Ireland's response please feel free to get in contact. Gas Networks Ireland has a number of experienced people in the areas of renewable gas and CNG who are available to discuss this consultation response.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ian O' Flynn', written over a horizontal line.

Ian O' Flynn  
Head of Commercial

Gas Networks Ireland

