

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

12th April 2019

Re: Eastern and Midland Region Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019-2031

Dear Sir/Madam,

I am writing with regard to the Regional Assembly's request for feedback on the Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019-2031. Gas Networks Ireland (GNI) welcomes the opportunity to provide feedback on the proposed amendments.

GNI 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 14,000km pipeline network. This network 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 energy future.

GNI made a submission as part of the initial consultation on January 23rd 2019 and recommends that further consideration be given to two of the topics raised in this submission with a view to incorporating these into the strategy document. These topics are renewable gas¹ and compressed natural gas² (CNG) in transport. Including these in the strategy will support the development of these technologies in Ireland and a successful rollout of these technologies would result in decarbonisation benefits as discussed below.

Renewable gas can contribute significantly to decarbonisation and the circular economy (section 7.8). GNI recommends that references to renewable gas are included in section 7.8. A study³ was commissioned by Ervia (GNI's parent company), to develop and evaluate potential scenarios for the decarbonisation of the one million Irish residential homes currently connected to, or within close proximity to the existing gas network. The study concluded that renewable gas is the lowest cost option to decarbonise the domestic heat sector and avoids the need for deep retrofits to convert properties to an A BER rating required for electric heating to work effectively. Renewable gas

¹ [Renewable Gas](#)

² Compressed Natural Gas (CNG) is a fuel used in the transport sector which reduces transport emissions.

³ [Decarbonising Domestic Heating in Ireland](#)

produced through anaerobic digestion of organic wastes and residues by the agricultural sector is a carbon neutral and sustainable source of fuel. It is identical in function to natural gas so existing gas customers do not need to change equipment. GNI is currently working to develop renewable gas injection points on the gas network with a target of 20% renewable gas on the gas network by 2030.

Compressed natural gas (CNG) can assist in both the decarbonisation of transport (section 7.8) and improving air quality (section 7.3). When the production of indigenous renewable gas is increased and used in transport as bio-CNG carbon neutral transport can be achieved. Therefore, GNI suggests that the strategy document references CNG. CNG can contribute to decarbonisation of high energy usage vehicles, such as heavy goods vehicles (HGVs) and buses, where electricity is currently not a viable alternative to diesel. The conversion of HGVs and buses from diesel to CNG would result in a reduction in carbon emissions and would achieve an immediate improvement in air quality (99% less particulate matter, 70% less Nitrogen Oxide, and 80% less Sulphur Dioxide).

GNI would welcome the opportunity to discuss this response in more detail and can provide further information on the topics discussed, if required.

Yours sincerely,



Ian O'Flynn

Head of Commercial & Corporate Affairs

Gas Networks Ireland