

Commission for Regulation of Utilities (CRU)
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

15th April 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to contribute to the public consultation on the Gas Networks Ireland Ten Year Network Development Plan 2024 by the Commission for Regulation of Utilities (CRU).

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024 – 2025.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our Board and key stakeholders in Cork City and County.

Energy security and grid capacity are growing concerns for many in the business community and, indeed, those looking to invest in Ireland.

We have a once-in-a-generation opportunity at present to integrate our economic development with our sustainability and environmental goals. It is vital that we act to maintain and drive economic growth in Ireland, while prioritising future-proof development insofar as possible.

This ten-year network development plan strategy maps out future gas supply and demand in Ireland, and identifies the system operations upgrades and capital investment that may be required over the next decade. This future-looking document is designed to assess the network to ensure gas continues to flow to customers and to maintain the security of supply.

In doing this, a low-carbon future needs to also be a key component of the strategy to ensure that Ireland can meet its climate targets.

Yours Sincerely,



Conor Healy
CEO

Risks to the network

The network development plan highlights that Ireland's transmission system is forecasted to have sufficient capacity to meet future gas flow requirements over the next decade, subject to the successful completion of capacity upgrade works at both compressor stations in Scotland, Brighthouse Bay and Beattock.

While this is welcome news, it highlights the importance of adding extra capacity and contingencies in other parts of the network where appropriate to ensure that we are not wholly reliant on imported gas, in particular in times of high demand.

Gas Networks Ireland reported a significant decrease in gas demand in February 2025 due to milder temperatures and strong wind energy generation.¹ However, previous months had witnessed increased reliance on gas due to lower levels of wind generation and sub-zero temperatures. In the context of climate change and the potential for future levels of unpredictable weather, gas retains a pivotal role as a reliable back up when wind generation declines or in the case of extreme weather events.

In addition, it is noted that the network may also face pressure in a situation where there is a growth in "islanded" large-energy users (LEUs), referring to data centres which connect only to the gas network and not the electricity grid. Recent figures demonstrate that the share of electricity consumed by data centres in Ireland has risen steadily in recent years, from 5% of national demand in 2015 to 21% by 2023.² An increase of 20% between 2022 and 2023 is particularly notable, highlighting the rapid growth of this industry in Ireland and the importance of future planning for further development.

Data centres play a critical role in underpinning many elements of our economy and our everyday lives, providing for ICT services that we have come to rely on in so many sectors. In all likelihood and with the advent of AI, the number of data centres is only going to increase. In this regard, it is vital that clear guidelines are established with regard to the connection of new data centres and their back-up energy sources, whether this is in terms of connections to the electricity grid, the gas network, or self-generation. This provides opportunities for renewable fuel sources, such as green hydrogen and biomethane.

A coordinated approach is needed for connections to the electricity and gas networks to ensure that policies introduced for electricity do not inadvertently result in an unintended consequence of increased connections to the gas network, and vice-versa. System constraints and capacity issues should be considered in this regard and balanced with the importance of ensuring security of supply.

An influx of LEUs in the form of 'islanded data centres' could exert significant pressure on the gas network, thereby increasing the urgency of investment in our gas infrastructure to meet this increased demand. Although the plans of some islanded gas LEUs to migrate into the electricity system once it can facilitate new connections should be considered in this regard, these LEUs should continue to be considered islanded LEUs for the purpose of planning in the immediate term and in the context of this proposed decision on new connection policy.

¹ Gas Networks Ireland, <https://www.gasnetworks.ie/corporate/news/active-news-articles/gas-demand-feb25/>

² CSO, [Data Centres Metered Electricity Consumption 2023](#)

A balance needs to be found to ensure that these LEUs can continue to function and that new LEUs may be developed too but in a manner which does not compromise the energy grid or the security of gas supplies.

Energy grid and demand

Ireland has immense potential to grow its domestic renewable energy sector, an opportunity which presents significant economic opportunities for the country.

In our general election manifesto, Cork Chamber called on the government to reinforce and build out Ireland's electricity grid as a national priority to support a growing supply from renewables and meet increasing electricity demand. Currently, the grid suffers from capacity constraints, which impedes housing and infrastructure development that might lead to increased electricity demand.

In recent weeks and months, this situation has become even more acute and must be addressed as a matter of priority.

The All-Island Resource Adequacy Assessment 2025-2034, published by Eirgrid, identifies the important role that new gas capacity will play in securing supply.³ It also concludes that the electricity industry will need to find new ways to meet increasing demand for energy without relying on burning fossil fuels.

Cork Chamber encourages the CRU, Gas Networks Ireland, and other stakeholders to engage with Eirgrid and the relevant government departments to accelerate this process to ensure that it is possible to move toward a lower carbon future.

Furthermore, Cork Chamber also urges the government to allocate support to initiatives like Gas Networks Ireland's Pathway to a Net Zero Carbon Network plan by developing energy transportation infrastructure and upgrading the grid, as well as repurposing existing infrastructure for new uses, such as green hydrogen.

Recent data published by Gas Networks Ireland shows that 22% of Ireland's gas came from the Corrib gas field and the Moffat Entry Point was responsible for 78%. Biomethane provided for less than 0.1% of demand in 2023/24, a total of just 48GWh.⁴

This data shows an enormous opportunity for Ireland to increase its use of renewable gases, in particular biomethane and green hydrogen.

Emissions and decarbonisation

Gas Networks Ireland has mapped out its plans for decarbonisation in Pathway to a Net Zero Carbon Network.⁵ This strategy highlights the essential role the national gas network will play in transitioning Ireland to a carbon-neutral economy by 2050 and targets the development of a fully decarbonised gas network by 2045, ensuring a secure and reliable energy supply.

³ Eirgrid All-Island Resource Adequacy Assessment 2025-2034, <https://cms.eirgrid.ie/sites/default/files/publications/AIRAA-2025-2034.pdf>

⁴ Gas Networks Ireland, <https://www.gasnetworks.ie/corporate/news/active-news-articles/gas-demand-2024/>

⁵ Gas Networks Ireland, <https://www.gasnetworks.ie/pathway-net-zero/>

At Cork Chamber, our direction is guided by a formal pledge to uphold the United Nations Sustainable Development Goals (SDG). Five of these have been identified as priorities by the Chambers Ireland network, including Goal 11 – Sustainable Cities and Communities, and Goal 13 – Climate Action.

All of our policy outputs are guided by these goals, which include a focus on renewables and energy system integration and climate neutral cities.

In this sense, we support Gas Networks Ireland and its aim to decarbonise the network in the coming decades and encourage the exploration of ways to achieve this even sooner than its target of 2045.

Essential aspects of this transition to a cleaner and greener system are the increased use of green hydrogen and biomethane, both of which can be supported through the use of targeted operational supports and upgraded infrastructure.

Cork Chamber acknowledges and welcomes steps already taken in this space, including the construction of a central grid injection facility in Mitchelstown, which will enable biomethane to be injected directly into the gas network. This project should be used as a template for similar facilities elsewhere in the country to allow for the rapid rollout of biomethane throughout the network.

The Programme for Government⁶ includes plans for financial incentives for biomethane producers, reinforcing the commitment to development a sustainable renewable gas sector, and Cork Chamber encourages all parties to work together on this as a priority to accelerate and increase the decarbonisation of the network as soon as possible.

Similarly, the increased use of renewable compressed natural gas (BioCNG) in the transport sector is welcome. Commercial transport is responsible for up to 20% of Ireland's carbon emissions and BioCNG represents a viable and sustainable solution for the commercial road transport sector, where electric alternatives are not yet feasible. The opening of Ireland's first dedicated BioCNG refuelling stations in 2024 was a major step forward in this sector, offering a carbon neutral option for Ireland's haulage industry.

Cork Chamber would encourage and support the further rollout of BioCNG refuelling stations throughout the road network.

Conclusion

Cork Chamber welcomes the opportunity to contribute to the public consultation on the Gas Networks Ireland Ten Year Network Development Plan 2024 by the Commission for Regulation of Utilities (CRU).

It is clear that the gas network continues to play an important role as a source of electricity, including its role as a reliable back up in times of low wind generation or extreme weather. However, there is also an opportunity to embrace new technologies to decarbonise and modernise the network, utilising greener alternatives like hydrogen, biomethane, and BioCNG.

⁶ Programme for Government, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/318303/2cc6ac77-8487-45dd-9ffe-c08df9f54269.pdf>

In addition, it is essential that new, forward-looking strategies such as this establish policies on rapidly developing industries, such as data centres and other large energy users, to ensure that Ireland can retain its position as an attractive place to do business.

In doing so, clear guidelines must be established to ensure that the wider grid is not undermined by increased demand in concentrated areas. Already, Cork Chamber members have raised concerns about grid capacity and energy security and the impact these are having on new developments.

Ensuring security of supply must be paramount in the development plan.

It is also crucial that steps to ensure that Gas Networks Ireland is fully resourced and supported in its decarbonisation process to ensure that Ireland can achieve its ambitious climate targets.