

Fitzgerald House, Summerhill North, Cork, T23 TD90, Ireland. +353 (0)21 450 9044 info@corkchamber.ie CorkChamber.ie

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

11th September 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to contribute to the public consultation on the Commission for Regulation of Utilities' (CRU) Price Review Six proposals regarding the allowed revenues for EirGrid and ESB Networks for the period January 2026 to December 2030, as well as changes, modifications and enhancements to the regulatory framework for the network companies.

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 Climate, Energy and the Environment 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.

Against the current backdrop of increasing geopolitical uncertainties and rapidly approaching climate targets, energy security and the future-proofing of our energy systems to cater for population growth and industrial development in a sustainable manner is a critical priority for Cork Chamber's members, and indeed an essential element of Ireland's continued competitiveness.

The Price Review Six Draft Determination represents a significant increase on capital investment compared to Price Review Five, with €14.1 billion of baseline funding. This funding has the potential to transform Ireland's energy infrastructure, a transformation that will be essential if we are to reach the ambitious climate targets that have been set out at national and EU level.



EirGrid Draft Determination

Maintaining and enhancing Ireland's competitiveness is dependent on the country's ability to ensure the provision of sufficient, affordable housing and other infrastructure required to facilitate investment and talent attraction. Essential too is our ability to chart a course for a green energy future, reducing dependence on non-renewable resources and harnessing the existing potential across on- and offshore wind, solar, hydrogen and other renewable sources of energy.

In this regard, proposals to facilitate the required investment in offshore wind and related infrastructure in Price Review Six, the first Price Review to make provision for the sector, is particularly welcome. For EirGrid to be successful in its function as Offshore Asset Owner (OAO), clear planning, adequate resourcing and industry transparency will be essential. Additional detail and clarity on EirGrid's planning and expectations for the Price Review Six period would be beneficial for developers involved in the sector.

Significant targets have been set for offshore wind by government, with 5GW to be developed by 2030 and further development projected for the years thereafter. It is vital that these targets are matched by significant investment to ensure that Ireland's full offshore wind potential is realised. Further detail on how the CRU expects network companies to demonstrate the alignment of their plans with the Climate Action Plan and specific sectoral targets should also be provided in this regard.

Work is already underway on the development of the South Coast Designated Maritime Area Plan (SC-DMAP), with an auction for the Tonn Nua site set to take place in the autumn and EirGrid's Powering Up Offshore South Coast project to build out transmission grid infrastructure progressing. As Phase 2 projects advance under the SC-DMAP, and with developments in other areas of the coast awaiting the publication of the National DMAP, investment in infrastructure in the south coast is critical to ensure that approaching offshore wind targets are met. Price Review Six's draft determination of €347.9 million in CapEx to facilitate the development of the Tonn Nua site, in line with EirGrid's requested funding, is welcome in this regard.

Cork has immense potential to become the first of the national hubs for the offshore wind sector, with the Port of Cork undertaking a considerable expansion to ensure readiness for offshore wind, alongside the industry stakeholders, research facilities and other infrastructure all present in the region already. Investing in the further development of offshore capacity in the region will play an important role in realising the economic and societal benefits of renewable energy for Ireland as a whole. While new infrastructure is vital, it is important too that existing assets are utilised efficiently and innovatively to support the achievement of targets in a timely manner.

In 2024, Cork Chamber established the Cork Offshore Renewable Industry Forum (CORIF), bringing together key industry representatives in the sector to advocate for the

policy and infrastructure enablers that will ensure the realisation of our offshore wind targets, and the related benefits for the Cork region and for Ireland.

ESB Networks Draft Determination

In tandem with investment in offshore wind, ensuring network readiness to support increased renewables capacity is vital. Price Review Six's provision for scaling up capacity in ESB Networks is welcome in this regard. Enhanced network capacity is critical to Ireland's competitiveness, particularly if this increased capacity can be realised in a sustainable manner. To support the efficient integration of renewables, it is critical that the grid is digitally enabled and smart to support the flexibility this requires. Addressing the impact of dispatch down is also vital, as this remains a barrier to renewables integration and the achievement of climate targets.

Increased allowances for ESB Networks to build transmission capacity in order to facilitate housing, industrial and other developments are also critical. Ensuring the readiness of the network to accommodate the housing development projected under current housing targets, as well as future-proofing to allow for housing development to be scaled up as necessary, is vital. The draft determination's provision for upwards of 250,000 new housing connections is welcome in this regard.

Ensuring sufficient housing supply is key to Ireland's ability to attract talent and investment across the country, and remains a pressing concern for Cork Chamber members. Between 7,500 and 10,000 new housing units are needed per year in the Cork region to keep pace with population growth and housing demand. Alignment between the providers of critical utilities, such as ESB Networks, local authorities, developers and other key stakeholders must be prioritised to ensure housing development progresses in a timely manner, and that available zoned lands for housing can be developed rapidly.

As the impacts of climate change become more pronounced, enhancing the resilience of the network to manage increasingly extreme weather events and their potential for disruption will also be important, and Price Review Six's recognition of this growing priority area is welcome. Growing recognition of the importance of climate change mitigation, both in government policy and among the public, will also result in increased electrification across many sectors, placing additional strain on the electricity network. Provisions for building capacity to support additional electric vehicles, as well as the electrification of public transport, is particularly important in this regard.

Both Cork and Dublin are participating in the EU Climate-Neutral and Smart Cities Mission to 2030, and large-scale electrification of public transport and other high emissions sectors will have a pivotal role to play in work towards the target of climate neutrality in the coming years.

Conclusion

While it is clear that significant investment is required for both EirGrid and ESB Networks to enhance capacity and future-proof operations, it is vital that the financial impact on customers is minimised insofar as possible. The CRU's commitment to reducing costs where possible and delivering better outcomes for consumers is welcome in this regard. Many customers, both commercial and domestic, have faced increased utilities costs in recent years, with Irish households subject to some of the highest electricity costs in Europe.¹

In delivering better outcomes for consumers, it is vital that the CRU, EirGrid and ESB Networks remain cognisant of the potential for price increases for consumers as a result of increased investment and that these potential increases are mitigated where possible. Many SMEs remain particularly vulnerable to the pressures of price increases and should be given particular consideration in the context of any potential cost increases for consumers.

Cork Chamber looks forward to the publication of the CRU's final determination on Price Review Six in December.

Yours sincerely,

Conor Healy

CEO

¹ Eurostat, 'Electricity price statistics'