

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

9th January 2026

Re: Biomethane Connections Policy Review

To whom it concerns,

Cork Chamber welcomes the opportunity to contribute to the Commission for Regulation of Utilities' (CRU) public consultation on the Biomethane Connections Policy Review.

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. At Cork Chamber, our direction is guided by our formal pledge to uphold the UN SDGs, five of which have been identified as priority areas by the Chambers Ireland network. Cork Chamber has also recently been appointed an SDG Ambassador by the Department of Climate, Energy and the Environment.

Our advocacy is shaped by the views and priorities of our partners, and is informed by our continuous engagement with members, our Board and key stakeholders in Cork city and county.

Sustainability and the development of renewable energy are key priority areas for Cork Chamber members and the views outlined below are based on feedback from Chamber members active in the biomethane sector.

Biomethane is a proven, carbon-neutral energy source already integrated into Ireland's gas network, and its strategic role and potential for growth in Ireland has been recognised both nationally and at EU level. To unlock its full potential, however, further certainty from government is needed to ensure sustained funding mechanisms that support infrastructure development and market growth. The implementation of the Renewable Heat Obligation is also important in this regard.

Building on the publication of the National Biomethane Strategy in 2024, continued policy development and investment in the sector is critical to ensure its full potential is reached and the sector is supported to scale in a sustainable manner. Given the evolution of the sector in recent years, as well as the established delivery target of 5.7TWh of indigenously produced

biomethane by 2030, the CRU's review of the Biomethane Connections Policy is an important and timely intervention.

In order to reach the target of 5.7TWh, the biomethane industry will be required to develop at scale in the coming years. With this in mind, supporting and facilitating investment in the sector insofar as possible should be prioritised in the revised connections policy. With regard to the proposal to extend the appraisal period for the economic test from 10 to 15 years, this would be a welcome extension, recognising the longer life and slower ramp up of biomethane facilities. It would also improve economic viability by spreading connection cost recovery over a longer term and is aligned with international best practice.

However, the proposal to set financial security requirements based on 70% of injection volumes to break even under the economic test could result in higher and longer-lasting security obligations for producers, which could potentially act as a deterrent to potential investors. The retention of a time-based model or the introduction of a transitional approach could be considered as alternatives to encourage investment as the sector continues to develop, while also recognising the value of potentially transitioning to a model similar to the proposed in the future to strengthen consumer protections as the sector becomes more developed.

With regard to the proposed connection charges for Mitchelstown CGI, harmonising CGI charging with direct connections should be considered to promote fairness across connection types. Producers located further from the network should be afforded the opportunity to participate on a level playing field, supporting multi-user shared infrastructure and allowing for scaling biomethane volumes into the grid. A potential model could include: 30% of capital costs paid by CGI users, with the remaining 70% socialised on Gas Networks Ireland's (GNI) Regulatory Asset Base (RAB) and secured through financial security.

In conclusion, the development of a revised biomethane connections policy is a welcome step forward to support the long-term growth and development of the sector as national and EU climate targets approach. However, it is critical that further clarity is provided regarding the impact on already contracted customers to minimise uncertainty for existing projects.

Continued engagement with potential developers should be prioritised to ensure policy remains aligned to the evolution of the sector, and investment is facilitated insofar as possible ahead of 2030.

Yours sincerely,



Conor Healy

CEO