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Commission for Regulation of Utilities,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 024 PXWO.

15th December, 2017

Dear CRU,

Shannon LNG Ltd appreciates the opportunity to respond to consultation CRU/17/309.

We appreciate that the level of applications in the system has reached unmanageable proportions, but we are concerned that the proposed system overlooks one of the key objectives of CER/09/099 which was to promote high-efficiency CHP. In that 2009 decision the CER decided that CHP projects exhibited "... public interest benefits and are therefore preapproved for processing outside the GPA."

EU Directive 2012/27/EU also provides that Member States shall "provide priority or guaranteed access to the grid of electricity from high-efficiency cogeneration".

Ireland has an objective of securing 800 MW of CHP.

In the Shannon LNG CHP case, Shannon LNG holds Strategic Infrastructure Development Planning Approval and High Efficiency Certification for a 500 MW CHP plant. Shannon LNG made a Grid Connection application to Eirgrid. That application – TG228 – is currently listed by Eirgrid as 'on hold'.

Shannon LNG now wishes to progress the LNG terminal project inclusive of the High Efficiency CHP plant and is concerned that the proposed arrangements do not appear to provide for CHP.

Accordingly, we would contend that Grid Connection applications from CHP plants with planning permission and high efficiency certification should continue to be preapproved for processing outside of the new procedures.

Sincerely,

Michael Biggane
for Shannon LNG

Attachment: Confidential Annex