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

10th August 2018

Re: Policy for Electricity Interconnectors - Public Consultation

Dear Sir/Madam,

I am writing with regard to your request for feedback on the Policy for Electricity Interconnectors. Gas Networks Ireland welcomes the consultation and the opportunity to provide feedback on electricity interconnection policy.

Gas Networks Ireland 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 network consists of over 11,000 km of distribution pipelines and almost 2,500 km of transmission pipeline. It supplies energy to 14 power stations, more than 23,000 multi-nationals and businesses and over 654,000 homes. Gas Networks Ireland believes that the gas network is integral to Ireland’s energy system.

Gas Networks Ireland welcomes the broad range of criteria which are required to be considered in the assessment of electricity interconnection applications. In particular Gas Networks Ireland welcomes the following points under the economic criteria:

3. Wider impact on other energy market participants, distributional impacts. e.g. impact on gas networks, gas tariffs and their knock-on impacts on gas consumers and/or I-SEM prices, impacts on other existing and/or potential electricity interconnectors.

7. Potential alternatives to electricity interconnection, e.g. gas interconnection, gas/electricity storage, demand side response, energy efficiency.

In addition the impact on existing gas-fired power plants should be taken into consideration, in particular where additional interconnection results in lower Load Factors.

Gas Networks Ireland has a query about how the overall impact of the electricity interconnector will be assessed and whether a weighting will be applied to each of the criteria as part of the assessment.
If you have any questions or require any clarifications with regard to the above information please let me know.

Yours sincerely,

Gas Networks Ireland