

Dear Sir/Madam

We are making this submission on behalf of Moffash Ltd and Profile Park Power Co. 1 Ltd.

### **Background**

Moffash Ltd are the owners of circa 50 acres of land in Profile Park, Nangor Road, Clondalkin which is located in the heart of a significant data centre hub and is surrounded by the T50 network. Moffash Ltd are collaborating with a number of end users to develop data centres at Profile Park.

Profile Park Power Co. 1 Ltd is a 100% subsidiary of Moffash Ltd. This company was set up to apply for power applications in Profile Park to be used by the end users that Moffash Ltd are collaborating with. They currently are awaiting an offer from Eirgrid. This offer has been submitted in May 2019.

Moffash Ltd have been actively promoting a dispatchable power generation solution for the park users to allow flexible capacity constraints to become fixed based on the existing DCCOP policies. This process has been ongoing for a number of years at this stage.

### **Basis of Submission**

Moffash Ltd fully understands the current situation in relation to security of supply and support a clarification of the policy to cope with the current demands.

We do wish to submit that the proposed prioritisation should also take consideration of the length of time that the applicant has been in the queue for the power offer. We believe this is justified by the fact that customers will have incurred significant cost and effort over the time that they have been waiting for the offer on the basis that the offers had been expected to be issued prior to the current proposed policy direction.

We also would submit that any direction should also direct that Eirgrid provide clarity in relation to the following points:

1. Where the constrained areas are. Can this be detailed on a substation/region basis?
2. If the data centre development is in a constrained area will that rule out the processing of an offer or will it mean that dispatchable generation may be called upon more often.
3. In relation to dispatchable generation:
  - a. How will ability of the data centres to bring on site dispatchable generation or storage be assessed?
  - b. What are the criteria for this assessment?
  - c. What are the technical requirements which may be specified by EirGrid?
  - d. How will this dispatchable generation be connected to the transmission grid and can it be connected behind the meter?
  - e. Will EirGrid write to developers to advise their requirements and to request this information.
4. Will EirGrid provide guidance to specific data centre applicants around the likely frequency and durations of requests to reduce demand or provide dispatchable generation?

5. Will capacity payments be made in the case where generation is made available to support the grid?

Yours Faithfully

Michael Treanor