

West Tyrone Against Wind Turbines
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BT79 7SX
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Commission for Regulation of Utilities
The Grain House
The Exchange
Belgard Square North
Tallaght
Dublin 24, D24 PXW0
Ireland

Ref: Public Consultation. CRU proposed Direction to the System Operators related to Data Centre grid connection.

To whom it may concern.

The System Operator for Northern Ireland (SONI) is owned and controlled by Eirgrid.

Northern Ireland Electricity Networks is parented by ESB, also a semi-state company.

There is ample evidence that the cost of added infrastructure to accommodate global scale companies with data centres is being met by tax and electricity bill payers from both jurisdictions.

This should therefore be an all-island consultation.

Before this can take place there is a pressing requirement for explanations to a number of issues:

1. The absence of a cost benefit analysis of the over-arching project of installation of so-called renewable generation and related infrastructure in both NI and the ROI.
2. The failure to meaningfully assess the health impacts of these generators.
3. The failure to acknowledge the impact of off-shore wind industrial estates and associated generation of infrasound on marine life.
4. The failure to assess the environmental impact wholly associated with the over-arching renewables project including the following:
 - a. The acidic and radioactive pollution downstream from the mining and processing plants for the large amounts of rare earth metals and other required elements.
 - b. Habitat and bog destruction caused by the above and other installation activities for example, massive landslides in Galway and Donegal and on a smaller scale Lough Lea near Castledearg.
 - c. The use of slavery for production in Africa (cobalt mining carried out by child slaves) and China's Uyghur slaves in solar panel production.
5. The reason Irish tax payers have contributed heavily to plant and infrastructure that is installed in Northern Ireland without planning permission, therefore at risk, for example, the Mullavilly Battery Energy Storage System.

6. The failure to apply the Seveso Directive legislation to Battery Energy Storage Systems, therefore risking lives and habitat.
7. The lack of clarity on subsidies and other incentives or so-called compensations related to renewables.
8. Given recent reports from an Irish based media, it would appear there has been little public discussion on the demands of data warehousing along with an eager to please attitude from planning authorities. This has resulted in a looming crisis.
 - a. [Ryan: power supply gap is top priority for government | Business Post](#)
 - b. [Editorial: Our electricity grid crisis has been a long time in the making | Business Post](#)
 - c. [Eirgrid and CRU warn of 'rolling blackouts' if action is not taken on data centre growth | Business Post](#)
 - d. [Power hungry: how Ireland's energy crisis could restrict foreign direct investment | Business Post](#)
9. Clarification is required on generation type, for example 20% from renewables does not reflect 20% less fossil fuels consumed nor the amount wasted to provide backup or base load to cater for unstable wind and solar energy.
10. The obfuscation needs to cease of the selfish interests of those who can influence or create legislation on the use of renewables. Transparency and integrity are essential for trusted governance.

Given the increased use of SF6 to service the massively increased amount of infrastructure, the carbon and pollutant costs of manufacture and installation; ecological damage has been increased without meaningful achievement.

[Climate change: Electrical industry's 'dirty secret' boosts warming - BBC News](#)

We believe energy legislators should reflect on a straightforward publication by Pat Swords before proceeding. It can be freely downloaded from the following web-site:

[Feedback from: Pat Swords \(europa.eu\)](#)

The CRU has opened with the following sentence:

"The CRU is seeking, through the proposed direction, to protect electricity consumers and Security of Supply while continuing to connect data centres to the electricity system."

We find this statement by the CRU very contradictory.

You can't have both.

The only way to "protect electricity consumers and Security of Supply" is **not to accommodate the huge energy demands of data centres.**

To accommodate data centres will result in increasing grid infrastructure which will industrialise our beautiful landscape on an all-island basis, inflate energy prices which will increase fuel poverty, jeopardise jobs especially in the manufacturing sector and will threaten our Security of Supply leading to blackouts which will negatively impact on public health and safety, homes, businesses and public service providers who depend on the use of electricity to function.

The citizens of Texas recently experienced the harsh reality, including the loss of life last winter, due to a Government Policy of over ambitious renewable energy targets and accommodating data centres which don't work when the demand for electricity is at its highest, usually in freezing winter weather conditions.

We should learn from the tragic mistakes of others who have gone down this road before.

We don't want the people of Ireland, North or South, to experience the same consequences.

Prevention is better than cure.

The price is too much, for so many, for so few.

We respectfully request acknowledgment of this submission.

Yours sincerely,

Owen McMullan

Chairman

West Tyrone Against Wind Turbines