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An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities
The Exchange
Belgard Square North
Tallaght
Dublin 24, Ireland

Thank you very much for opening this consultation on Data Centre grid connectivity. In August of 2019, Nautilus was granted planning permission for a small data centre at the Ted Russell dock in Limerick which will showcase our innovative approach to data centre cooling that improves energy efficiency by as much as 70% over traditional solutions and eliminates the consumption of drinking water and associated energy use, production of wastewater and associated energy use, and the use of greenhouse gas refrigerants. We are invested in the outcome of this consultation and the impact it may have on our current and future plans in Ireland. Multiple countries and jurisdictions are struggling with the challenges of data centre power demand and sustainability, and how to align the projected demand growth with best outcomes for their citizens. We believe that should Ireland establish a balanced, forward-looking approach, based upon the proposed Option 3, it will become a model for other countries and regions.

Nautilus believes that either doing nothing (Option 1) or placing a moratorium on data centre connections (Option 2) are not the best way forward and agrees with the CRU position that Option 3 is a balanced and proportionate course of action. The third option proposes an Ireland-wide data centre connection prioritisation scheme that emphasises closer cooperation with the TSO, more flexible data centre demand, and onsite generation to better support the needs of the entire Irish electricity system. Nautilus fully supports all four prioritisation criteria, but we would add three additional criteria to further protect the public interest:

1. The energy efficiency of the data centre as measured by an industry standard metric such as Power Usage Effectiveness (PUE);
2. The overall impact on the public drinking water and wastewater treatment infrastructure as measured by the proposed volume of water consumed and expected wastewater discharge, both of which have environmental and societal impacts in addition to their significant electricity use to pump and process the water;

3. In unconstrained regions of the electricity system provide an allowance for small data centres that require less than 10MVA of electricity in any single campus for accelerated connection review and approval.

The addition of criteria that incentivises efficient, sustainable, and regionally focused data centres would enhance the proposed criteria in Option 3 and help secure the long-term reliability of the electricity system in Ireland.

Thank you again for the opportunity to contribute to this consultation and we look forward to a process that moves Ireland to the forefront of a sustainable power future.

Sincerely,

Patrick Quirk
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