



COMHAIRLE | CLARE  
CONTAE AN CHLÁIR | COUNTY COUNCIL

The Commission for the Regulation of Utilities,  
P.O. Box 11934,  
Dublin 24.

7<sup>th</sup> July 2021

**Re: CRU Consultation Paper - CRU/21/060**

A Chara,

I refer to the above Consultation Paper on CRU proposed direction to Systems Operators related to Data Centres grid connection and I wish to make the following observations on behalf of Clare County Council. The Council understands the rationale behind the proposed Direction letter and the need to ensure the stability of the power transmission and service networks nationwide.

In general, the Council supports the specifics of the proposed Direction relating to the location within a constrained or unconstrained region of the electricity system, the ability of each data centre applicant to bring on site dispatchable generation (and/or storage) equal to or greater than their demand, the ability of each data centre applicant to provide flexibility in their demand by reducing consumption when requested to do so by the TSO.

It does, however, wish to make a number of suggestions: –

1. Some account should be taken of whether a specific site for data-centre development has been identified within the Development Plan of the Planning Authority. Where the development of one or more data centres has been identified as a strategic objective in a Development Plan and land has been set aside for that purpose, it should be clear that such a policy and designation should have an impact on prioritisation. If such an approach is not taken, it will become impossible for a Planning Authority to take a strategic approach to the development of data centres with any level of confidence and the context for engaging with potential developers of such data centres will become very tenuous. Such a situation would fly in the face of current Government economic development promotion policy.
2. It is not fully clear from the proposed Direction what is meant by the phrase “apply the above prioritisation”. Does this mean that the four factors in question should be taken into account as a totality or does it mean that each criterion is a separate test to be met? If the former, then Eirgrid and the ESBN can make an assessment taking all factors into account and balancing one against another or assessing their combined effect; if the latter, then, for example, a proposal within a constrained region would not be considered whereas a proposal within an unconstrained region would.

**An Stiúirthóireacht Forbairt Gheilleagrach**

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

**Economic Development Directorate**

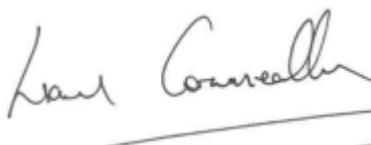
Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

3. It is suggested that the criterion which is stated as “the ability of each data centre applicant to bring on site dispatchable generation (and/or storage) equal to or greater than their demand” is excessive in its extent. It seems to propose that no account can be taken of a case where an applicant is bringing on site a significant dispatchable generation and/or storage which is, however, less than their demand. It is suggested that this be amended to “the extent of the dispatchable generation (and/or storage) which each data centre applicant proposes to bring on site relative to their demand”. It is also important that in unconstrained areas grid connection be provided based on the capacities available and offers made.
4. The Council is also of the view that account be taken of the proximity of a proposed data centre site to a high-voltage transmission and distribution network.
5. Account should be taken of the capacity of a Local Authority area to generate electricity from renewable resources and the extent to which the planning policies of that area provide support for such generation (as set out in the statutory County Development Plan).
6. Also, account should be taken of projects which have been approved for renewable energy generation within the County in which the proposed Data Centre is located.
7. The Council acknowledges the need to ensure continued security of electricity supply while supporting the growth in renewable electricity generation from wind and solar energy and in this regard has proactive policies supporting the many renewable energy projects in Co. Clare.
8. New conventional generation capacity is most likely to be natural gas-fired (transitioning in time to green, grey or blue hydrogen) – primarily to replace peat, coal and oil-fired generation capacity that are being phased out over the coming years. While this new generation capacity will be reliant on natural gas, it will only run when needed – for instance during times of low wind in both on and off-shore situations and again its primary function should be to support the operation of the electricity system and ensure security of supply.
9. Data Centre projects at planning or pre-planning stages should be given status in the proposed Direction in particular in unconstrained locations with a firm access to power.

It should be acknowledged that the existing and proposed growth of renewable energy generation in Co. Clare and off the Clare coast responding to significant demand growth and the retirement of existing generating stations shows the leadership position that we have taken in the supply of renewable energy to the grid.

This Council respectfully requests that you take the above points into consideration before a Direction is issued.

Is Mise, le Meas,



**Liam Conneally**  
**Director of Service**