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Electricity Policy Division,
Department of Communications, Climate Action and Environment,
29-31 Adelaide Road,
Dublin,
D02 X285.

2nd March

Re: Draft National Policy on Electricity Interconnection in Ireland - Public Consultation

Dear Sir/Madam,

I am writing with regard to the department's request for feedback on its Public Consultation on Draft Interconnection Policy. 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 647,000 homes. Gas Networks Ireland believes that the gas network is integral to Ireland's energy system.

The national policy, role of the regulator and scope of the draft policy on electricity interconnection are set out clearly in the consultation document. Gas Networks Ireland agrees that electricity interconnection proposals should be underpinned by a variety of evidence and the document outlines a reasonably broad range of items that should be included. Gas Networks Ireland believes that while electricity interconnection policy will have a significant impact on the operation of the electricity network and market, it will also have an impact on the gas network and the broader energy market which should be considered.

Gas Networks Ireland requests that the impact on existing gas-fired power plants is explicitly taken into consideration, in particular where additional interconnection results in lower Load Factors. In addition, the potential impact on gas demand and on utilisation of the gas network due to electricity being imported rather than generated should be considered.

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If you have any questions or require any clarifications with regard to the above information please let me know.

Yours sincerely,

[Redacted signature]

[Redacted line]

[Redacted line]

Gas Networks Ireland

[Redacted names]