

From: [REDACTED]
Sent: Friday 28 October 2022 16:11
To: Energy Consultation
Subject: Energy Consultation Submission

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Hi,

Please find below my submission to the consultation "**Review of the security of energy supply of Ireland's electricity and natural gas systems**". I am a member of Friends of the Earth and we feel that it is essential that Ireland makes a fast, rapid and just transition to a fossil free energy system. This is the best way to ensure our energy security and tackle the climate and energy poverty crises. I include more specific detail on how I believe Ireland should address energy security issues below.

Zero-carbon electricity by 2035

The independent expert report clarifies the positive contribution that can be made from energy efficiency, offshore wind, solar, battery storage and further interconnection. These must be prioritised in any planning related to energy security and energy infrastructure in Ireland. We cannot continue dependence on dirty, expensive and unreliable fossil fuels - this will only lead to further insecurity down the line, as well as continued damage to our environment. The state has the technologies and the resources to protect and decarbonise our electricity system. The Government must choose to use them.

Energy security and climate security

Any planned energy security infrastructure must align with Ireland's climate obligations. This means proposed infrastructure must include:

- An assessment of emissions associated with the project and how it aligns with Ireland's carbon budgets and associated sectoral emissions ceilings.
- Full information on how it will support full decarbonisation of the energy system by the 2030s in accordance with Ireland's target of net zero emissions before 2050.
- An examination of impacts on the environment and health.
- Full information on how the infrastructure will be used (e.g. only in an emergency) and how it will be phased out (e.g. in order to prevent undue reliance on backup infrastructure / align with zero emissions).

Liquefied Natural Gas:

We need to make the current moratorium on LNG and fracked gas imports permanent through legislation.

The independent expert report for this consultation makes clear that commercially operated or state-owned LNG import terminal on land, such as Shannon LNG, should not be supported as it would like result in the importation of fracked gas and high emissions and there's no guarantee volumes would be sufficient to cover a security of supply shock. I don't agree with any use of LNGs either on or off-shore for this country and request that the government ensure this is avoided - although we have gas supply from the UK there is not a strong enough suggestion that the security of the supply is at extreme threat, and we should be moving away from gas use in general as much as possible.

Fossil Fuel Exploration

The independent expert report makes clear that additional gas reserves from existing exploration licences, such as from Providence or Corrib should not be supported as "[a]dditional domestic production of natural gas could lock Ireland into a high-gas energy market...Unknown volume of any potential additional natural gas discoveries." I don't believe there is a need for existing licenses for gas exploration to continue as Ireland has already agreed to no new gas supplies as well as decarbonisation and a move to net-zero emissions.

Data Centres

Electricity demand in Ireland is increasing exponentially, particularly due to data centres. It would be deeply problematic to allow this demand to continue to increase without restriction. It is unacceptable, from both a moral and policy perspective, for data centres to continue to be approved and connected while households and smaller businesses are being asked to reduce their demand over the coming winter and beyond due to the gas crisis. The UCC MaREI research centre has highlighted a pause in the connection of new data centres as the most impactful single action the Government can take to reduce electricity demand. Gas demand projections are also not in accordance with climate targets so this will need to be reassessed.

Energy Security at Household Level

A) Energy efficiency is energy security:

The Government must focus on energy efficiency solutions as they will permanently enhance our security, reduce emissions and protect households from rising energy costs. As the International Energy Agency has highlighted, the most secure gas molecule is the one you do not need.

Households and communities must be supported. The Government should insulate 100,000 homes in 2023, prioritising measures that save energy and money quickly. The focus must be on reaching those most at risk of energy poverty or insecurity, particularly those who rely on coal and turf. Raise awareness, but don't wait for them to apply to SEAI for a grant, sit down with anti-poverty and community groups to plan a coordinated outreach campaign in relevant areas.

B) Phase out polluting boilers and the gas distribution network:

Installing fossil fuel boilers into the homes of low-income families risks locking them into fossil fuel heating for many years, leaving them vulnerable to global shocks like the current energy crisis. The SEAI have also noted 'a timeline and plan for fossil-fuel phase-out must urgently be put in place if we are to reach net zero by 2050'.

- **Ban the further expansion of the gas distribution network from 2023 through legislation.**

- Ban fossil fuel boilers in new buildings in 2023. Ban the sale of new fossil gas boilers for any building by 2028. Phase out fossil fuel boilers in existing buildings, prioritising residential homes by 2033. These measures must be backed by improved access to energy efficiency measures and alternative zero-carbon heating options.

C) Lead the renewables transformation:

Government should prioritise the rollout of solar PV on the rooftop of every school by 2025 and on the rooftop of 1 million homes by 2030.

UCC MaREI research indicates that more than 1 million homes in Ireland have roof space and orientation suitable for 10 solar panels. This action would produce 25% of all residential electricity demand and would contribute to a culture change around the energy transition where citizens are involved.

Ireland also has potential to increase onshore and offshore wind energy - this should be a priority of the government in relation to securing more energy for home and export.

Loss and Damage Finance Fund

As well as energy security at home we need to consider the effects of climate change on energy security in other countries and make provision for a loss and damage fund to cover losses through climate change disasters in developing countries, caused by emissions produced here.

I hope you will consider these points when making plans related to energy security and infrastructure.

Kind regards,

