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To: energyconsultation@decc.gov.ie

Re: Review of the security of energy supply of Ireland's electricity and natural gas systems consultation

To: Wholesale Electricity and Gas Policy Division

Department of the Environment, Climate and Communications

29-31 Adelaide Road

Dublin 2

D02 X285

We, the undersigned organisations, are making this joint submission as part of the public consultation process for the "Review of the security of energy supply of Ireland's electricity and natural gas systems" as published by the Department of the Environment, Climate, and Communications. Ireland's energy system is going through transformational changes and we must ensure pathways of decarbonisation are prioritised as we transition to a zero emissions energy system. This must be done in a fair manner in pursuit of equality and the eradication of poverty. Here are the five points for our submission.

I. Ireland's climate commitments must be prioritised

We support and maintain the review's assessment that Ireleand needs to rapidly reduce its emissions to fulfil its decarbonisation goals. In order to meet our domestic and international climate commitments, Ireland must not build out new fossil fuel infrastructure or new data centres, which will dramatically increase Ireland's energy use. Ireland must urgently focus on sustainable options such as offshore wind, solar, energy efficiency, district heating, and air-sourced heat pumps.

Just as the review rightly asserts that there is not a need for commercial LNG, it should also assert the facts that there is no need for more commercial data centres and the energy security risks they pose to Ireland.

The Irish Government must put in place a moratorium on new data centres. Existing data centres must also be legislated to stop running fossil fuel generators on-site and instead transition to sources of renewable and clean energy technologies.

Furthermore, the expansion of data centres in Ireland contributes massively to energy security risks: In 2020, the Sustainable Energy Authority of Ireland (SEAI) reported that the most significant driver of Ireland's anticipated energy demand increase is the expected growth of data centres, which can have demand levels comparable to those of large towns. Thus, the construction of new data centres is in direct opposition to Ireland's climate emissions reduction goals set forth by its Climate Action Plan. This is supported by a recent study published by the International Institute for Sustainable Development (IISD) that consolidates overwhelming consensus across all published studies regarding new developments supported by oil and gas, and renders them "incompatible" with the Paris Agreement's target of limiting global warming to 1.5C.

We are extremely concerned that the review report assumes that the data centre industry will continue rapidly expanding, resulting in significantly increased gas and electricity demand, again the final report must assert that there is no need for commercial data centres and that they pose significant energy risks to Ireland.

V. The review must support household energy efficiency and community owned renewable energy and storage.

The energy security review report fails to properly address energy security needs and opportunities at household and community level. Ireland needs to support increased energy efficiency, solar PV and community owned renewable energy and storage, as energy security measures. EU initiatives on "renewable energy communities" run by cooperatives need to be supported in Ireland. Major barriers in place for such initiatives in terms of grid connection; thus, ESB networks need to be mandated to actively support them. Investment in clean-energy infrastructure must be prioritised ahead of fossil fuel development if we are to meet our climate commitments. Communities must be resourced, facilitated and empowered to be involved in co-creating the energy security in Ireland.

In closing, there is no energy security without climate security. Climate obligations and risks of carbon lock-in must be factored into this review. The final Government decisions on the review must propose innovative solutions to upgrade the electricity grid with community-owned and generated renewable energy. Further, it must consider all relevant evidence that suggests the development of private commercial data centres would drive up Irish energy usage, rendering them an overall energy security threat. Ireland has the opportunity to lead Europe and the world in renewable energy and on climate action.

Sincerely,