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From: [REDACTED]

Sent: Friday 28 October 2022 15:53

To: Energy Consultation

Subject: Submission to consultation on energy security

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Dear Dept of Environment,

Please find below my submission to the consultation "Review of the security of energy supply of Ireland's electricity and natural gas systems".

***A headline point I wish to make relates to this week's findings published by the UN environment agency which states the world is coming "very, very close to irreversible changes...time is really running out very, very fast" and that there is "no credible pathway to 1.5C (maximum global temperature rise) in place". These statements alone (and notwithstanding they are only the latest dire warnings from the scientific community) would surely make it essential that the boldest actions to reduce greenhouse gas emissions be taken, even in the face of resistance by and restrictions upon the populace, in order to try to attain this goal or its closest approximation.

As you will see I support Friends of the Earth and this submission is in consort with their general text. I have added other specific comments of my own at the end of the submission.

It is essential that Ireland makes a fast, rapid and just transition to a fossil free energy system as 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.

ISSUE ONE: There's no energy security without 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 first two carbon budgets to 2030 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 by 2050 at the latest.
- An examination of health and environmental impacts
- 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).

ISSUE TWO: Say No to Liquefied Natural Gas:

Make the current moratorium on LNG and fracked gas imports permanent through legislation.

The independent expert report makes clear that commercially-operated or state-owned LNG import terminal on land, such as Shannon LNG, should not be supported as it would most likely result in the importation of fracked gas, it would have high emissions and there's no guarantee volumes would be sufficient to cover a security of supply shock.

ISSUE THREE: Take steps to end current licences for 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.”

ISSUE FOUR: Introduce a moratorium on new data centres connecting to the electricity grid until electricity system pressures and gas lock-in risks are transparently and comprehensively addressed.

The assumption that electricity demand, particularly due to data centres, is allowed to continue to expand is deeply problematic. 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.

ISSUE FIVE: Plan for a zero carbon electricity system 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 instead of continuing dependence on dirty, expensive and unreliable fossil fuels.

The state has the technologies and the resources to protect and decarbonise our electricity system. The Government must choose to use them and not fall back into old ways of thinking.

ISSUE SIX: Support 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 cheaper measures that save energy and money quickly. The focus must be on reaching those most at risk, particularly those who rely on coal and turf. 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.

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 solar transformation:

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

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 at the heart of climate action.

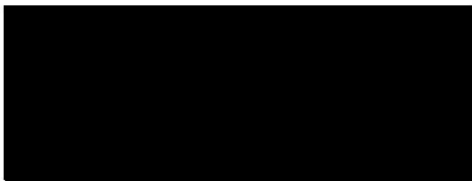
PS to FOE text.

I would stress the paramount need to invest maximally in renewable energy. With the risks of lack of wind, wave or solar being insufficient to provide supply as required I would encourage greatest investiture in development of battery storage and indeed consideration of green hydrogen as support.

Also, in regard to power use by data centres and indeed other large transnational commercial operators I would hope legislation could be put in place so that these operators would be bound by law to provide the ways and means for sustainable energy generation for their own sites - without prejudice to domestic or other smaller local users- as a prerequisite for the approval of future developments.

I would also have concerns that the current hostilities initiated by Russia against Ukraine could escalate into a more widespread theatre of tension or indeed general conflict, potentially extending to coastal waters around Ireland. If this were the case then off shore energy infrastructure projects would be at significant risk of sabotage, made more vulnerable due to Ireland's non membership of NATO.

Yours sincerely,

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