

IRISH MOUNTAIN RUNNING ASSOCIATION

**Submission Regarding Proposed abolition of
seasonal clock changes**



Please protect summer time GMT+1.

Our sport depends on it.



IRISH MOUNTAIN RUNNING ASSOCIATION



Re: Consultation on Seasonal Clock Changes

In Summary:

The Irish Mountain Running Association requests that there be no change to constant winter time. If this change were brought in, our 36 most popular races would be cancelled due to the unacceptable risk posed by reduced daylight hours.

Dear Sir/Madam,

Thank you for the opportunity to submit our views on the above matter.

I am writing on behalf of the Irish Mountain Running Association. We are the representative body for Mountain/Hill running in Ireland. We are a not for profit, entirely volunteer run organisation with 2,909 active members at the time of writing. Our function is to organise mountain/hill runs in the Republic of Ireland. Each year, we organise approximately 110 running events.

In the past year, 36 of our summer races had start times of between 19:00 and 20:00. It is not possible for us to start these races any earlier due to people travelling after work. If we are to lose an hour of daylight in the summer evenings, we would quite simply be unable to host these races without exposing our members to an unacceptable level of risk. These 36 races are by far our most popular with attendance typically in the region of 200- 250 (depending on the numbers allowed by our permits). Our members tell us this is because of challenge, community spirit and the sheer therapy provided by a midweek run in the mountains.

Mountain running is an exhilarating, fun sport that is inclusive to runners of all abilities. We cater for all ages from 10 to 70+. We are a community who work together, with all 2,909 members expected to play a role in the organisation through volunteering. We believe the benefit of our midweek, summer evening races goes far beyond the physical for our members. The mental and social benefits to our members and the camaraderie experienced by them is invaluable in improving quality of life.

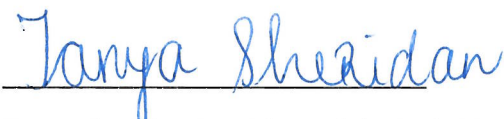
We also bring substantial business to pubs in some of the remoter areas of the country at our prize-givings held after the races.

Our sport, and the community we have built around it are vital to us and we cannot imagine our lives without them.

For the reasons outlined above, we implore you not to introduce constant winter time, so that we can continue with our activities enhancing the lives of our members.

We appreciate your consideration of our views and we are very happy to provide any further information that might be helpful.

Yours sincerely



Tanya Sheridan, President of the Irish Mountain Running Association

Chief Executive's Office

28 November 2018

Our ref: JE/pb

Ms Eileen Leahy
Head of Corporate Services
Department of Justice and Equality
51 St Stephen's Green
Dublin 2

Dear Ms Leahy

I write in response to your letter regarding EU Commission proposals to end seasonal clock changes in 2021. You have asked us for our views on the proposals.

CCEA is an arm's length body of the Department of Education, Northern Ireland. We provide curriculum advice, education assessment and examinations. You can view more information about CCEA at <http://www.ccea.org.uk/>

Should the proposal for seasonal clock change be implemented in the Republic of Ireland and not be implemented in Northern Ireland, then we believe that there may be impact on candidates taking state examinations. The main examinations being impacted would be GCSE (ages 14-16) and GCE/A Level (ages 16-19).

Some candidates live in the Republic of Ireland and travel to Northern Ireland to take their examinations. These examinations are timetabled and there are strict controls regarding timely attendance. A candidate may not be conscious of time differentials that may apply to the start time of examinations. Whilst we, as an examination body, will make endeavours to ensure candidates are aware of potential time differences, the difference would increase the risk of failure to attend an examination in a timely manner and some candidates being disadvantaged.

CCEA does have centres operating in the Republic of Ireland. We would have to advise these centres to open examination papers earlier, to ensure that the assessment is taken at the same time in both jurisdictions. This would be common practise with centres who currently operate within a different time zone. Attending an examination centre at hours where there is reduced daylight may place additional risk where the candidate walks or cycles to the centre.

CCEA would have to update curriculum advice and support material in regards to time and time zones as part of our commitment to the Northern Ireland curriculum.

Yours sincerely



Justin Edwards
Chief Executive

Please find attached a submission to the consultation on Daylight Saving Time.

Regards,

Brendan

(See attached file: dstsubmission.pdf)

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Doing away with DST

Dr Brendan Halpin (brendan.halpin@ul.ie)

29 November 2018

Submission to DST Consultation

I would like to make the following remarks as a submission to the consultation on abolishing Daylight Saving Time.

There seems to be substantial support, in the European Commission and elsewhere, for moving to GMT+1 all year round, but I would like to oppose it. Yes, the twice-yearly switches are inconvenient, particularly the spring one, where we lose rather than gain an hour's sleep. But DST has advantages that outweigh the inconvenience, but may be less apparent: the gains that persist through the seasons stand out less than the transient annoyance of the switches. The key advantage of DST is shipping daylight in the early summer mornings, that most people sleep through, into the evenings, without the penalty of dark winter mornings. Since in winter the daylight hours are less than the active waking day, it is not possible to move light from one part of the day without taking it away from another.

In Ireland Daylight Saving Time means we're on GMT (a little ahead of solar time across the whole country, more so in the west) in the winter, and GMT+1 for the summer. If DST is abolished, we remain on either GMT+0 or GMT+1 for the whole year. I suspect GMT+1 would be favoured, because it keeps us closer to the continent.

Permanent GMT+1

If we change to permanent GMT+1, it will mean dark winter mornings, and correspondingly brighter early evenings, while leaving the summer unchanged with bright late evenings.

Please see Figure 1. The blue line shows the current system, the red is what 12-month GMT+1 would look like, and the green is GMT+0. It shows that GMT+0 (or DST) gives about 3 months in the winter with sunset between about 16:10 and 17:00. This will be 17:10 to 18:00 if we move to GMT+1, which will make the evening rush hour a little brighter. However, the price for that is that for about 80 days of those 3 months, sunrise will be between 09:00 and about 09:45, meaning that for most people the morning commute will be in the dark. At present there are zero days in Dublin (or in almost anywhere else in the country) with sunrise after 09:00.

For comparison, in Helsinki, Europe's most northerly capital, there are currently 50 days a year with sunrise after 09:00. We're looking at a full month more than that in our capital.

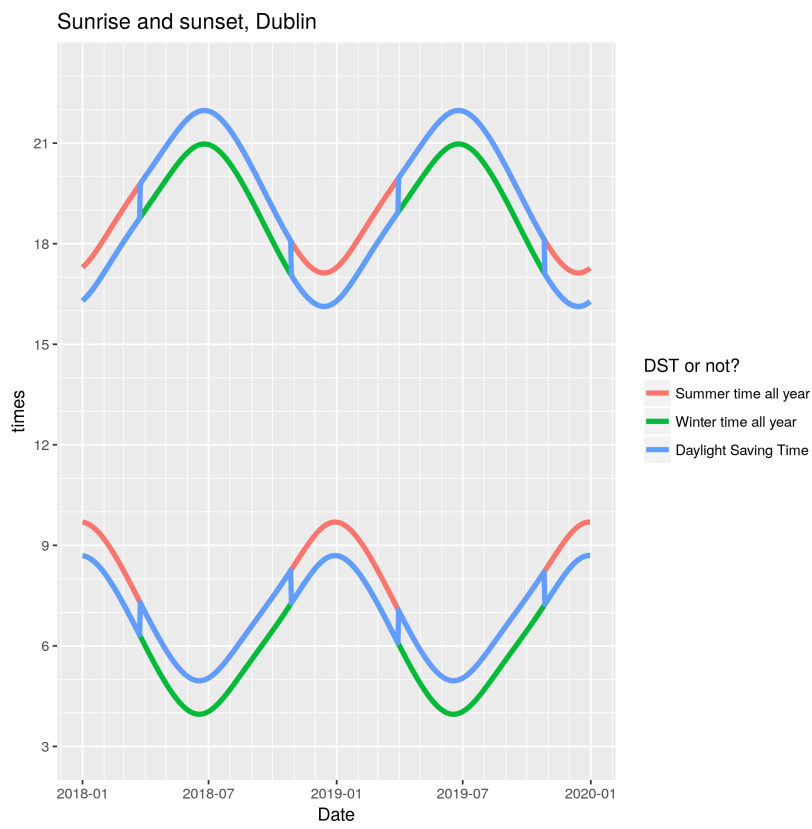


Figure 1: Sunrise and sunset in Dublin, GMT+0 and GMT+1

Dublin is in the east, so it is not typical of the country as a whole. Elsewhere, times will be mostly a little later. For instance, winter sunrise and sunset in Tralee are about 20 minutes later than Dublin.

We can map this pattern over the whole country (see Figure 2). The number of days with sunrise on or after 09:00 varies from 75 in southeastern Wexford to 99 in Belmullet. Here in Limerick we will have about 87 days per year with sunrise after 09:00.

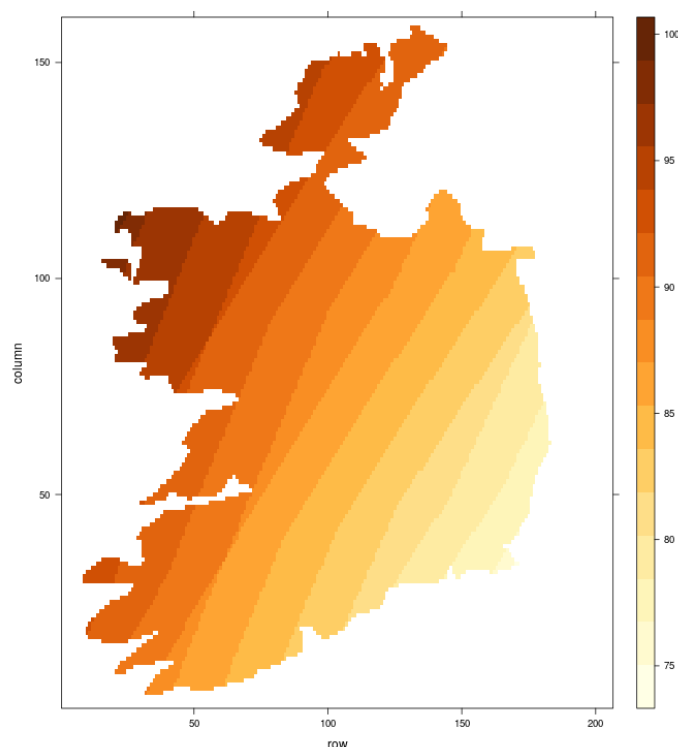


Figure 2: Number of winter days with sunrise after 09:00 under permanent GMT+1

In Table 1 below (source: my calculations based on data from Department of Education, with thanks to Eoin O'Mahony, UCD, for coordinates.), I show what the picture would be like for children going to primary school, counting the number of days with sunrise after 9am, calculated on the coordinates of the school. The extremes are two schools in Wexford with 75, and two in Belmullet with 99 days. But 329 schools in Dublin will have 80 very dark mornings. See also an interactive map, detailing the situation for each primary school individually, at <http://teaching.sociology.ul.ie/dst/primary.html>.

Permanent GMT+0

While permanent GMT+1 would keep us closer to continental time, it puts us a lot further ahead of the sun. We are already quite far west from the Greenwich

Table 1: Primary schools by county: number of days per annum with sunrise after 09:00 under permanent GMT +1

County	<=78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95+
Carlow	21	3	18															
Cavan				7	2	35	9	19	2	2								
Clare							7	10	25	26	34	12	1					
Cork		3	13	48	84	76	35	62	13	7	3							
Donegal												1	3	67	21	54	7	22
Dublin	71	329	40															
Galway								4	23	17	62	16	67	3	25	14		
Kerry									2	41	7	67	5	13				
Kildare		1	65	24	12													
Kilkenny	16	3	40	4	11													
Laois		8	3	37	15	3												
Leitrim										11	4	9	9	6				
Limerick							17	6	75	5	34	2						
Longford								10	3	25								
Louth			47	6	18										32	7	50	78
Mayo																		
Meath			20	34	23	33			3									
Monaghan							20	2	29	10	1							
Offaly				9	10	26	17	3										
Roscommon									1	29	8	39	2	12				
Sligo													3	33	19	9	3	
Tipperary			11	2	49	9	51	11	27									
Waterford	2	28	8	27	5	4												
Westmeath							11	17	31	8	5				1			
Wexford	82	21																
Wicklow	37	29	14	3														

Meridian, which is the natural centre-line for GMT+0. The main advantage of GMT+1 would be brighter evenings, as mentioned above. The main disadvantage of GMT+0 would be that in early summer we would be sleeping through rather a lot of daylight. As the chart for Dublin (Figure 1) shows, GMT+0 gives about three months of dawn before 05:00, and a month with it at or shortly after 04:00. We currently ship an hour of this daylight into the evening, without affecting winter mornings.

The map below (Figure 3) shows the number of days with sunrise before 04:30 under permanent GMT+0. This varies between 33 days in west Kerry and 79 in Donegal, but it is also quite high in the populous east.

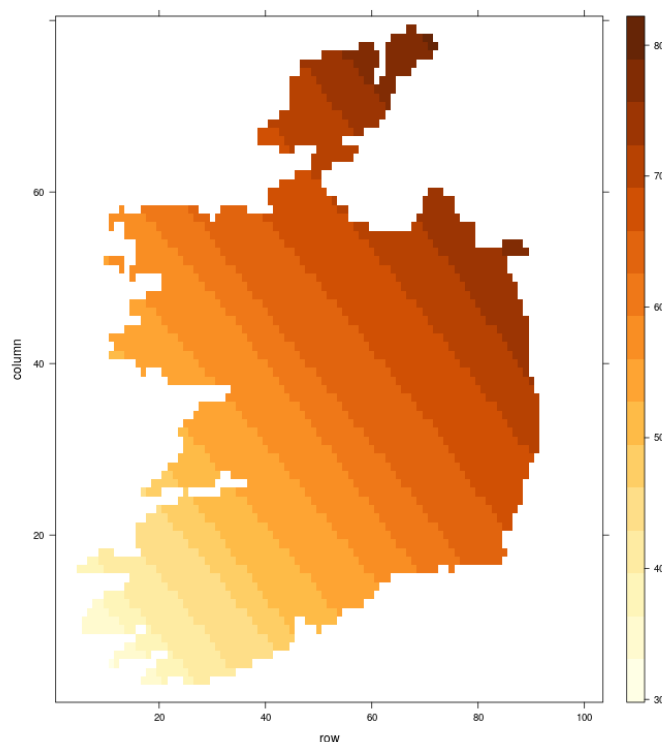


Figure 3: Number of summer days with sunrise before 04:30 under permanent GMT+0

We're west and north

The push to abolish the practice of changing the clock across Europe varies, and in some locations the net advantages of DST might be less. In Ireland we are relatively far north, so we benefit more from the practice, since day length changes more than further south. We are also quite far west within our timezone (the "natural" span for GMT should be from 7.5° East to 7.5° West; Ireland is between 5.4° and 10.6° West). Being to the west makes us much more affected by late sunrise. Figure 4 shows a map both the UK and Ireland, and makes it clear that the logic of abolishing DST is strong in the southeast of

England but weaker elsewhere: the number of days with sunrise after 09:00 is zero in the extreme southeast of England, and as high as 101 in the Hebrides; Ireland westerliness and Scotland's northerliness mean GMT+1 affects them similarly). As a country with particular geographic features, we need to make our case against countries that are more to the east of their timezone.

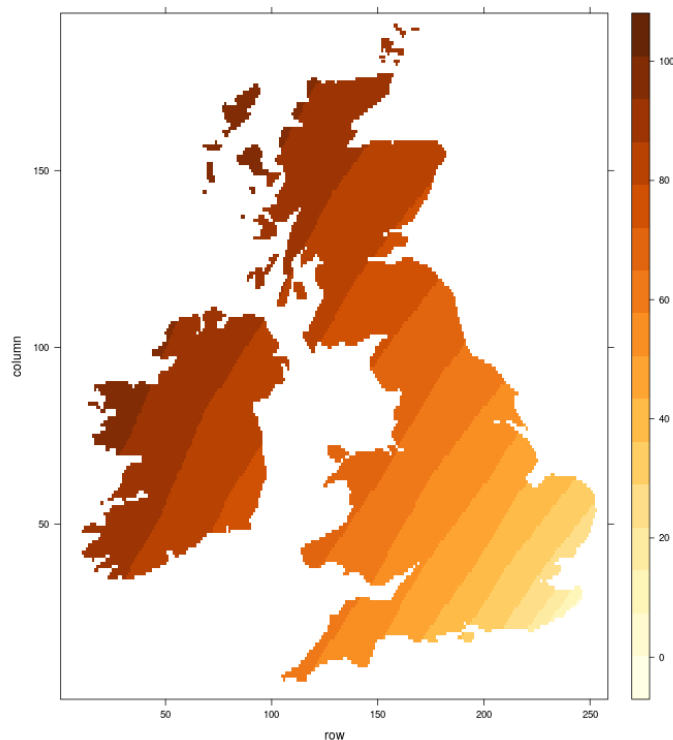


Figure 4: Winter days with sunrise after 09:00 under permanent GMT+1, UK and Ireland

Summary

If we shift to permanent GMT+0, we'll lose late evening light in early to mid summer. If we shift to permanent GMT+1, we will have across the country about 100 days every winter where sunrise is later than the very latest it is at present. In the winter, unlike in the summer, we are moving light from one part of the active day to another, and the advantages of lighter early evenings are counterweighed by the disadvantages of dark mornings.

Dark mornings will hit school travel worst. At present, the trip to and from school is in daylight for most children. GMT+1 will put the morning trip into the dark, without lightening the return journey. This will have negative effects, not least on active travel, and on safety of school children. I'm old enough to remember being issued with a reflective armband by the government, for safety on the morning walk to school, when this was tried before: It was a failure then and it is likely to be so again.

Dear Eoghan

Thank you for your email.

We have submitted the feedback for Dublin Institute of Technology online.

Kind regards

Oonagh Birchall

Assistant to:

Professor Brian Norton

President

Dublin Institute of Technology

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Uachtarán

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Gráinseach Ghormáin

Baile Átha Cliath 7

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Éire

TU Dublin...coming January 2019



Dear Sir/Madam,

Having consulted with the various interested parties across the ETB sector, no particular preference was indicated one way or the other in respect of seasonal clock changes. It was acknowledged that the brighter evenings could give more scope to learners to engage in after-school activities but this would result in the obvious drawback of learners going to school in relative darkness at certain times of the year. There was no strong view either way and ETBI is satisfied with either alternative.

I would like to express my gratitude to you for the broad and inclusive manner of the consultation.

Yours sincerely,

Martin Clohessy

Director of Organisation Support & Development

ETBI



Department of Justices & Equality
timeconsultation@justice.ie

30th November, 2018

Dear Sir/Madam,

I am responding to a letter issued by your Department to Pat O'Doherty, Chief Executive ESB, dated 13th November 2018, which requested an input from ESB into the ongoing consultation that proposes to end seasonal clock changes.

The consultation asks three questions:

1. Do you want to stop changing the clocks twice a year?

There is not a straightforward yes or no answer to this question.

From a general perspective, we note that a decision to move from the current arrangements would impact on the electricity demand profile. Depending on which time was agreed as standard, it could result in increased demand in mornings (e.g. lights on for longer), a more steep rise in demand in a morning, or a flatter curve in the evening (e.g. lighting and cooking loads spread over a longer period). None of the above have a material impact on ESB's generation, supply or distribution businesses but the impacts for energy trading activities need to be investigated further.

ESB would see certain merits to the proposal to end seasonal clock changes. For example, the current clock change process causes ESB some difficulty with our Network Operations systems, due to differences between server time changes from external systems (Voice Recording and Call Entry applications) and our core Outage Management System), which has to be carefully managed to mitigate the risk. The proposal to discontinue clock changes twice yearly would remove this risk.

However, the proposal could also cause ESB some issues. As the Department may be aware, work is underway on the implementation of the National Smart Metering Programme. The proposal, if pursued, will have an immediate impact on this programme, requiring a change to the proposed meter configuration. The current specification requires that the smart meters installed would be configured to automatically "clock change" twice each year. A change to the configuration would be required which may have implications for meter roll out timelines and would need to be discussed with the Commission for Energy Regulation.

In addition, many IT protocols or applications can be time sensitive. Therefore, we believe there could be a implications for some of our core IT systems. Consequently, a decision to move from the current time change process would require a project to identify and manage the changes required. This would have resultant cost and resource implications and could have knock on impacts for other work programmes, including the National Smart Metering



Programme. While we are currently unable to quantify the scale, it is clear that some potential impact is likely. For example, all businesses will have to assess the impacts for their processes and may have to rely on third party vendors to make the necessary IT changes.

More critical than the question of whether we would want to cease seasonal clock changes, is that we should synchronise clock movements between Ireland, Northern Ireland and Great Britain, as discussed under Q3.

2. *If the clock changes stop, do you want to remain on summer time or winter time?*

ESB has no specific preference, but again notes that we believe that we should synchronise clock movements between Ireland, Northern Ireland and Great Britain.

3. *What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland?*

ESB notes that having differing time zones between the Republic and Northern Ireland or the Republic of Ireland and the United Kingdom (UK) could cause some challenges.

One area of concern relates to financial transactions and underlying systems, as cut off times for specific transactions could then be different in different jurisdictions. A significant portion of ESB's financial transactions are with the UK. In the event the Republic of Ireland and UK were on differing time zones, this could shorten /lengthen the daily window available to transact with the UK. In the event the window was shortened, this introduces additional operational challenges and consequently increases our risk profile.

ESB notes that there is a risk that the Retail Market system would also be impacted. This is a system that facilitates the operation of the electricity supply market. The system may require some form of time stamping in both jurisdictions to manage market messages, reconciliations etc., if it were to facilitate a time differential. In addition, impacts for dual jurisdiction suppliers would also need to be considered. A detailed assessment would be required to fully assess this risk.

ESB Group operates in Ireland, Northern Ireland and Great Britain. From an ease of business point of view it would be important to maintain our synchronised time zone on these islands. ESB Group has many staff that commute across the border on a daily basis. We also have staff serving businesses in both GB and Ireland from the same location. It follows that a time zone differential between these two jurisdictions would make it more difficult to either have a job or operate a business that involved either cross border commuting or cross border customer service.

Similarly, we note that the Dublin - London air route is one of the busiest air routes in the world. Many of our colleagues travel to GB on one day round



trips. Being in the same time zone facilitates this as commuters neither 'lose' nor 'gain' an hour when travelling to either jurisdiction.

From a Network Maintenance perspective, we note that storm response issues/times - while impacted by light - are unpredictable and are typically more heavily influenced by both the weather and the timing of the storm rather than when daylight commences.

Therefore, ESB would have a strong preference for remaining on the same time zone as the United Kingdom.

We do acknowledge, however, that there could be advantages to having differing time zones between the Republic and Northern Ireland. The diversity between peaks could flatten the overall peak demand in the evenings, potentially reducing the overall installed capacity required for the island of Ireland.

The impact of differing time zones between Ireland and Northern Ireland from an operational impact would be of more relevance to EirGrid, as the Transmission System Operator (TSO), as there is interconnectivity between the electricity systems at transmission system level both between the Republic of Ireland-Northern Ireland and Wales-Ireland. Therefore, the operations systems would need to be capable of catering for operating instructions being issued in one time zone on assets operating in a different time zone. It is clear the technology exists to cater for this (e.g. GB and France currently have interconnections which can operate on different time zones) - it is just not clear whether the systems currently installed in Ireland have the required capabilities.

We appreciate the opportunity to input into the consultation process. If any queries arise, or any additional input is required, please revert.

Regards

A handwritten signature in black ink that reads 'Marie Sinnott'.

Marie Sinnott
Group Compliance & Risk Manager

Time Consultation Mail In **Query**

Dear Sir / Madam

Please find attached European Movement Ireland's submission to the clock change consultation. We are grateful for the opportunity to make this submission and look forward to hearing the results of the consultation

Best regards

Sharon Waters

Communications Manager

Get [Outlook for iOS](#)(See attached file: 181127 Submission for the consultation on seasonal clock changes_v1.docx)

Department of Justice and Equality: Consultation on Seasonal Clock Changes



European Movement Ireland would like to commend the Department of Justice and Equality for its commitment to gathering the views of Irish citizens with regards to seasonal clock changes. The EU-wide public consultation on the issue, which ran from 4 July - 16 August 2018, had the highest participation rate of any European Commission public consultation, with 4.6 million responses from across all Member States. The high participation rate demonstrates that the biannual switching of the clocks is a much larger issue in Europe than it might at first seem. It is of great importance that the EU listens to the views of its citizens and ensures that their voices are heard in Brussels.

European Commission President, Jean-Claude Juncker, echoed this sentiment when he stated in his final State of the European Union address on 12 September 2018, "Clock-changing must stop. Member States should themselves decide whether their citizens live in summer or winter time. It is a question of subsidiarity." The Department of Justice and Equality's decision to hold a public consultation for Irish citizens is therefore not only timely, but a perfect example of the principle of subsidiarity in practice, and an excellent way to encourage participatory democracy and Irish engagement with EU issues.

Although the European Commission's public consultation had the highest number of responses of any previous EU public consultation, Ireland's own participation rate was not as high compared to some of our fellow Member States, with only 0.24 per cent of our national population participating. It is important to note that Irish citizens who did participate voted overwhelmingly to abolish daylight saving time (DST), with 88 per cent of respondents saying they wanted to get rid of the law. Our nearest neighbour, the UK, had the lowest participation rate of all Member States at 0.02 per cent of the national population, however, it is worth noting that 82 per cent of the UK citizens who participated were in favour of abolishing seasonal clock changes.

Although participation in the European Commission's consultation may have been relatively low in Ireland and the UK, it is important that we respect the amount of interest in the consultation shown across the EU, and to make a conscious effort to encourage Irish citizens to share their opinions on the matter. By bringing the issue to the attention of as many Irish citizens as possible and giving them another chance to have their say, the Department of Justice and Equality is helping to promote the democratic efforts of the EU.

Undoubtedly, there will be differing views amongst Irish citizens and stakeholders on whether to opt for permanent summertime or permanent wintertime, or whether to maintain the current system of seasonal clock changes. While permanent summertime would result in brighter evenings throughout the year, it would also mean darker mornings in the winter than we currently experience. Conversely, permanent wintertime would mean brighter mornings throughout the year, but darker evenings in the summer than we have been accustomed to.

In the European Commission's public consultation, respondents were asked to give reasons for their opinions. For those in favour of abolishing the biannual clock switch, human health (43 per cent) and lack of energy saving (20 per cent) were the most popular reasons, while for those in favour of keeping the current arrangements, leisure activities in the evenings (42 per cent) was the most popular reason. Respondents were also asked to choose their preferred option from permanent summertime or permanent wintertime, for which 56 per cent of citizens answered in favour of permanent summertime, 32 per cent for permanent wintertime and 11 per cent gave no opinion.

One key consideration for Ireland to look at is the position of the United Kingdom. The UK and Ireland first adopted DST in 1916, as an energy-saving mechanism during the First World War. Should the UK adopt a different position than Ireland on whether to opt for permanent summertime or permanent wintertime, this could lead to a time difference between the Republic of Ireland and its closest neighbours. The fact that the UK is due to leave the EU on 29 March 2019, raises the possibility that in the future, Ireland may have to choose between abolishing DST and creating a time-zone border with Northern Ireland, which could result in heavy disruption for cross-border activities. We are delighted to see the Department of Justice and Equality has taken this into consideration in the consultation survey, asking the question: "*What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland?*", as it is important that Irish citizens are consulted on this possibility.

EM Ireland expects that other issues such as the potential impact on agricultural life, transport, aviation and road safety will present as concerns amongst Irish citizens. Interestingly, the Road Safety Authority of Ireland (RSA) submitted an existing report from 2015 on the "*The potential impact of the implementation of the Brighter Evenings Bill on road safety in the Republic of Ireland*" to the European Commission's public consultation. The report demonstrated that wintertime would lead to brighter mornings and summertime to brighter evenings, and therefore less traffic accidents would occur in either morning or evening conditions respectively. Overall, the report stated no final conclusions could be drawn from this, as the two options are likely to end up with a similar number of accidents.

It is likely that there will be many arguments both for and against permanent summertime or wintertime, as similar to the outcome of the 2015 RSA report, there are usually pros and cons to both sides. It is therefore even more important that citizens are consulted on the issue and given an opportunity to present their arguments and concerns. EM Ireland looks forward to hearing the results of this public consultation, and we would like to commend the Department of Justice and Equality once again for its efforts in informing and engaging Irish citizens on this important issue.

A Chara,

Go raibh maith agat as an deis tuairim a léiriú ar an cheist seo.

Tá 5 oifig ag Foras na Gaeilge – 4 oifig i bPoblacht na hÉireann agus 1 oifig i mBéal Feirste. Lena chois sin de bharr gur Foras Trasteorann é an Foras Teanga, bíonn Foras na Gaeilge i dteagmháil leis an Roinn Pobal ó thuaidh ar bhonn laethúil agus lenár gcomhghleacaithe i nGníomhaireacht na hUltaise i mBéal Feirste ar bhonn rialta.

Tá cuntais bainc againn ó thuaidh, agus fostaithe, comhaltaí Boird agus deontaithe sa dlínse ó thuaidh. Bímid ag trádáil le roinn siopaí leabhar ó thuaidh.

Dá n-athrófaí na socruithe reatha ama, bheadh sé tábhachtach nach mbeadh difear ar bith idir an dlínse ó thuaidh agus an dlínse ó dheas. Dá mbeadh an dá chuid den oileán ag feidhmiú de réir dhá chóras éagsúla ama, chruthófaí deacrachtaí praiticiúla suntasacha dúinn a bhaineann le cúrsaí riaracháin.

Bheinn buíoch díot ach admháil a chur chugam go bhfuil an rhpóst seo faighte agat le haghaidh mo chuid taifead le do thoil.

Le dea-ghuí,

Seán Ó Coinn

Príomhfheidhmeannach

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YouTube: <https://www.youtube.com/channel/UCbvJrihkIb8OhqImsoFvNbw>

Dear Mr. O'Brien,

I am to advise that Galway & Roscommon Education and Training Board (GRETB) do not wish to make any submission in this matter.

Kind regards,

Mairéad

Mairéad Thompson,

Head of Corporate Services GRETB.

Mairéad Thompson n Corporate Services Department n Bord Oideachais & Oiliúna Gaillimh & Ros Comáin n Education & Training Board Galway & Roscommon n An Coiléar Bán n Baile Átha an Rí n Co. na Gaillimhe ([+353 91 874534 7](tel:+353918745347) [+353 91 874500](tel:+35391874500) * mairéad.thompson@gretb.ie 8 www.gretb.ie

[cid:image003.png@01CF9085.78CFFB20](#)

Séanadh Ríomhphoist

Tagann an ríomhphost seo ó Bhord Oideachais agus Oiliúna na Gaillimhe agus Ros Comáin. Tá an ríomhphost, agus aon iatán a ghabhann leis, faoi rún agus faoi phribhléid agus ceaptha d'aontoisc le haghaidh úsáide an té nó na heagraíochta chun a ndíreofar iad. Tá dianchosc ar chraobhscaoileadh, ar dháileadh nó ar chóipeáil neamhúdairithe ar bith, díreach nó indíreach, an ríomhphoist seo nó aon iatán a ghabhann leis. Má tá an ríomhphost seo faighte agat trí dhearmad, cuir an seoltóir ar an eolas agus scríos an t-ábhar ó do chóras le do thoil.

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GNI Response

*Consultation on Seasonal Clock Changes
(Department of Justice and Equality)*

November 2018



Part of **ervia** group

1. Introduction

Gas Networks Ireland (GNI) is a fully owned subsidiary of Ervia (formally known as Bord Gáis Éireann). GNI builds, owns, operates and maintains the natural gas network in Ireland and connects all gas customers to the network, regardless of their gas supplier. There are currently over 688,000 customers connected to the gas network and GNI's core purpose is to ensure these customers receive a safe, efficient and secure supply of natural gas, 24 hours a day, 365 days a year. GNI operates network assets in Northern Ireland ('NI') and Great Britain ('GB') (specifically in South West Scotland) which connect to the Irish gas network. GNI's response to this Consultation considers these circumstances.

2. GNI Response to Consultation Questions

GNI's responses to the three questions posed by the Department of Justice and Equality, in the context of the Consultation on Seasonal Clock Changes issued on 26th October 2018, are outlined in turn.

Q1. Do you want to stop changing the clocks twice a year?

No response from GNI to this question.

Q2. If the clock changes stop, do you want to remain on summer time or winter time?

No response from GNI to this question.

Q3. What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland?

As indicated in our responses to questions 1 and 2 above, GNI does not have a view as to whether seasonal clock changes should cease or whether Ireland should remain on summer time or winter time. However, GNI does wish to highlight the implications for the gas network in the Republic of Ireland ('ROI') should the time zone in ROI differ from the time zone in NI and GB.

The ROI gas network, governed by the Gas Networks Ireland Code of Operations¹, has operated in close alignment with the gas network in GB since gas was first imported from Scotland in 1993. Ireland continues to import a significant proportion of gas from GB.² The gas networks of Northern Ireland and the Isle of Man ('IOM') are supplied via GNI's network in Scotland.

Different time zones between Ireland and NI/ GB would result in misalignment between both the ROI and UK (including NI) gas day³ and electricity day⁴. Such misalignment would increase network

1 <https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/Gas-Networks-Ireland-Consolidated-Code-of-Operations-V5.02-April-2018.pdf>

2 In 2017, 33% of Ireland's gas demand came through the subsea interconnectors via the Moffat Entry Point (in Scotland). The Corrib Gas Field coming on line in December 2015 has resulted in a decrease in ROI dependency on gas imports from the UK; however, as Corrib production declines in the medium term, our dependency on UK imports is likely to increase.

3 As per the CAM Network Code, Art. 3 (16), 'gas day' means the period from 5.00 to 5.00 UTC the following day for winter time and from 4.00 to 4.00 UTC the following day when daylight saving is applied.

4 Across ROI and UK, Electricity Day D commences at 23:00 GMT/IST the day before and ends at 23:00 GMT/IST on day D.

operational complexity for Transmission System Operators ('TSO') and Shippers alike (as highlighted by Vazquez et al., 2012⁵) and require operational and system changes as to how the ROI, NI and GB gas networks would operate.

In terms of specific implications, different time zones would affect, *inter alia*:

1. Offering of daily bundled capacity products.
2. Nomination⁶/matching processes at entry and exit points.
 - **Figure 1** (overleaf) indicates the location of the three ROI Entry Points. If the time zones were to differ between the ROI and the UK/ GB, it would mean that the time at two entry points (Bellanaboy from the Corrib gas field and Inch in ROI) would differ to that at the third entry point (Moffat Interconnection Point (IP) in Scotland), which would result in additional operational complexity and cost. It would result in IT system changes to account for the difference in Gas day start/end times. Users of the GNI system, sourcing their gas from GB and perhaps further upstream from Norway or mainland Europe, would need to allow for multiple changes in time zones. The issues highlighted could be overcome with IT changes but would require sufficient lead-time to develop and implement.
 - In this scenario, the time at Moffat would also differ to that at Gormanston (in ROI).
 - A similar scenario would arise if there were differing time zones at either end of the South-North pipeline, which runs from Gormanston, in County Meath (ROI), to Ballyclare, Co. Antrim (NI) (where it links into the North-West pipeline).
3. Interconnection Agreements, Codes of Operations etc. with reference to gas day times.
4. Contracts, with reference to local time.

5 Vazquez, M., Hallack, M. and Glachant, J-M. (2012). [Designing the European Gas Market: More Liquid & Less Natural?](#) *Economics of Energy & Environmental Policy, International Association for Energy Economics*, 0(3).

6 A nomination is an instruction from a natural gas shipper to a TSO to flow a volume of gas.

Figure 1: Overview of Gas Networks Ireland's Transmission System

