

Network Development Plan 2019 – GNI Consultation Response

As the Transmission and Distribution System Operator for gas, Gas Networks Ireland is responsible for the development and safe operation of the gas network, taking account of the long-term needs of the system. GNI has licence obligations to produce a Ten-year Network Development Plan (NDP) annually. Before the final version of the NDP published, the Commission of Regulation of Utilities (CRU) is required to hold a public consultation on the draft NDP. Based on the responses received to the consultation, GNI updates the NDP where necessary and publishes the final version on the GNI website.

The CRU held a public consultation on GNI's draft ten year Network Development Plan covering the period 2018/19 – 2027/28.

This public consultation ran for 4 weeks from 31/08/2020 to 28/09/2020. As part of the CRU's public consultation on Gas Networks Ireland's draft 2019 NDP, the CRU received views and comments from eleven respondents as follows:

- An Taisce
- Future Proof Clare
- Global Energy Transition Ltd
- Friends Of The Irish Environment
- Irish Offshore Operators Association
- Friends Of The Earth
- Safety Before LNG
- Not Here Not Anywhere
- ESB
- Bord Gáis Energy
- An individual in a personal capacity

GNI appreciates the responses received from all parties. Set out below is an overall response to substantive views and comments raised by the above respondents as part of the public consultation.

1. Energy Policy and Data Freeze

The NDP provides an overview of how the gas network may develop over a ten-year period. It incorporates analysis and commentary on current supply and demand for gas, as well as on projected gas consumption and development of infrastructure. The primary function of the document is to provide a ten year adequacy assessment on the gas network, to ensure adequate infrastructure is in place to safeguard a secure and resilient gas transportation system to meet Ireland's projected energy needs over the ten year NDP horizon. As such, the modelling assumptions adopted in the NDP are based primarily around current policy measures in place, while also incorporating the potential for policy change to address energy and climate targets.

To allow time to complete the detailed modelling and analysis required to produce the NDP, a modelling 'data freeze' is required. This results in a lag between the time when modelling assumptions are finalised and when the NDP becomes available for public consultation. The modelling data freeze date for the 2019 NDP was September 2019. At this time, the key document informing the NDP energy policy assumptions was the draft National Energy and Climate Plan 2021-2030 (December 2018), while the ambitions set out in the Climate Action Plan (June 2019) were also incorporated in certain scenarios. Each year, these assumptions are updated to align to latest energy policy measures in place at the time of the data freeze.

2. Projects of Common Interest

In accordance with Article 3 of Regulation (EU) 347/2013, as amended, on guidelines for trans-European energy infrastructure, Gas Networks Ireland is obliged to confer with regional groups on relevant regional and national infrastructure plans. The Projects of Common Interest (PCI) projects outlined in the NDP are those currently on the 4th list of PCI projects which was published in October 2019. Project promoters will have to reapply to the European Commission for inclusion on the 5th PCI list, which is expected to be published in October 2021. The European Network of Transmission System Operators (ENTSOG) will evaluate all candidate gas projects as required, as part of its Ten-Year Network Development Plan (TYNDP).

3. Strategic Environmental Assessment (SEA) of the NDP

In order to comply with the requirements of Article 9 of the European Communities (Environmental Assessment of Creation Plans and Programmes) Regulations 2004 (S.I. No. 435 of 2004), as amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (S.I. No. 200 of 2011), Gas Networks Ireland has undertaken a Strategic Environmental Assessment (SEA) screening assessment to determine if the NDP 2019 is to give rise to likely significant effects on the environment.

The outcome of the screening process concluded that SEA is not required for the NDP 2019, based on the following considerations:

- The NDP is a supply/demand analysis and capacity statement required by EU and National legislation. While the NDP does outline the capital investment proposals to be implemented over the next ten years, it does not provide a framework for future development consent of projects listed in Annex I and Annex II of the EIA Directive.
- Gas Networks Ireland is in the process of preparing a second plan, the Network Implementation Plan (NIP) which will set out in more detail, the manner in which the short-term capital investment proposals identified in the NDP will be developed. The NIP is more project-specific and will include greater detail on the capital investment proposals included in the NDP, including their locations, nature, extent etc. A SEA has been carried out in respect of the draft NIP, and a SEA Environmental Report has been prepared.

This determination and associated documentation are available on Gas Networks Ireland's website at <https://www.gasnetworks.ie>.

4. Appropriate Assessment (AA) of the NDP

In accordance with Article 6(3) of the EU Habitats Directive (92/43/EEC) and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), Gas Networks Ireland, as the competent authority, is responsible for undertaking an

Appropriate Assessment (AA) screening assessment to determine if the NDP 2019, individually or in combination with other plans or projects, is likely to have a significant effect on any European site(s).

The outcome of the screening process concluded that AA is not required for the NDP 2019, by virtue of the fact:

- The NDP 2019 is not directly connected with or necessary for the management of any European site;
- The NDP is a supply/demand analysis and capacity statement. While the NDP does outline the capital investment proposals to be implemented over the next ten years, it does not define the exact location, nature, size/operating conditions of any proposals, or allocates resources to a specific area in Ireland. As no specific development proposals are provided, there is no potential for the NDP 2019 to give rise to significant effects on any European site(s): and
- No potential for transboundary or cumulative effects have been identified.

This determination and associated documentation are available on Gas Networks Ireland's website at <https://www.gasnetworks.ie>.

5. Network Implementation Plan

As noted above, Gas Networks Ireland is in the process of preparing a second plan, the Network Implementation Plan (NIP). The purpose of the NIP is to set out in more detail, the manner in which the short-term capital investment proposals identified in the NDP will be developed in the Plan area over the three year plan period 2020 - 2023. This will include greater detail on the capital investment proposals included in the NDP, including their locations, nature, extent etc. As the NIP is more project-specific than the higher-level NDP. In accordance with the requirements of S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011), a Strategic Environmental

Assessment (SEA) is being carried out in respect of the draft NIP, and an SEA Environmental Report has been prepared. Further, in accordance with Articles 6(3) and 6(4) of the EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), an Appropriate Assessment is being carried out in respect of the draft NIP, and a Report for the purposes of Appropriate Assessment (AA) screening and a Natura Impact Report have been prepared.

The associated documentation are available of Gas Networks Irelands website at www.gasnetworks.ie/nip.