



Gas
Networks
Ireland

Network Development Plan 2024

Gas Networks Ireland Consultation Response

1 Introduction

As the Transmission and Distribution System Operator for gas, Gas Networks Ireland (GNI) is responsible for the development and safe operation of the gas network, taking account of the long-term needs of the system. GNI currently has a licensing obligation to produce a ten-year Network Development Plan (NDP) annually. Before the final version of the NDP is published, the Commission of Regulation of Utilities (CRU) is required to consult all actual or potential system users. This is undertaken via a public consultation on the draft NDP, hosted by the CRU. Based on the responses received to the consultation, GNI updates the NDP where appropriate and publishes the final version on the GNI website.

The CRU held a public consultation on GNI's draft ten-year NDP covering the period 2023/24 – 2032/33 inclusive.

This Public Consultation ran for four weeks from 18th March 2025 to 15th April 2025.

As part of the Public Consultation, the CRU received views and comments from eight respondents:

- Bord Gáis Energy
- BnM
- An Taisce
- Chambers Ireland
- Cork Chamber
- SSE
- Energia
- Not Here Not Anywhere

GNI appreciate the level of interest shown in the NDP 2024 and welcome the detailed feedback received from the eight respondents. While the scope of the NDP aims to cover all aspects influencing medium-term gas demand supply and demand in Ireland, it is noted that in some instances the views and comments received fell outside the scope of the Network Development Plan and of this Public Consultation. Hence, GNI's responses set out below are limited to the views and comments received that relate to the scope of the Public Consultation. More broadly, and where relevant, GNI has taken aspects of the responses that fall outside of the scope and timeline of the NDP into consideration in other areas within GNI's business.

The Public Consultation has not resulted in material changes being made to NDP 2024. Where relevant, it is outlined below where views conveyed in the public consultation responses have been factored into the planning for the next iteration of the Network Development Plan. The final version of the NDP 2024 is now published on GNI website, along with this response letter.

1.1 NDP Model 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 of 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 informed primarily around current policy measures in place and their potential impact on gas supply and demand, while also incorporating the potential for policy change to address energy and climate targets and an expectation of their delivery timelines. 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 NDP 2024 was September 2024. Each year, these assumptions are updated to capture the expected delivery of the latest energy policy measures in place at the time of the data freeze.

1.2 NDP Study Period

As mentioned above, the NDP is a ten-year lookahead; the final year of the 2024 NDP time horizon is gas year 2032/33. Hence, any detailed forecasting of gas supply and demand beyond this ten-year period is outside the scope of the NDP.

Gas Networks Ireland recognize the importance of looking beyond the ten-year period to ensure prudent technical and economic planning for a decarbonised carbon gas network. We are in the process of developing a longer-term adaptive planning document, the Core Flexibility Report, for delivery in early 2026. More detail of the scope of what is to be included in the longer-term forecasting can be found within the PC5 Regulatory Framework document¹ on the CRU's website.

¹ [PC5 Regulatory Framework](#)

1.3 Consultation Questions

The following questions were included in the Public Consultation, which respondents had the option of using as a basis for their review of the Network Development Plan.

Q1. Section 10 of the report describes GNI's gas network planning. It briefly references capacity upgrades to compressor stations in Scotland and the Southern Area Reinforcement (SAR) project, but does not include details on other network upgrades, future investments or timeframes for such projects. What additional information would you like to see presented in relation to infrastructure development?

Q2. Do you agree with the assumptions GNI have used in their modelling (for example, treatment of biomethane, hydrogen and interconnection), and the presentation of supply and demand data?

Q3. In Section 6.5.8, GNI have updated their modelling to include the contribution from gas to the Residential and Industrial and Commercial sectors and to all fuels under the Electricity sector and have compared these emission forecasts to legally binding carbon budgets. Are there any additional improvements to this approach or is any further clarity needed here in your view?

Q4. GNI's carbon projections in Section 6.5.8 indicate that only the 'low' scenarios are likely to meet the carbon budgets. Do GNI provide sufficient information in the NDP on how the gas network can meet carbon budgets under different scenarios? What additional information would you like to see presented?

Q5. Table 6-2 presents the annual large new industrial and commercial demand forecasts. Should there be further consideration given to the detail and presentation of industrial and commercial and large energy user demand in this report? How could recent developments in this sector (such as CRU's Review of Large Energy Users Connection Policy²) be accounted for in the TYNDP process?

Q.6 What is your view on potentially changing the publication of the TYNDP from annually to at least every two years, to align with anticipated legislative changes³? What improvements would you expect to see in a revised plan?

Q.7 As noted in Section 2 of this document above, the CRU is actively engaging with GNI on the development of an interruptible gas capacity product. In your view, is sufficient information provided in the 2024 NDP on interruptible gas capacity products? Is there additional information that you would like to see provided?

² <https://www.cru.ie/publications/28573/>

³ [Article 55 of the Gas Directive, 2024/1788](#). (55(1) "At least every two years, all transmission system operators and hydrogen transmission network operators shall submit to the relevant regulatory authority a ten-year network development plan based on existing and forecast supply and demand after having consulted the relevant stakeholders").

2 Gas Networks Ireland Responses

2.1 Gas Network Infrastructure Projects (linked to Q1)

Consultation respondents noted the importance of identifying key infrastructure projects (such as the Strategic Emergency Gas Reserve) and associated delivery risks and timelines for delivery.

The Network Development Plan includes details of projects that have a material impact on the operation of the gas network and are in an advanced stage in terms of delivery. These projects have typically undergone detailed design and have a definite timeline for delivery.

The Strategic Emergency Gas Reserve (SGER) project is not included within the time horizon of NDP 2024. This project has yet to come through the detailed design phase and, as such, cannot be modelled in detail as part of the NDP as its design parameters are yet to be defined.

The requirement for potential further investments in gas network infrastructure will be highlighted in future Network Development Plans as required, based on the assessment of the demand forecast vs. the supply potential.

2.2 Carbon Emissions and Budgets (linked to Q3, Q4)

Consultation respondents noted both the legally binding nature of Sectoral Emission Ceilings and Carbon Budgets, and also the system planning implications of not meeting same.

Gas Networks Ireland, in setting out the inputs and assumptions behind the three scenarios of the Network Development Plan (NDP), takes into account all national energy policies in place prior to the data freeze date. GNI acknowledges and fully supports the legally-binding Sectoral Emission Ceilings and Carbon Budgets introduced in 2022⁴. It has been consistently recognised that meeting the carbon budgets and targets by 2030 is challenging⁵ and that the scale and pace of the action required, is significant. To ensure prudent planning for the capacity of the gas network, which is the objective of the NDP report, Gas Networks Ireland must take on board this uncertainty when laying out the NDP scenarios. Hence, the Best Estimate and High scenarios reflect this uncertainty in meeting the carbon budgets and targets, while the Low gas demand scenario included in NDP 2024 aims to show stakeholders a pathway to meeting these carbon budgets and targets, which assumes accelerated uptake of renewable and alternative power generation and heating technologies is achieved in the next 5 years out to 2030.

2.3 Large Energy Users (linked to Q5)

Consultation respondents referenced the CRU proposed decision paper on LEUs and requested the inclusion of analysis of same in the NDP.

The data freeze date for the NDP modelling inputs was September 2024. The proposed decision paper on Large Energy Users (LEU) connection policy was published by the CRU for consultation on 18th February 2025. This paper sets out a potential pathway for prospective LEU and data centre connection applications to the

⁴ [Sectoral Emission Ceilings](#)

⁵ [Ireland's Greenhouse Gas Emissions Projections 2023-2050](#)

electricity grid. The CRU is not proposing to introduce any new decisions relating to connections to the gas network as part of the LEU policy review process. For the purposes of the NDP 2024 horizon, all scenarios include only those Data Centre customers with connection agreements already in place prior to the Government Statement⁶ on the role of data centres and prior to the proposed LEU Connection Policy publication.

Once a final decision as regards Large Energy Users connection policy is published, Gas Networks Ireland will factor the implications of this policy into our demand forecasting. In the meantime, Gas Networks Ireland continue to assess new Large Energy User connection inquiries and their potential impact on gas demand.

2.4 Gas Supply Assumptions (linked to Q2)

A correction to “Figure 10-1: Combined system entry capacity versus peak day gas demand” of the NDP will be made ahead of publishing the final report. The Best Estimate does not forecast a supply deficit in meeting demand across the 10-year horizon. Hence, the “Increased System Entry Capacity” in Figure 10-1 will be corrected to reflect this forecast.

The High scenario forecasts a very low supply deficit on a 1-in-50 peak day by the end of the NDP horizon of approx. 3% by 2032/33. This will be monitored in future NDPs. However, the gas network is planned to meet the Best Estimate 1-in-50 forecast and hence, the High scenario is not currently used for gas network investment planning.

2.5 Environment Screening

Consultation respondents requested that the 2024 NDP undergo both a Strategic Environmental Assessment Screening Report and a screening for Appropriate Assessment.

Gas Networks Ireland has completed both a Strategic Environmental Assessment (SEA) Screening Report and a screening for Appropriate Assessment and will publish both of these reports on our website alongside the final version of the Network Development Plan 2024.

2.6 Interruptible Gas Capacity Products (Linked to Q7)

Consultation respondents requested additional information on Interruptible Gas Capacity Products, and the cost and system impacts of same.

Interruptible Gas Capacity Products are not currently offered, and do not currently exist, as an option for contracting capacity on the gas grid. Capacity is currently only offered to customers on a firm basis. The design and potential introduction of an Interruptible Product as an option for customers to connect to the gas grid is under consideration and bilateral discussion between Gas Networks Ireland and the CRU.

Hence, Interruptible Gas Capacity Products are not mentioned within the scope of the NDP 2024 as they are currently only being considered as a potential option for future customers, and as such cannot be factored into the demand outlook.

⁶ [Government-statement-on-the-role-of-data-centres-in-irelands-enterprise-strategy.pdf](#)

2.7 Frequency of publication of the NDP (linked to Q6)

Consultation respondents highlighted the potential for stepped changes in published outputs as a potential consequence of moving the NDP to a biennial publication.

The Directive of the 4th Gas Package⁷ allows for Member States to decide on the future frequency of network development plans:

“TSOs are required to submit a ten-year network development plan at least every two years.”

This Directive is subject to transposition into Irish law by August 2026. Hence, the requirement for an NDP may move to every two years following this transposition.

Gas Networks Ireland recognise the importance of gas demand and supply forecasting as a consideration for our stakeholders and customers in their future planning. As such, if the NDP frequency moves to every two years, **in the interim year we will publish the Core Flexibility Report (CFR)**, which will incorporate a *“flexible and adaptive planning approach to system operation and network planning”*⁸. The CFR will aim to *“acknowledge and respond to the key policy / sector changes that GNI expect in the medium to long-term (covering at least the next 10-year period) and should describe a central plan / pathway for the development of the gas network. This should include a series of actions which must be taken given known policy goals, along with trigger points, which when met will require GNI to adapt its approach.”* Hence, the CFR report would provide stakeholders with a view of gas demand and supply forecasts under different investment pathways to at least 10 years.

⁷ [Directive - EU - 2024/1788 - EN - EUR-Lex](#)

⁸ [CRU Decision on the PC5 Regulatory Framework 0.pdf](#)