

File With _____

SECTION 131 FORM

Appeal NO: ABP 0313583Defer Re O/H ☐

TO: SEO

Having considered the contents of the submission dated/ received 14/2
fromApplicant I recommend that section 131 of the Planning and Development Act, 2000☒/not be invoked at this stage for the following reason(s): no new issuesE.O.: [Signature]Date: 25/2/25

To EO: _____

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORMAppeal No: ABP 313583

M _____

Please treat correspondence received on 14/2 as follows:

- | | |
|---|---|
| 1. Update database with new agent for Applicant/Appellant _____ | 1. RETURN TO SENDER with BP _____ |
| 2. Acknowledge with BP <u>23</u> | 2. Keep Envelope: <input type="checkbox"/> |
| 3. Keep copy of Board's Letter <input type="checkbox"/> | 3. Keep Copy of Board's letter <input type="checkbox"/> |

Amendments/Comments

5132 longL/D 4/3

4. Attach to file

- | | |
|--|---|
| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input checked="" type="checkbox"/> | |

RETURN TO EO ☐EO: [Signature]Plans Date Stamped ☐Date Stamped Filled in ☐AA: [Signature]Date: 20/2/25Date: 21/02

J Sweeney

Dáire Littleton Caden

From: Bord
Sent: Dé hAoine 14 Feabhra 2025 17:24
To: Appeals2
Subject: FW: ABP Ref - 313583-22 (FW21A/0151) - Applicant Response
Attachments: Appendix 4 - P281(1) Transmission Connection Agreement SUBMITTED.pdf; Appendix 2 - P281(1) Offer Letter SUBMITTED.pdf; Appendix 3 - P281(1) Acceptance Letter SUBMITTED.pdf; Huntstown ABP Submission 140225.pdf; Appendix 1 - A.Cox Letter (1)[4].pdf

From: Suzanne McClure <suzanne@brockmcclure.ie>
Sent: Friday 14 February 2025 17:11
To: Bord <bord@pleanala.ie>
Subject: ABP Ref - 313583-22 (FW21A/0151) - Applicant Response

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Sir/Madam,

We are instructed by our client Huntstown Power Company Limited, The Generali Building (formerly The Liberty Centre), Blanchardstown Retail Park, Dublin 15 (D15 YT2H) to lodge this submission in response to a letter issued by An Bord Pleanála inviting a submission from the applicant in accordance with Section 132 of the Planning & Development Act 2000 (as amended). As no fee is required, we have confirmed with the Board that this submission can be made via email.

Please see attached **Letter and 4no. appendices as attachments** for consideration by the Board.

We look forward to an expedited decision.

Kind regards

Suzanne

Suzanne McClure

Brock McClure
Planning & Development Consultants
63 York Road
Dún Laoghaire
Co. Dublin

Suzanne@brockmcclure.ie
[+353 86 233 6112](tel:+353862336112)
[+353 1 559 3859](tel:+35315593859)



**Brock
McClure**
PLANNING & DEVELOPMENT CONSULTANTS



TRANSMISSION CONNECTION AGREEMENT

EirGrid plc.

and

Huntstown Power Company Limited

[illegible]

[illegible]

THIS AGREEMENT is made the

BETWEEN:

- (1) **EirGrid plc**, a statutory corporation registered at The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4 (hereinafter called the “**Company**”); and
- (2) **Huntstown Power Company Limited**, with a registered address of Huntstown Power Company Limited, The Liberty Centre, Blanchardstown Retail Park, D15 YT2H, Dublin 15 and company registration number of 265062 (hereinafter called the “**Customer**”)

and each of the parties hereto being a “Party” and the term “Parties” shall be construed accordingly.

WHEREAS:

- (A) The Customer has applied to the Company for connection of the Facility to the Transmission System and use of the Transmission System to transport electricity to and/or from the Facility through the Transmission System.
- (B) The Company has agreed to the connection of the Facility to the Transmission System at the Connection Point and to the Customer using the Transmission System to transport electricity to and/or from the Facility through the Transmission System.
- (C) The Parties make this Transmission Connection Agreement hereinafter referred to as the “Connection Agreement” to record the terms and conditions upon which (amongst other matters) the Parties will carry out their respective Connection Works, the Customer will pay the Charges and Security to the Company and Energisation will be achieved.
- (D) The Parties agree that the terms set out in the General Conditions as amended by the Company and approved by the CER from time to time are incorporated into this Connection Agreement and the interpretation rules set out in the General Conditions and shall be the rules of construction of this Connection Agreement.

IT IS HEREBY AGREED as follows:

1.2 The Parties agree that the Offer Letter is incorporated into this Connection Agreement.

[illegible]

[REDACTED]
 [REDACTED]
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— 10 —

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IN WITNESS WHEREOF the Company and the Customer have caused this Connection Agreement to be executed on date above first herein written.

Signed for and on behalf of:-

DocuSigned by:

370E39F11D8E4A4
EIRGRID PLC.

Print Company Signatory Name in Block Capitals: Michael Mahon

DocuSigned by:

8332C383C8E044B...
HUNTSTOWN POWER COMPANY LIMITED

Print Customer Signatory Name in Block Capitals: Conor Keane



Our ref. P28I(1)

Huntstown Power Company Limited,
The Liberty Centre,
Blanchardstown Retail Park,
Dublin 15,
D15 YT2H

01st September 2020

OFFER LETTER

**For Connection of a Facility with [REDACTED] ([REDACTED])
an Maximum Import Capacity (MIC) of 190 MVA at Huntstown, Co. Dublin**

Dear [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Company understands that the Customer has requested the following modifications to the Original Connection Agreement:

- The MIC at the site will be increased to 190 MVA to accommodate a Data Centre at the site;

- [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] The Data centre which the Company understands the Customer will build at Huntstown, Co. Dublin will have an MIC of 190 MVA (the "Huntstown Data Centre"). [REDACTED]
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We look forward to hearing from you.

Yours sincerely,

DocuSigned by:

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Michael Mahon
Chief Infrastructure Officer
EirGrid plc.



www.eirgrid.com

The Oval, 160 Shelbourne Road
Ballsbridge, Dublin D04 FV28, Ireland

Telephone +353 1 677 1700

Email info@eirgrid.com

[REDACTED]
Huntstown Power Company Limited,
The Liberty Centre,
Blanchardstown Retail Park,
Dublin 15,
D15 YT2H

8th March 2021

Our ref: P28I(1)

Transmission Connection Agreement for [REDACTED]
[REDACTED] MIC of 190 MVA.

Dear [REDACTED],

We confirm your acceptance of the Transmission Connection Agreement signed between EirGrid and Huntstown Power Company Limited.

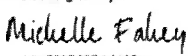
This Transmission Connection Agreement has been dated the 8th March 2021. Please find enclosed your copy of the countersigned Transmission Connection Agreement:

[REDACTED]

[REDACTED]

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[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Yours sincerely,

DocuSigned by

[REDACTED]
Michelle Fahey,
Customers and Connections
EirGrid plc





63 York Road
Dun Laoghaire
Co. Dublin

www.brockmcclure.ie

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

[via email]

14th February 2025

ABP Ref 313583-22 (FCC FW21A/0151)
Lands adjacent to Huntstown Power Station, Dublin 11

Dear Sir/Madam,

We refer to your letter dated 12th February 2025 which requested 'a verified copy of the Transaction Connection Agreement between Huntstown Power Company Limited and Eirgrid dated 8 March 2021, Ref, PL28L'.

The Transmission Connection Agreement contains extensive confidential and commercially sensitive information which Huntstown Power Company Limited is prohibited from disclosing. It has therefore been necessary to redact certain information from the documents provided.

Arthur Cox LLP have provided a side letter which confirms that they have verified that:

1. the original Transmission Connection Agreement, Offer Letter and Offer Acceptance Letter have been executed and are binding and effective, and
2. the copy redacted documents provided are true copies of the original agreements.

We have attached the following relevant documentation in response to this request:

Documents	Date	Appendix
Letter from Arthur Cox LLP	14 th February 2025	Appendix 1
Offer Letter from Eirgrid	01 st September 2020	Appendix 2
Offer Acceptance Letter	08 th March 2021	Appendix 3
Transmission Connection Agreement	08 th March 2021	Appendix 4

Transmission Connection Agreement - Document Overview:

- The Offer Letter, signed by EirGrid, provides that the original transmission agreement associated with Huntstown Power Company Limited would be amended to 'accommodate a Data Centre at the site' and increase the firm MIC of the site to 190MVA (see Page 2 of the Offer Letter). The MIC, or Maximum Import Capacity, represents the maximum amount of electricity that the data centre is permitted to use under the Transmission Connection Agreement;



- The Transmission Connection Agreement, signed by EirGrid and Huntstown Power Company Limited, stipulates that *'the Parties agree that the Offer Letter is incorporated into this Connection Agreement'*. The Transmission Connection Agreement is therefore predicated on the provisions of the Offer Letter;
- The Offer Acceptance letter, signed by EirGrid, demonstrates the acceptance of the Transmission Connection Agreement.

We note that the Board has requested this information to be submitted before 04th March 2025. However, given the extreme urgency in respect of this project, we have provided a response within two days. We request that the Board now proceeds to make a decision on this case. We trust that this satisfies your request and that a decision can now be swiftly progressed.

Yours sincerely,



Suzanne McClure

Brock McClure Planning & Development Consultants

suzanne@brockmcclure.ie

Office: 01 559 3859

ARTHUR COX

Arthur Cox LLP
Ten Earlsfort Terrace
Dublin 2
D02 T380

+353 1 920 1000
dublin@arthurcox.com
dx: 27 dublin

Dublin
Belfast
London
New York
San Francisco
arthurcox.com

14 February 2025

An Bord Pleanála
64 Marlborough Street
Dublin

Re: Ref. ABP-313583-22 - Request under Section 132
Our client: Huntstown Power Company Limited

Dear Sir / Madam

We refer to the above matter and to the Board's request issued to our client on 12 February 2024 under section 132.

The Board has sought "*A verified copy of the Transaction Connection Agreement between Huntstown Power Company Limited and Eirgrid dated 8 March 2021, Ref. P28L, referred to in your response dated June 2024.*"

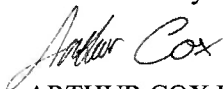
Given confidentiality obligations and the commercially sensitive nature of the Transmission Connection Agreement, our client is not at liberty to provide the agreement. We have therefore been asked to provide this letter in order to verify the copy of a Transmission Connection Agreement between EirGrid plc and our client. For the purpose of doing so, we have been provided with the:

1. fully executed Transmission Connection Agreement dated 8 March 2021;
2. Offer Letter dated 1 September 2020; and
3. Offer Acceptance Letter dated 8 March 2021.

We verify that the Transmission Connection Agreement was executed on 8 March 2021 and its terms, together with the Offer Letter and Offer Acceptance Letter, are effective and binding on EirGrid plc and our client such that EirGrid is legally obliged to connect the data centre to the Transmission System subject to the terms of the Transmission Connection Agreement.

We have also been provided with the redacted copy of the above documents submitted to the Board in response to its request and we have verified that the redacted documents are true copies of the originals.

Yours sincerely



ARTHUR COX LLP

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