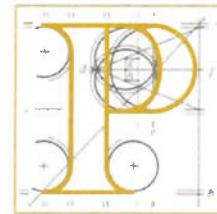


**Our Case Number:** ABP-319080-24



An  
Bord  
Pleanála

Commission for Regulation of Utilities Water, Energy  
The Grain House  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24  
D24 PXWO

**Date:** 01 March 2024

**Re:** Proposed transition and conversion of the existing 900MW electricity generating station from coal to heavy fuel oil and associated ancillary development at Moneypoint Generating Station, Moneypoint, Co. Clare. [www.moneypointsecurityofsupply.ie](http://www.moneypointsecurityofsupply.ie)  
Moneypoint Generating Station, Moneypoint, Co. Clare.

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.


The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PA09

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An Coimisiún  
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An Bord Pleanála Case Reference: PA03.319080

01 March 2024

**RE: Proposed transition and conversion of the existing 900 MW electricity generating station from coal to heavy fuel oil and associated ancillary development.**

Dear Sir/Madam,

I refer to the above referenced planning case. In accordance with Section 9 of the Electricity Regulation Act<sup>1</sup>, the Commission for Regulation of Utilities (CRU) wishes to submit the following observations related to electricity security of supply.

On 28 September 2021, the CRU published an Information Paper: Security of Electricity Supply – Programme of Actions<sup>2</sup>. This programme of actions is being implemented in response to the security of supply concerns as a result of the projected shortfall in generation capacity to meet future demand and to mitigate against such a shortfall.

Action 3 of the Programme of Actions sought to explore the possibility of extending the operational life of a number of older generation units on a temporary basis until new capacity has been delivered to replace them. The CRU published an update to this programme in October 2023 and that paper outlined that EirGrid commenced discussions with a number of parties, including the ESB in respect to the potential to retain the three Moneypoint Units (MP1, MP2 and MP3) on a temporary basis.

That paper also detailed that: *“In October 2023, following Direction from the CRU, EirGrid entered into a Services Agreement with ESB for the continued availability of the three (3) units at Moneypoint after their planned closure date for the provision of Security of Supply services on an out of market and temporary basis.”*

The CRU published a further paper on 17 October 2023 outlining the Services Agreement. The position of the regulator is that: *“The Agreement will contribute to reducing security of electricity supply risks while protecting customers and its provisions ensure that market distortion is minimised. The CRU has reached this conclusion, based on its analysis of the information provided to it, which demonstrates that the Agreement is cost effective and represents value for money in the context of the current risks to security of supply.”*

ESB has committed to cease burning coal at Moneypoint by the end of 2025, the Agreement in place is based on the use of Heavy Fuel Oil (HFO) from 2025 to 2029. Operating on HFO will increase the availability of the Moneypoint Units and reduce their carbon intensity when compared to coal operation while also retaining fuel diversity on the Island of Ireland. The

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<sup>1</sup> Section 9 of the Electricity Regulation Act 1999 sets out the CRU's functions including the requirement to promote the continuity, security and quality of supplies of electricity.

<sup>2</sup> Security of Electricity Supply Programme of Actions



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Commission for  
Regulation of Utilities

Agreement is temporary in nature and only allows the Moneypoint Units to run for security of supply reasons as generators of last resort as directed by EirGrid.

The retention of the Moneypoint Units and conversion to HFO is in line with current Government policy including the 2021 Policy Statement on Security of Electricity Supply<sup>3</sup> in which the Government approved that, *“existing electricity generation capacity, including existing coal, heavy fuel oil and biomass fired generation, should be retained until the new conventional electricity generation capacity is developed in order to ensure security of electricity supply.”* This action is also in line with the Energy Security in Ireland to 2030 Package<sup>4</sup>, published in November 2023, which commits to implementing the Security of Supply Programme of Actions.

Yours sincerely,

John Melvin

Director – Security of Supply and Wholesale

(Sent by email – no signature required)

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<sup>3</sup> Policy Statement on Security of Electricity Supply

<sup>4</sup> Energy Security in Ireland to 2030