

Jonathan Dunne

From: O Connor, Peter <peter.oconnor@aecom.com>
Sent: Monday, September 22, 2025 2:43 PM
To: Ellen Moss; SIDS
Cc: Martin Ahern; Kieran O'Connor; Devine, Rachel
Subject: Re: ABP-322568-25
Attachments: ABP-322568-25_Applicant Letter 22092025.pdf

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Dear Ms. Moss,

Please find attached correspondence in relation to: **ABP-322568-25 – Shannon LNG Limited (the “Applicant”): 10 year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works (the “Proposed Development”).**

Regards,

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Ellen Moss
Executive Officer
SIDS, An Coimisiún Pleanála
64 Marlborough Street, Dublin 1, D01 V902

ABP-322568-25 – Shannon LNG Limited (the “Applicant”): 10 year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works (the “Proposed Development”). Response to ACP Correspondence dated 26 August 2025

Dear Ms Moss,

Shannon LNG Limited acknowledges An Coimisiún Pleanála’s (the “Commission”) correspondence dated 26th August 2025 enclosing a submission from the Minister for Climate, Energy and the Environment (the Minister) dated 5th August 2025.

We note the Minister’s submission and confirmation that as of 04 March 2025, the review of Ireland’s energy security review (the “SOS Review”) is now completed and further, that the 2021 Policy Statement on the Importation of Fracked Gas no longer remains in place.

We acknowledge that neither the completion of the SOS Review nor the Minister’s submission dated 05 August 2025 objects to, nor prohibits, the Proposed Development. In fact, we welcome the completion of the SOS Review, as set out in the Applicant’s submission dated 01 August 2025 and the Minister’s submission dated 05 August 2025 which acknowledges the pressing requirement for LNG imports.

We note the Minister’s comments that the *“Government is committed to taking decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050”*.

In this regard, we refer the Commission to subsection 5 of the Applicant’s submission dated 01 August 2025 which demonstrates why granting permission for the Proposed Development is in accordance with the Commission’s obligations under section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) (the “Climate Acts”). We do not repeat that analysis here and instead invite the Commission to consider the full extent of the Applicant’s submission dated 01 August 2025, to assist with the assessment of this application.

The key driver for the Proposed Development is a need to diversify gas supply points, to obviate risk of a failure in the existing Moffat interconnectors. In this regard, the Proposed Development provides the necessary flexible transition fuel capacity required by the State, and as identified in the Climate Action Plan, to support Ireland’s legally binding emissions budgets. The Proposed Development is therefore a key enabler to achieving *“a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050”*.

The Commission will be aware that the Proposed Development will act as a new supply point and will not increase demand nor reliance on fossil fuels. The Proposed Development will only supply gas when there is a demand for it and can only operate where there is a response to end-user demand. As such, gas supply capacity, including the Proposed Development, does not create more demand for, nor increase reliance on, fossil fuels. By offering a market-responsive supply source, without creating new demand, the Proposed Development advances Ireland’s decarbonisation goals in full conformity with both the Climate Action Plan and the Commission’s obligations under the Climate Acts.

In this regard, we refer the Commission to § Section 3.1 of the Applicant’s response to its request for further information submitted on 12 June 2023 that *“Ireland’s natural gas demand is determined by electricity demand, residential growth, industrial demand, fuel prices, GDP and the weather. It is not determined by supply capacity”*.

However, we summarise further one practical point of market design to show that the Proposed Development will not increase reliance on fossil fuels. On the contrary, it will play an important role in supporting Ireland’s climate objectives.

Why a new gas supply point does not increase gas demand or CO₂ emissions

In Ireland, the sale and supply of natural gas, including LNG, is set by law. It is regulated² by the Commission for Regulation of Utilities (CRU). By law, only specific licensed companies called Natural Gas Suppliers ("Suppliers"), can sell natural gas. Examples³ of licenced Suppliers are Bord Gáis Energy, Energia, Electric Ireland, and SSE Airtricity. If a customer, i.e. a home, business or power plant, wants natural gas, they can only buy it from a Supplier.

Separately, GNI run the pipeline system. GNI are a licenced Transmission System Operator (TSO). GNI never own the gas, they just manage the gas pipes and follow instructions from Suppliers.

This separation of pipeline ownership and gas supply, called "unbundling", is a core principle of EU law. Unbundling allows new gas supply infrastructure, such as LNG terminals the right to connect and access the GNI network. It also allows the various Suppliers unrestricted access and use of the GNI network. Unbundling therefore increases security of supply and lowers prices by giving customers a choice of Suppliers, who compete on price and service.

There are also important technical realities. Specifically, customers gas demand changes throughout the day. For example, Ireland's largest gas consumers: natural gas power plants, who consume about 60% of the natural gas. Under Ireland's Climate Action Plan, natural gas power plants are only allowed operate in support of renewable (wind) generation⁴. This means when the wind falls off, or increases, Eirgrid will instruct each gas power plant to turn on or turn off respectively. Eirgrid issues these instructions every hour. As power plants cannot store natural gas, they are completely reliant on their Supplier to respond to their demand every hour. In turn, Suppliers tell GNI how much gas they need every hour. These instructions are called nominations. If customers do not need gas, no nominations are made, no gas flows, and no emissions occur⁵.

The other technical point that is relevant is the GNI pipelines cannot provide meaningful gas storage. The gas network is essentially a large pipe with a fixed volume. Gas cannot be introduced (supplied) into the pipe unless there is available space. Space is only created when gas exits the pipe. For this reason, under the regulated rules of the network⁶, GNI require that the system be balanced at the end of each gas day. This means that the volume of gas supplied into the network must equal the volume taken out, a net zero position. If Suppliers nominations are inaccurate and the system is imbalanced because of their actions, GNI will impose a penalty charge. This physical limitation of the pipeline system, and the associated financial charges, ensure Suppliers must match supply to demand.

The key point of all the above is, under EU and Irish laws and regulations, and the physical limitation of the pipeline network, supply can **only** respond to demand. Gas cannot be supplied into Ireland without demand. Having more supply capacity available does not create more demand and will not increase reliance on fossil fuels.

The above explanation is a high-level summary of the many legal rules and operational requirements concerning gas sales and transportation. The Applicant would be pleased to provide a more detailed and comprehensive explanation of these matters should the Commission wish, by way of a further Request for Information. But this summary position is confirmed by the Sustainable Energy Authority of Ireland's (SEAI) [Energy in Ireland 2024 Report](#) which notes at §9.1 that:

"Energy supply responds to the level of demand for energy services (heating, transportation and electricity) and how end users want that energy demand satisfied. Energy service demand is driven primarily by economic activity and by the energy end-use technologies employed in undertaking such activity."

It is also confirmed by GNI in their [Methodology for forecasting gas demand](#)⁷, which notes that gas demand is solely driven by the power generation, residential, and industrial/commercial sectors. GNI confirm the availability of supply capacity does not influence the level of demand.

[SEAI's National Energy Projections](#), which are modelled using the Irish Government's National Energy Modelling Framework (NEMF), also confirm that natural gas supply is not a factor in Ireland's emissions⁸.

The planned Shannon LNG Terminal is simply a new supply point, which will work the same way as the UK supply point. It will only send out gas if customers need it and the space is available in the pipeline network. It will play a central role in delivering Ireland's renewable generation targets and be a key enabler to achieving Ireland Climate Plans.

Indeed, the Applicant's LNG terminal may result in lower CO₂ emissions. That's because GNI report⁹ ([Sustainability report, 'Sustainability in Action'](#)) their compressors in Scotland emit about 100,000 tonnes of CO₂ annually to push gas across to Ireland from the UK. This includes direct venting of methane to the atmosphere. But the Government's analysis in the [Security of Supply Review](#) confirms that an FSRU, just like the Applicants, will emit about 30% less CO₂ than supply from Scotland (about 70,000 to 80,000 tonnes CO₂ per year)¹⁰. The Government further note that the:

² The detailed process can read here: CER/08/187 Process for entry to the Irish Retail Gas Market, Commission for Regulation of Utilities (previously Commission for energy regulation)

³ The complete list of Suppliers can be found here: [Energy Suppliers in Ireland](#) – Commission for Regulation of Utilities.

⁴ As discussed in Section 13 (Climate) of the EIAR,

⁵ The customer site is of course where the emissions are released, and where it is accounted for section 15 of the Climate Action and Low Carbon Development Act, 2015

⁶ Under a Code of Operations, which is a regulated "rule book" that Shippers and Suppliers must adhere to.

⁷ <https://www.gasnetworks.ie/sites/default/files/docs/corporate/company/Gas-Forecasting-Methodology-Report.pdf>

⁸ See Appendix 3: Input assumptions for National Energy Projections (appendix 3).

⁹ Gas Networks Ireland's 2023 sustainability report, 'Sustainability in Action'.

¹⁰ 4.2.1. Sustainability: Option 1 – commercial FSRU. Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems The Department of the Environment, Climate and Communications. April 2023. Final Report.

“The importation of LNG to Ireland may not necessarily result in additional material environmental impacts on a global basis, especially given the size of the Irish gas market relative to global LNG production. For example, the introduction of direct LNG imports to Ireland is unlikely to lead to a global increase in LNG production and transport. Instead, we would expect that direct imports of LNG to Ireland would reduce LNG shipments to other markets (e.g., to GB or to other north-western European countries).”

In line with Section 15, the Commission must, so far as practicable, perform its functions in a manner consistent with the most recent Climate Action Plan, the national long-term climate strategy, the national climate objective and the mitigation/adaptation objectives. The proposed Shannon LNG Terminal meets that standard because it is purely demand-led, gas can only flow when licensed Suppliers nominate in response to end-user demand. It does not increase fossil fuel consumption but instead ensures security and flexibility for a power system that prioritises renewables and needs fast, reliable balancing.

The Applicant is available to respond to any further requests for information that the Commission may require in relation to the Proposed Development.

Please acknowledge receipt of this submission.

Yours sincerely,



Peter O'Connor
Technical Director, AECOM
Impact Assessment Lead Ireland

Cc Martin Ahern, Shannon LNG