



Ireland Electrified Submission to feed into the Pre-Legislative Scrutiny process of the Private Wires Bill 2025

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Re: Ireland Electrified Submission to feed into the Pre-Legislative Scrutiny process of the Private Wires Bill 2025

1. Introduction

Ireland Electrified welcomes the opportunity to respond to the Joint Committee on Committee on Climate, Environment and Energy to provide input for the Pre-Legislative Scrutiny process of the Private Wires Bill 2025.

2. Who we are

Ireland Electrified is a trade association promoting the electrification of heat, industry, and transport. We believe that electrification is the most effective and efficient path to achieving Ireland's climate goals, strengthening energy security, stabilising energy costs, and reducing our reliance on fossil fuels. We represent energy users, suppliers and electrification solution providers.

3. Industry Feedback

We support the overall policy intent of the Private Wires Bill and consider it to be well aligned with key Government strategies, including the Climate Action Plan, the National Energy Demand Strategy, the Large Energy Users Action Plan (LEAP), and the emerging Green Energy Park framework. These strategies consistently emphasise the need to accelerate the electrification of industrial heat, improve demand-side flexibility, reduce renewable curtailment, and enhance Ireland's competitiveness for energy-intensive and electrifying sectors.

The Bill takes an important step in enabling direct connections between renewable generation and demand, creating a pathway to use surplus wind and solar electricity productively for heat and transport electrification rather than curtailment. In doing so, it supports sector coupling, understood as the coordinated use of electricity to decarbonise transport, heating and industry by linking energy systems that have traditionally been planned and operated separately. It also supports the deployment of dispatchable and hybrid electrification solutions by large energy users, allowing flexible loads to respond to grid conditions and support system efficiency, while maintaining system integrity through CRU oversight.

Our suggested tweaks are intended to build on this strong foundation by ensuring that the Bill more explicitly recognises the system value of flexibility and dispatchable electrification, in line with stated Government policy objectives.

We are keen to engage with the Joint Committee on Committee on Climate, Environment and Energy and other relevant stakeholders on the initiatives outlined in the Private Wires policy statement and our members have put together the following feedback which we would be more than happy to discuss with you.

Head 7(2)

We support the intent of Head 7(2) but note that, if interpreted narrowly, industrial campuses and shared electrification infrastructure could fall into a regulatory grey area. **We suggest clarifying in Head 7(2) that permissions may apply to “...shared or multi-user electrification infrastructure supporting industrial heat, district heating, or clustered energy demand”.** This would provide certainty for industrial heat hubs, green energy parks, circular economy heat reuse, district heating electrification and energy communities, while not expanding statutory rights or weakening regulatory oversight. Such clarification would be consistent with Action 16 of the Large Energy Users Action Plan, which supports innovation in energy management and storage, and Action 14, which seeks to facilitate direct engagement with regional Green Energy Park proposers.

Head 7(3)

In light of the technical and operational considerations associated with on-street electric vehicle charging, particularly where higher-power or shared-use solutions are required, we would encourage consideration of a more coordinated delivery approach across relevant bodies.

As currently drafted, responsibilities relating to approval, network notification and regulatory reporting are distributed across local authorities, ESB Networks and the CRU. While each role is appropriate, there is a risk that addressing these elements sequentially could lead to duplication of effort, extended timelines, or uncertainty for applicants.

We therefore suggest that a more joined-up framework, such as a coordinated taskforce or shared delivery process, could support earlier alignment on technical feasibility, public realm considerations and regulatory requirements. This approach would help streamline decision-making, reduce delays and support the timely roll-out of on-street charging infrastructure that is practical, scalable and aligned with user needs.

Head 7(4)(a)

We support the approach set out in Head 7 and its focus on ensuring that private wire projects are assessed in the public interest. However, the Bill currently frames this assessment primarily around renewable generation linkage and does not explicitly recognise the system value of flexibility, sector coupling, or curtailment reduction.

We suggest clarifying Head 7(4)a to allow the CRU, as part of its licensing assessment, to consider whether a project would “promote renewable, sustainable or alternative energy and/or enhance flexible electrification of heat and transport, demand response capability, sector coupling, or the capacity of the project to reduce renewable curtailment or dispatch-down”. This would ensure that private wire proposals are assessed not only on their connection to generation, but also on their wider system value, better reflecting the contribution of technologies such as electrified and hybrid industrial heat, district heating, smart EV charging, thermal storage and demand-side response, in line with Government policy, and, where technically feasible, their ability to support wider system balancing and flexibility objectives.

Head 7(10)

We note that Head 10 correctly provides that private wire licence holders will not be granted statutory wayleave or compulsory purchase order rights. We support this position. However, further clarity would be helpful regarding the applicable policy and processes for routing private wires through public or shared spaces, including across or along public roads. **In particular, clarity on the role of local authorities, alignment with existing road-opening and licensing procedures, and consistency of approach across local authorities would help ensure that projects can proceed in a timely and predictable manner.** This would provide practical certainty for developers while maintaining appropriate landowner protections and regulatory oversight.

Head 7(11)

We recognise the importance of retaining a limited step-in power in the interests of public safety where a private wire licence holder is genuinely unable to decommission or remove infrastructure. However, the proposed step-in right may raise concerns for project developers and infrastructure funders if the circumstances and process for its exercise are not sufficiently clear. **In particular, further clarification would be helpful on the steps required before any step-in right is exercised, including whether funders or affiliated entities would have an opportunity to address decommissioning or remediation issues before the Board steps in.** Providing this clarity would help preserve investment certainty while maintaining the intended public safety safeguards.

Head 8

We support the inclusion of a statutory review mechanism in Head 8, recognising that the policy statement underpinning the Bill explicitly commits to monitoring industry developments, including the emergence of green energy parks and renewable energy communities, and to considering any future need for further liberalisation.

Given the pace of change in the energy system, we suggest that the initial review be brought forward to five years after commencement, with subsequent periodic reviews thereafter. This would allow early learning from deployment, ensure alignment with evolving EU energy market reforms, and enable timely assessment of whether the legislation is sufficient to support emerging use cases such as green energy parks and renewable energy communities.

4. Conclusion

We welcome the opportunity to provide input to the Joint Committee on Climate, Environment and Energy as part of the pre-legislative scrutiny of the Private Wires Bill 2025. We support the Bill as a prudent and forward-looking reform and believe that, with a small number of targeted clarifications recognising flexibility, sector coupling, and the dispatchable electrification of heat and transport, it can more fully deliver on its potential to support Ireland's energy transition. We would be happy to engage further with the Committee to discuss our comments and recommendations.

Yours sincerely,

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