POLICY DISCUSSION PAPER

Reconciling Ireland’s AI Ambition with its Climate and Electricity-Grid Limits

A sector-level analysis of grid headroom, the CRU connection regime, and Ireland’s regulated-AI opportunity under CADA

Ireland need not choose between its AI and data-centre investment ambition and its grid and climate limits. EirGrid records roughly 2,300 MW of contracted data-centre capacity against about 800 MW of actual peak demand — a large block of already-contracted headroom. As the EU’s Cloud and AI Development Act moves to triple European data-centre capacity, Ireland's defensible position is not raw hyperscale buildout it cannot power, but regulated, sovereignty-anchored AI inference hosted inside the grid envelope it already holds.

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EXECUTIVE SUMMARY

In brief

Ireland does not need to choose between AI/data-centre ambition and its grid and climate constraints — but the way through is narrower than it looks. EirGrid reports roughly 2,300 MW of demand capacity contracted to data centres *and other new technology loads* against a coincident peak data-centre demand of about 800 MW. A large block of contracted capacity is therefore undrawn. It is not, however, free.[1]

The pressure is intensifying. The CSO's release of 7 July 2026 puts data centres at **23% of metered electricity in 2025 (7,663 GWh)**, up 10% year-on-year against 2% for all other users. Large Energy Users now account for 33%. Data centres consume more electricity than all urban households combined.[2]

Drawing the headroom is precisely the scenario the system operator is trying to manage. Four documented transmission faults have caused large demand facilities to shed load within milliseconds — on 8 May 2025, 387 MW, or 52% of data-centre demand at that moment. EirGrid models potential imbalances above 1,150 MW against a long-standing planning maximum of about 500 MW. Filling contracted headroom with load that cannot ride through a fault is not a costless path around the constraint; it is the constraint.[1]

Which makes fault-ride-through compliance the key, not an obstacle. The lever that converts stranded contracted capacity into usable AI capacity is engineering the incremental load to ride through faults. Compliant load can grow within its contractual limit; non-compliant load cannot, however much headroom sits unused. Ireland's defensible niche remains regulated, sovereignty-anchored inference — hosted inside existing connections, and engineered to be grid-compliant.[3]

FINDING 1

A large block of contracted capacity is undrawn — but the figure needs careful reading

EirGrid and SONI's *Large Demand Facility Fault Ride-Through Issue and Proposed Solutions* (MPID345 Information Paper, v2.0, 17 November 2025) is the cleanest public source on the gap between contracted capacity and actual peak draw. In Section 2.1, EirGrid states verbatim:[1]

> *"The peak data centre demand to date is approximately 800 MW; approximately 650 MW connected on the transmission system and 150 MW on the distribution system. In Ireland, there is approximately 2000 MW of demand capacity that is contracted to data centres and other new technology loads at the transmission level, and approximately a further 300 MW contracted at the 110 kV distribution level."*

What the figure does — and does not — tell us

Two qualifications must be made at the outset, because the comparison is not like-for-like and the paper's argument should not rest on pretending otherwise.

First, the contracted figure is a mixed category and no breakdown is published. The ~2,300 MW is contracted to "data centres *and other new technology loads*" — a class EirGrid uses to capture power-electronic-interfaced demand, including prospectively electrolysers and electric-vehicle charging infrastructure. Neither EirGrid, the CRU, ESB Networks, the CSO nor the SEAI has published a disaggregation of that figure by load type. **This is a material gap in the public record and we flag it as such.** The strongest available indication of composition is internal to EirGrid's own analysis: its MPID345 modelling describes the same 2,000 MW as approximating "the currently contracted data centre demand," which implies data centres are the dominant component and the non-data-centre residual is modest. That is an inference, not a published fact, and the paper treats it as such.[1]

Second, ~800 MW is a coincident peak, not a nameplate sum. Setting a mixed-category contracted figure against a single-category coincident peak overstates the headroom available to data centres specifically. The honest statement is that **a substantial block of contracted capacity is undrawn, most of it data-centre capacity** — not that precisely 1,500 MW is available for AI inference.

Legacy heavy industry sits outside this figure entirely and should not be netted into it. Aughinish Alumina, Ireland's largest single industrial energy user, operates its own on-site combined heat and power plant and is a net exporter to the grid; it is caught by the scope of the proposed fault-ride-through rule as a transmission-connected demand facility, but it is not a "new technology load" and forms no part of the contracted cohort above. Grid-scale storage is likewise outside it: batteries are treated as generation and storage rather than demand facilities, so their charging load is not

counted as contracted demand capacity of this type.[19]

The consumption trend, refreshed

The CSO's *Data Centres Metered Electricity Consumption 2025*, published 7 July 2026, supersedes earlier figures and sharpens the picture considerably.[2]

Metric	2024	2025
Data-centre share of metered electricity	22%	**23%**
Data-centre consumption	6,973 GWh	**7,663 GWh**
Year-on-year growth, data centres	—	**+10%**
Year-on-year growth, all other users	—	**+2%**
Large Energy User share	31%	**33% (10,812 GWh)**
All residential dwellings	—	**27% (urban 18%, rural 9%)**

Data centres now consume more electricity than every urban household in the State combined. Consumption tripled between 2019 and 2025, from 2,490 GWh to 7,663 GWh. EirGrid forecasts a further rise to 14.6 TWh by 2034 — approximately 31% of national demand.[23]

> **Why this matters more than it appears.** The undrawn capacity is contractually real. But it is not idle capacity waiting to be switched on at no cost to the system. As Finding 2 sets out, the act of drawing it upward is precisely the scenario the transmission system operator is currently trying to manage — and the condition on which it can be drawn is a technical one.

FINDING 2

The headroom is contractually real but operationally locked — and fault-ride-through compliance is the key

This is the finding that most changes how the opportunity should be understood, and it cuts against a simple "free capacity" reading of the numbers above.

The documented problem

Large data centres do not behave like conventional loads during a grid fault. Their power-electronic front ends detach from the network within milliseconds of a voltage dip and switch to on-site backup, which the system sees as an instantaneous loss of demand. EirGrid has documented four such events: Killonan–Kilpaddoge (7 January 2022, 74 MW, 16% of data-centre demand at the time); Kellystown–Woodland (13 December 2022, 204 MW, 34%); the Poolbeg Reactor event (26 January 2025, 321 MW, 44%); and North Wall–Poolbeg (8 May 2025, **387 MW — 52% of all data-centre demand at that moment**).[1]

The trajectory is the point. Each event has been larger than the last, in both absolute and proportional terms. EirGrid's modelling indicates that as contracted demand is drawn upward toward 2,000 MW, consequential imbalances **could exceed 1,150 MW** — against a long-standing planning maximum of roughly 500 MW. Notice what the figures are measured against: demand *at that moment*, not contracted capacity. The risk scales with what is actually being drawn.[1]

The consequence for the headroom thesis

It follows that filling contracted headroom with load that cannot ride through a fault is **not a costless path around Ireland's grid constraint. It is the constraint.** Any claim that additional inference load inside existing connections is "grid-neutral" cannot survive contact with EirGrid's own analysis, and this paper does not make it.

The corollary, however, is the constructive one. If the risk is a function of *non-ride-through-capable* load, then the lever that converts stranded contracted capacity into usable capacity is **engineering the incremental load to be fault-ride-through compliant**. Compliant demand can grow within its contractual limit. Non-compliant demand cannot, however much headroom sits unused on paper. Compliance is not an obstacle to the opportunity; it is the mechanism that unlocks it.

The reframe. Ireland does not have 1,500 MW of free grid capacity for AI. It has a large block of contracted capacity that is currently unusable for system-stability reasons, and a clear technical route to making it usable. The national interest and the commercial interest point the same way: the compute that Ireland can safely host is the compute that is engineered to hold the grid up rather than drop off it.

A regime still in draft — and why the argument does not depend on it

EirGrid has proposed a Grid Code modification (MPID345) requiring demand facilities to remain connected through faults and to restore at least 90% of their *pre-fault active power demand* within 500 milliseconds — a standard measured against actual draw, not contracted capacity. It was recommended to the CRU on 1 April 2026 with an accompanying compliance and derogation framework, under which non-compliant demand would be capped in actual MVA terms regardless of unused contractual headroom. **As at the date of publication the CRU has not decided on it. The modification is proposed, not in force, and its final shape may change.**[120]

The argument in this paper does not depend on the outcome. The four fault events happened. The stability limit is documented by the system operator and is not in dispute. If MPID345 is approved, compliance becomes the explicit condition of growth. If it is amended or refused, EirGrid must still manage the same constraint through connection offers, operational limits or a redrafted rule — because the physics is unchanged. Either way, the compute Ireland can host is compute that rides through faults. The regulatory instrument is a variable; the engineering requirement is not.

FINDING 3

The CRU framework: “bring your own capacity” for new applicants, grandfathered existing connections

CRU Decision Paper *CRU/2025/236 — Large Energy Users Connection Policy* was published on 12 December 2025, superseding CRU/21/124 (November 2021) which had effectively paused new Dublin data-centre connections.[4]

- **De-minimis threshold: 1 MVA**, with a CRU warning against “project splitting”.
- **1 MVA to <10 MVA:** an autoproducer meeting 100% of site capacity on a de-rated basis, participating in the Single Electricity Market.
- **≥10 MVA:** new onsite or proximate dispatchable generation and/or storage, separately connected and metered, de-rated capacity at least equal to Maximum Import Capacity, ramped in step with demand.
- **Renewable additionality:** at least 80% of annual demand met with *additional* Irish renewable generation — new or fully repowered projects outside REFIT, RESS and ORESS — on a six-year glide path.
- **Grandfathering:** the policy applies to applications submitted after 12 December 2025. Pre-existing applications continue under CRU/21/124.

The System Operators have now published their engagement and connection processes — EirGrid’s Data Centre Connection Offer Process and Policy (DCCOPP) Version 3, published 20 May 2026 — with applications tiered by Maximum Import Capacity (below 1 MVA de minimis; 1–10 MVA; and 10 MVA and above). EirGrid’s *Data Centre Constrained Area Overview* (May 2026) confirms that **Dublin is currently entirely constrained**.[5]

One structural detail carries more weight than its technicality suggests. EirGrid takes transmission demand connections at or above roughly 20 MVA; below that, connection is at distribution level via ESB Networks. The proposed fault-ride-through obligation binds *transmission-connected* facilities, and a Distribution Code equivalent — with its own threshold — **has not yet been developed**. For the lighter, more distributed inference deployments this paper argues Ireland is best suited to host, the governing regime is therefore not yet written. That is an argument for engaging now, while it is being drafted, rather than after.[520]

One material qualification must be stated plainly, because it is central to the first of this paper’s recommendations. The CRU connection policy is **under judicial review**. Leave was granted by the High Court on 28 April 2026 (Record No. 2026/335 JR) to three applicants — Friends of the Irish Environment, Friends of the Earth Ireland and ClientEarth — challenging the regime on climate-obligation grounds arising from its onsite dispatchable-generation requirement and non-renewable allowance. **The policy remains in force; no stay has been reported**, and a hearing is reportedly scheduled for 2027. Critically, EirGrid published DCCOPP V3 *after* leave was granted and flagged that the rules may change depending on the outcome of the proceedings, with applicants proceeding in the interim at their own risk. That the System Operator itself cannot yet offer settled rules is the strongest available argument that formal

regulatory guidance — not implicit comfort — is what a prospective inference operator needs.[5][18]

This matters for the densification argument. Any AI inference workload hosted inside an *existing* connection agreement avoids the full marginal compliance stack imposed on new applicants under the December 2025 regime. Subject always to the fault-ride-through condition set out in Finding 2, the economics of utilising currently-undrawn contracted capacity are materially better than greenfield buildout — and in Dublin, greenfield is currently not an option at all.

The **Large Energy User Action Plan (LEAP)**, Cabinet-approved 13 January 2026, introduces a plan-led model with Green Energy Parks co-locating large users with new renewable generation, and commits to private-wires legislation. The General Scheme of the Private Wires Bill has been approved for drafting. CRU Price Review 6 approved €13.8bn of network allowances for 2026–2030.[6]

FINDING 4

The climate constraint is binding and quantified

The EPA's greenhouse-gas projections of 27 May 2026 are unambiguous: even with full policy implementation, Ireland can achieve reductions of **up to 25% by 2030** against a statutory national target of 51%. The second carbon budget (2026–2030) is projected to be exceeded by **53–82 Mt CO_2eq**. Ireland is projected to miss its EU Effort Sharing target of 42%, achieving at most 23%.[7]

The EPA's provisional inventory of 8 July 2026 offers one point of relief: emissions fell 2.2% in 2025 and are now 14.5% below 2018 levels, and Ireland stayed *within* the first carbon budget (2021–2025) by 1.1 Mt CO_2eq. That headroom was slender and non-recurring; the second budget is the one now projected to be breached.[8]

The tension is direct and well-documented: growth in data-centre electricity demand has approximately matched or exceeded growth in renewable generation since 2017. Any strategy that adds large volumes of new grid load, however clean on paper, collides with a carbon budget that is already projected to be breached. **This is why densifying inside existing connections — rather than breaking ground on new ones — is not merely commercially attractive but climatically necessary, and why the fault-ride-through condition set out in Finding 2 is the price of doing it safely.**

Wind dispatch-down rose from 10.7% in 2023 to 14.0% in 2024. Time-matched inference — compute scheduled into windy or low-net-load periods — therefore has a genuine climate-positive argument that requires no greenfield grid investment.

FINDING 5

CADA: the EU moves to triple capacity — and why that strengthens, not weakens, Ireland's case

On 3 June 2026 the European Commission published the **Cloud and AI Development Act (CADA)** as the centrepiece of its Tech Sovereignty Package. Its headline commitment, in the Commission's own words, is to **at least triple the EU's data-centre capacity within the next five to seven years**.[12]

At first reading a tripling target appears to cut against everything argued above. It does not. CADA's instruments reward exactly the path Ireland is constrained into:

- **Data Centre Acceleration Zones.** Each member state must designate at least one within six months, with an explicit *brownfield preference* and *grid-availability screening* — favouring existing sites with existing connections over new-build on constrained networks.
- **Mandatory sustainability KPIs.** Standardised EU efficiency and sustainability reporting for operators, rewarding high-utilisation, well-sited capacity over raw expansion.
- **A cloud-sovereignty framework** of four Union assurance levels tied to public-sector procurement, with a "Union added value" procurement criterion.

Ireland cannot win a European buildout race it has no megawatts to enter. Dublin is fully constrained; the carbon budget is already projected to be breached; new connections carry a dispatchable-generation and renewables-additionality burden that greenfield hyperscale cannot easily absorb. What Ireland *can* do — and what CADA explicitly credits — is deliver **sustainable, grid-available, sovereignty-assured capacity in brownfield locations with connections already granted**. That is not a consolation prize. Under CADA's own scoring, it is the preferred model.

The strategic reframe. CADA turns Ireland's binding constraint into a qualifying credential. A member state that expands capacity by densifying existing, well-connected, high-efficiency sites — rather than by breaking ground on constrained grid — is delivering precisely the "sustainable capacity" CADA is designed to reward. Ireland should say so, loudly, during its Presidency.

FINDING 6

The regulatory foundations are now in place

The EU AI Act, as amended

The **Digital Omnibus on AI** is now adopted — approved by the European Parliament on 16 June 2026 and by the Council on 29 June 2026. It defers Annex III stand-alone high-risk obligations to **2 December 2027**, Annex I embedded high-risk obligations to **2 August 2028**, and Article 50 watermarking to **2 December 2026**. National sandboxes move to 2 August 2027.[9]

The distinction matters. Prohibited-practice bans have applied since 2 February 2025; what lands on **2 August 2026** is the **enforcement architecture** — penalty powers and the designation of market-surveillance authorities — together with Article 50 transparency obligations other than watermarking (deferred to 2 December 2026). The Omnibus is a recalibration, not a retreat, and the compliance perimeter it defines still routes through national competent authorities.

Ireland's implementing architecture

The **Regulation of Artificial Intelligence Bill 2026** was published on 17 June 2026 (139 sections, 10 parts, 4 schedules), superseding the February General Scheme. It completed all Dáil stages by 30 June and is in Seanad Committee Stage. It establishes the **AI Office of Ireland** — *Oifig IS na hÉireann* — **due to be operational from 1 August 2026 on enactment**, coordinating fifteen competent authorities designated under S.I. No. 366 of 2025, including the Central Bank of Ireland for financial services and the Data Protection Commission for data protection.[10]

One live question should be noted, and it is a subtler one than it first appears. The Bill does **not** designate the AI Office as a Market Surveillance Authority — a deliberate change from the February General Scheme. Frontline investigation and enforcement rest with the fifteen sectoral authorities; the Office's functions are coordinating and facilitative. It is the single point of contact, the operator of the national register, and the body that will *establish and run the regulatory sandbox*. Its leverage is coordinative, advisory and reputational rather than coercive.[11]

That distinction matters for how the Office's placement should be assessed. The Oireachtas Joint Committee on Artificial Intelligence, in its Second Interim Report of 9 June 2026, recommended that the Office be established outside the Department of Enterprise, Tourism and Employment as a fully independent agency with its own budget and technical staff; the Bill, published eight days later, did not adopt that. The question this raises is not whether an *enforcer* can credibly sit inside the department charged with attracting the investment it polices — the Office is not the enforcer. It is whether the Office's *regulatory* functions sit comfortably there: coordination sets the tone for fifteen authorities, and the sandbox is precisely where regulatory latitude is granted to innovators. Those are the functions on which a jurisdiction's reputation for even-handedness is built or lost, and they are the ones now housed within an enterprise-promotion department.[11]

A related legal question is unresolved. Article 70(2) of the AI Act requires the single point of contact to be a Market Surveillance Authority. The Bill preserves the Office's single-point-of-contact role while declining to designate it as an MSA — a tension that Ireland will have to resolve, and one worth watching as the Bill completes its passage.[11]

DORA and the financial-services perimeter

DORA (Regulation (EU) 2022/2554) has applied since 17 January 2025, imposing binding ICT third-party risk obligations on EU financial entities and direct oversight of critical ICT third-party providers, explicitly including cloud platforms. Ireland transposed it via S.I. 20/2025 with the Central Bank as competent authority. Because Ireland is the EU-passporting domicile of choice for much of European financial services, and because the Central Bank is the designated market-surveillance authority for AI in that sector, **the AI/financial-services regulatory perimeter routes through Dublin**. This is the structural foundation of the regulated-AI demand pillar, and the Digital Omnibus explicitly preserved national-authority competence for financial institutions.[13]

FINDING 7

The geopolitical layer: Pax Silica and the compute-sovereignty settlement

Two distinct developments are often conflated and should not be. **CADA is EU legislation** — a proposed Regulation now entering the ordinary legislative procedure. **Pax Silica is a United States initiative** — launched by the US State Department in December 2025 as an AI, semiconductor and critical-minerals supply-chain coalition.[14]

At the second Pax Silica Summit on 25–26 June 2026, ten new partners signed the Declaration, **including the European Union**, bringing membership to twenty-four. EU member states approved the signing on 8 June 2026 and the Commission signed on the Union's behalf.[14]

The significance for Ireland is that the compute-sovereignty settlement now has two mutually reinforcing layers: an internal EU capacity-and-sovereignty instrument (CADA) and an external supply-chain alignment (Pax Silica). Ireland sits inside both. A jurisdiction that hosts regulated, sovereignty-assured inference for EU financial services — under Irish competent authorities, on EU soil, within an EU-aligned supply chain — occupies a position that is difficult to replicate and that neither raw capacity nor low tax alone can secure.

FINDING 8

Where Ireland fits: inference, not frontier training

The EU's InvestAI programme earmarks €20bn for four to five AI gigafactories, each bringing together over 100,000 advanced AI processors, with the legal basis established by Council Regulation (EU) 2026/150 of 16 January 2026. The informal call drew approximately 76 proposals across sixteen member states. Ireland hosts an AI Factory *Antenna* — a support node — not a Factory, and no confirmed Irish gigafactory bid has been identified.[15]

This is the correct outcome. Frontier training is power-hungry, latency-insensitive and gravitates to cheap firm power. Ireland has none of those advantages and a binding constraint against acquiring them. **Inference is different**: it is latency-sensitive, it must sit near users and near regulated data, it runs at lower densities, and it can be hosted inside existing connections. Ireland's comparative advantage is regulatory adjacency and jurisdictional trust — not megawatts.

Ireland holds the Presidency of the Council of the European Union from 1 July to 31 December 2026 and will host the **International AI Summit at the RDS in Dublin on 14 October 2026**. This is the platform on which the regulated-inference proposition should be made.[16]

RECOMMENDATIONS

A staged, decision-ready path

Stage 1 — to end-2026

- **Publish a sector-level Grid Headroom Statement** (CRU and EirGrid, annual): the gap between contracted capacity and rolling twelve-month peak demand, in aggregate, never at operator level — and, critically, **disaggregated by load type**. At present no public source breaks the contracted "data centres and other new technology loads" figure into its components, which makes it impossible for policymakers, investors or the public to reason accurately about how much headroom exists and for what. Publishing the split would cost the State nothing and would materially improve the quality of the national debate. *Acceleration trigger:* if undrawn headroom falls below 25% of contracted capacity (utilisation above 75%), the case for accelerating new greenfield applications strengthens automatically. This is a higher threshold than the exhaustion trigger in the Benchmarks section below, and deliberately so: the two mark different points — 60% utilisation is where densification stops being sufficient on its own, 75% is where new buildout becomes unavoidable.
- **Issue formal guidance** (CRU, EirGrid, ESB Networks) on the compliance basis for utilising contracted headroom. It should confirm that adding *fault-ride-through-compliant* inference load inside existing contracted capacity is not a "new connection application" where Maximum Import Capacity is unchanged, and state plainly what compliance requires and how it is demonstrated. This is the single operational lever that converts stranded contracted capacity into usable capacity, and no operator will commit capital against rules that are still in draft and flagged by the System Operator itself as subject to change.
- **Develop the distribution-level fault-ride-through regime now, not later.** The proposed obligation binds transmission-connected facilities; the Distribution Code equivalent is undefined. Distributed, latency-sensitive inference — the workload class Ireland is best placed to host — sits precisely in that gap. Ireland should define the regime before the deployments arrive rather than retrofit it afterwards.
- **Designate "Regulated AI" as a strategic workload class** in the AI Office of Ireland's first work programme, jointly with the Central Bank and OGCIO: inference servicing EU regulated financial services under DORA, Irish

public-sector workloads, or high-risk AI Act applications under Irish competent-authority supervision.

- **Position Ireland's CADA response around sustainable brownfield densification** during the Presidency and at the October AI Summit. Designate Ireland's Data Centre Acceleration Zone on brownfield sites with existing grid connections, and make the argument that this is what CADA's sustainability and grid-availability criteria are for.

Stage 2 — 2027–2028

- **Tie the LEAP Green Energy Parks pipeline to time-matched renewable supply**, not annual additionality alone. Benchmark: 24/7 hourly matching by 2030 for any new Green Energy Park-anchored facility.
- **Commission a CRU/Climate Change Advisory Council quantification** of the emissions effect of the CRU connection regime, published before the next carbon budget cycle. If it finds more than 5 Mt CO_2eq of additional emissions over the second budget, the renewables obligation should be tightened.
- **Resolve the AI Office's placement and its Article 70(2) status.** Two questions need answers: whether the Office's coordinating and sandbox functions sit appropriately within an enterprise-promotion department, and how Ireland reconciles the Office's single-point-of-contact role with the AI Act's requirement that the contact point be a Market Surveillance Authority. If Ireland intends to trade on regulatory credibility, both should be settled before the Presidency ends.

Benchmarks that would change these recommendations

- If sector utilisation (peak divided by contracted capacity) rises above 60%, densification inside existing connections begins to exhaust as a standalone strategy and accelerated Green Energy Parks become urgent; above 75% (see the Stage 1 acceleration trigger), new greenfield connections become unavoidable.
- If EPA projections worsen further, political room for any expansion closes regardless of the grid analysis.
- If CADA's final text drops the brownfield preference or grid-availability screening, Ireland's CADA-aligned argument weakens materially and must be re-made on sovereignty grounds alone.
- If the CRU refuses or materially amends the proposed fault-ride-through modification, the specific compliance mechanism described in Finding 2 changes — but the underlying stability constraint does not, and EirGrid must still manage it by other means. The argument in this paper is built on the constraint, not the instrument.
- If EirGrid, the CRU or ESB Networks publishes a load-type breakdown showing that a large share (above roughly 15–20%) of the contracted figure is *not* data centres, the scale of the headroom available for AI specifically is smaller than assumed here and the opportunity should be re-sized accordingly.

CAVEATS

Limits on the evidence

1. The contracted figure of ~2,300 MW is for "data centres *and other new technology loads*". **No public source — EirGrid, CRU, ESB Networks, CSO or SEAI — publishes a breakdown of it by load type.** That data centres dominate the figure is an inference drawn from EirGrid's own modelling language, not a published fact. We flag this as a material gap in the public record and have written the paper so that its argument does not depend on a precise split.

2. The ~800 MW is a coincident peak, not a sum of site nameplates. Setting a mixed-category contracted figure against a single-category coincident peak overstates the headroom available to data centres specifically; the paper therefore claims a substantial undrawn block rather than a precise megawatt figure.

3. The contracted-capacity and peak-demand figures are attributed to EirGrid's November 2025 fault ride-through information paper; readers should confirm them against the EirGrid source directly. They are sector aggregates, must not be used at operator level, and are not so used here.

4. The proposed fault-ride-through Grid Code modification (MPID345) was recommended to the CRU on 1 April 2026 and **had not been decided as at the date of publication**. Its terms, thresholds, derogation period and the demand-utilisation cap are proposals and may change. The paper's argument is built on the documented stability constraint, which is not in dispute, rather than on the fate of the instrument.

5. The distribution-level fault-ride-through regime is undefined. A sub-transmission inference deployment may fall under rules that do not yet exist.

6. CADA is a proposed Regulation entering the ordinary legislative procedure. Its final text may differ materially, particularly on the brownfield and grid-availability provisions on which this paper's reframe depends.

7. The CSO's 2024 data-centre figure appears revised from 6,969 to 6,973 GWh between releases; the change is inferred by comparison and no explicit revision note was located.

8. Figures of 30–32% for data-centre electricity share circulate widely but are *forecasts*, not measured statistics. The measured 2025 figure is 23%.

9. The CRU connection policy is under judicial review (Record No. 2026/335 JR; leave granted 28 April 2026; three applicants; policy in force, no stay reported; hearing reportedly 2027). The court record number and hearing date are sourced from the litigants and EirGrid's connection documentation rather than a courts.ie printout, and the outcome may alter or set aside the regime this paper describes.

NOTES & SOURCES

Primary sources

1. EirGrid & SONI, *Large Demand Facility Fault Ride-Through Issue and Proposed Solutions* (MPID345 Information Paper, v2.0), 17 November 2025.
2. Central Statistics Office, *Data Centres Metered Electricity Consumption 2025*, 7 July 2026; and *Metered Electricity Consumption 2025*, 7 July 2026.
3. EirGrid & SONI, *All-Island Resource Adequacy Assessment 2026–2035*.
4. Commission for Regulation of Utilities, Decision Paper *CRU/2025/236 — Large Energy Users Connection Policy*, 12 December 2025; superseding Direction CRU/21/124, November 2021.
5. EirGrid, Data Centre Connection Offer Process and Policy (DCCOPP) Version 3, 20 May 2026; *Data Centre Constrained Area Overview*, May 2026.
6. Government of Ireland, *Large Energy User Action Plan (LEAP)*, Cabinet approval 13 January 2026; General Scheme of the Private Wires Bill; CRU Price Review 6.
7. Environmental Protection Agency, *Greenhouse Gas Emissions Projections*, 27 May 2026.
8. Environmental Protection Agency, *Provisional Greenhouse Gas Emissions Inventory 2025*, 8 July 2026.
9. Digital Omnibus on AI: Commission proposal of 19 November 2025; provisional agreement 7 May 2026; formal adoption by the European Parliament and Council reported June 2026 (confirm exact adoption dates against EUR-Lex / EP / Council records).
10. Regulation of Artificial Intelligence Bill 2026, published 17 June 2026 (139 sections, 10 parts, 4 schedules), progressing through the Oireachtas and not yet enacted as at mid-July 2026; S.I. No. 366 of 2025 — European Union (Artificial Intelligence) (Designation) Regulations 2025 (competent authorities); AI Office of Ireland due operational 1 August 2026 on enactment.
11. Oireachtas Joint Committee on Artificial Intelligence, *Second Interim Report*, 9 June 2026 (39 recommendations); *First Interim Report*, 16 December 2025 (85 recommendations). On the AI Office's coordinating (non-MSA) role and the Article 70(2) question, see William Fry, "Irish AI Office Loses Market Surveillance Role", June 2026, analysing s.9 and s.42 of the Bill.
12. European Commission, *Cloud and AI Development Act*, proposed 3 June 2026 (Tech Sovereignty Package); Commission commitment to at least triple EU data-centre capacity within five to seven years.
13. Regulation (EU) 2022/2554 (DORA), application from 17 January 2025; Irish transposition S.I. No. 20 of 2025, 11 February 2025, Central Bank of Ireland as competent authority.
14. United States Department of State, Pax Silica initiative (launched December 2025); Second Pax Silica Summit, 25–26 June 2026; European Commission signature on behalf of the EU (member-state approval 8 June 2026).
15. Council Regulation (EU) 2026/150 of 16 January 2026, amending Regulation (EU) 2021/1173 (EuroHPC Joint Undertaking); InvestAI.
16. Presidency of the Council of the European Union, Ireland, 1 July – 31 December 2026; International AI Summit, RDS Dublin, 14 October 2026.
17. Irish Fiscal Advisory Council, corporation-tax concentration analysis, 19 February 2026.
18. Judicial review of CRU/2025/236: Friends of the Irish Environment, Friends of the Earth Ireland and ClientEarth v CRU, High Court Record No. 2026/335 JR, leave granted 28 April 2026 (policy in force, no stay reported; hearing reportedly 2027). Record number and hearing date sourced from the applicants and EirGrid connection documentation.
19. On load composition: EirGrid Generation Capacity Statement 2023–2032 (origin of the ~2,000 MVA / ~300 MVA contracted figures); MPID345 Information Paper §2.1 and §4.2. No load-type disaggregation is published by EirGrid, the CRU, ESB Networks, the CSO or the SEAI. On Aughinish Alumina's on-site CHP and net-export position, and on the treatment of grid-scale storage as generation rather than demand, see EirGrid Grid Code definitions and the MPID345 Grid Code Review Panel record.
20. EirGrid & SONI, MPID345 Grid Code Modification — Recommendation Paper (1 April 2026) and accompanying Compliance and Derogation Process Framework, including the proposed Grid Code clause CC.7.4.3.2 (recovery to 90% of pre-fault active power demand within 500 ms) and the proposed demand-utilisation threshold. Recommended to the CRU; no decision published as at the date of this paper.

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