United Renewable Ltd's Response to Utility Regulator's Consultation on the Phoenix Energy Gas Conveyance Licence Extension Proposal.

Introduction

United Renewables Ltd (URL) welcomes the opportunity to respond to the Utility Regulator's consultation on the proposed extension of the gas network to accommodate biomethane injection. This submission sets out the critical role of the United Renewables AD (Anaerobic Digestion) site in advancing Northern Ireland's decarbonisation targets while providing substantial socio-economic benefits.

Strategic Importance of Biomethane in Decarbonisation

Biomethane offers a renewable, locally produced alternative to natural gas, directly contributing to Northern Ireland's net-zero ambitions. The Climate Change Act (Northern Ireland) 2022 mandates a legally binding target of achieving net zero greenhouse gas emissions by 2050. Biomethane injection into the gas grid aligns with this framework by decarbonising the existing gas infrastructure without the need for costly retrofitting.

The Belfast Local Area Energy Plan (LAEP), see link below, underscores biomethane's role in the city's decarbonisation strategy. Specifically, the "Biomethane Heating" scenario (Page 55) identifies regions such as West, Botanic, and Court as prime beneficiaries. These areas, often characterised by fuel poverty, can transition to renewable energy with minimal disruption to existing gas customers, as biomethane requires no upgrades to modern domestic or non-domestic boilers.

Belfast Local Area Energy Plan

Capacity of the United Renewables Biomethane Plant

The United Renewables AD plant, located 150 metres southwest of 5 Hannahstown Road, Lisburn, is poised to inject up to 500 standard cubic metres per hour (Scm/h) of

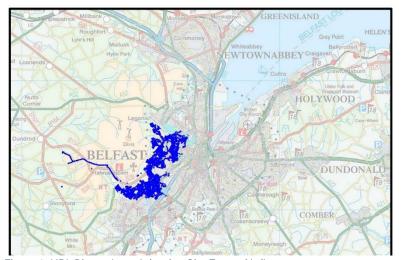


Figure 1; URL Biomethane Injection Site Zone of Influence.

biomethane, equivalent to 48.5 GWh annually.
According to the Detailed Capacity Study by Phoenix, this output can decarbonise approximately 3,750 homes in the Belfast City Region.
This substantial contribution demonstrates the project's alignment with NI's energy and climate objectives.

Policy Alignment and Market Context

- 1. **Northern Ireland's Energy Strategy (2021):** This strategy sets a target of 70% renewable energy by 2030. Biomethane injection into the gas grid complements the electrification of heat and transport by providing a renewable energy source for existing infrastructure.
- 2. **UK Net Zero Strategy (2021):** The UK Government's ambition for net zero by 2050 includes increasing the production of low-carbon hydrogen and biomethane. Northern Ireland's gas network can play a critical role in this transition.
- 3. **Belfast Local Area Energy Plan:** The LAEP identifies biomethane as a low-cost, low-disruption option for decarbonising urban areas, particularly regions grappling with fuel poverty.
- 4. Climate Change Act (Northern Ireland) 2022: The Act's net-zero mandate underscores the urgency of integrating renewable gases like biomethane into the energy mix.

Economic and Social Benefits

The proposed gas network extension provides an opportunity to deliver significant socio-economic benefits:

- **Fuel Poverty Mitigation:** Regions such as West and Botanic, identified in the LAEP, would benefit from low-cost renewable heating solutions, reducing energy bills and improving living conditions.
- **Job Creation:** The United Renewables AD plant supports local employment, both directly through operations and indirectly via the supply chain.
- **Energy Security:** Locally produced biomethane reduces reliance on imported fossil fuels, enhancing Northern Ireland's energy independence.

Technical Feasibility and Minimal Disruption

Biomethane integration into the gas grid is technically straightforward. It requires no upgrades to modern boilers, making it a cost-effective solution for decarbonising heat in existing residential and non-residential buildings. This ensures minimal disruption to gas customers while delivering significant environmental benefits.

Conclusion

Extending the Phoenix Gas Licence to include the United Renewables AD site is a critical step in meeting Northern Ireland's energy and climate objectives. This project will:

- 1. Decarbonise approximately 3,750 homes annually in the Belfast City Region.
- 2. Provide a renewable energy solution with minimal disruption to existing infrastructure and customers.
- 3. Align with the Climate Change Act (Northern Ireland) 2022, the Northern Ireland Energy Strategy, and the Belfast LAEP.
- 4. Support socio-economic development through job creation, fuel poverty alleviation, and enhanced energy security.

We would ask the Utility Regulator to approve the proposed licence extension and support biomethane's role in Northern Ireland's path to net zero.