

## C0. Introduction

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### C0.1

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#### (C0.1) Give a general description and introduction to your organization.

##### About Energia Group

Energia Group is a modern and innovative energy company focused on playing a significant part in the achievement of the energy transition on the island of Ireland. We are committed to acting responsibly in relation to our employees, our customers and communities and we are proud to be one of only 46 companies in Ireland to have been awarded the Business Working Responsibly Mark by Business in the Community. (based on ISO 26000 and audited by National Standards Authority of Ireland).

As a leading energy provider and infrastructure investor Energia Group currently supplies approximately 20% of the island of Ireland's total electricity requirements and is responsible for approximately 25% of wind power capacity installed on the island. The Group supplies 821,000 homes and businesses across the island of Ireland with electricity and gas, through its retail brands Energia and Power NI. Energia Group continues to make progress on its €3 billion Positive Energy investment programme, focused on renewable energy projects. Ongoing projects include onshore and offshore wind, solar, battery storage and green hydrogen. It is anticipated that Energia's programme will add approximately 1.5 GW of additional renewable capacity to the system by 2030 to facilitate the achievement of Government targets and maintain momentum towards the overall objective of Net Zero. We also operate two efficient gas-fired power stations in north County Dublin with a combined capacity of 747 MW critical to ensuring security of supply in the Dublin area and will, for the foreseeable future, play an important role in providing necessary back-up to a growing amount of renewable generation.

##### Business Model and Principal Activities

Energia Group is a leading integrated Irish energy business with substantial businesses in both Ireland (Republic of Ireland or RoI) and Northern Ireland (NI). The Group primarily operates through three business units; Renewables; Flexible Generation; and Customer Solutions.

The Renewables business owns and operates 309MW of wind assets and purchases electricity from 1,282MW of renewable generation capacity throughout Ireland.

The Flexible Generation business owns and operates 747MW of conventional generation assets in the RoI and procures power under contract with 600MW of conventional generation assets in NI.

The Customer Solutions business supplies electricity and gas to 316,600 customer sites in the RoI and 504,400 customer sites in NI through its two retail brands, Energia and Power NI.

##### Our purpose

Energia Group is committed to playing a leading role in the decarbonisation of the energy system across the island of Ireland. We are committed to providing affordable, reliable and clean energy to homes and businesses. We have an ambitious €3 billion positive energy investment plan and we are building innovative wind and solar renewable energy projects whilst also providing critical generation to ensure energy security and to support the energy transition. We are developing battery storage solutions and hydrogen fuel solutions. We are committed to making a positive impact in the communities in which we operate and serve. Our people are core to our success.

##### *DECARBONISING THE ENERGY SYSTEM*

We are committed to reducing the carbon intensity of our electricity generation by 50% by 2030 compared to FY2020 (**FY2020 = 1 April 2019 to 31 March 2020**) levels, to 165gCO<sub>2</sub> / kWh

\*This year we are pursuing SBTi verification.

##### *BUILDING RENEWABLE ENERGY INFRASTRUCTURE*

Increase renewable energy generation from onshore and solar farms threefold by 2030 and significantly more through our offshore renewable energy projects.

We are continuing to deliver our €3 billion positive energy programme as we are building onshore wind farms and developing 2 offshore wind farms.

##### *EMPOWERING OUR CUSTOMERS*

We are passionate about supporting both our residential and business customers' energy transition journey through the provision of a range of innovative energy efficiency products and services and by delivering education and awareness campaigns [for a just energy transition](#).

##### *SUPPORTING THE COMMUNITIES IN WHICH WE OPERATE AND SERVE*

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We are committed to the local communities in which we operate and whom we serve and have a long standing record of working in collaboration with community groups to enhance local areas and to benefit local people. We have invested more than €3 million in communities through our community benefit funds.

**EMPOWERING OUR PEOPLE**

Our people are our most valued asset and are the power behind our business and the driving force to deliver on our strategic objectives. We are proud of our inclusive, diverse and collaborative culture that is underpinned by our core business values. We remain committed to providing a safe, healthy and inclusive working environment for our employees encouraging their professional and personal growth.

**C0.2**

**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	April 1 2021	March 31 2022	No	<Not Applicable>

**C0.3**

**(C0.3) Select the countries/areas in which you operate.**

- Ireland
- United Kingdom of Great Britain and Northern Ireland

**C0.4**

**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

- EUR

**C0.5**

**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

- Operational control

**C-EU0.7**

**(C-EU0.7) Which part of the electric utilities value chain does your organization operate in? Select all that apply.**

**Row 1**

**Electric utilities value chain**

- Electricity generation

**Other divisions**

- Please select

**C0.8**

**(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	XS1684813907
Yes, an ISIN code	XS1684812339
Yes, an ISIN code	XS1684812768
Yes, an ISIN code	XS1684813493

**C1. Governance**

## C1.1

### (C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

## C1.1a

### (C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	Climate related issues are materially important to the Energy sector. The CEO is responsible for the Group's performance in relation to climate action and the delivery of our strategy including climate related targets to 2030. A key strategic target in our strategy is a 50% reduction in the carbon intensity of our electricity generation based on FY2020 levels as well as oversight of a significant increase in our renewable energy portfolio. This year the CEO provided the leadership needed to secure buy-in from the senior management team to endorse the work required for Energia Group to progress Science Based verification for our target.
Chief Financial Officer (CFO)	The Group's Chief Financial Officer is responsible for the continued development and implementation of our ESG Strategy including our assessment of key Climate risks and opportunities. The ESG Steering Group meets quarterly and ensures that ESG related matters are represented at Management Board and Executive Board levels through the ESG Steering Group Sponsor, the Chief Financial Officer. The ESG Steering Group also provides oversight of and guidance to the ESG Working Groups reviewing ESG policies and initiatives ensuring that they remain effective and consistent with the broader Group strategy. The CFO led the delivery of a climate risk and opportunities workshop.
Other, please specify (Company Secretary (assumes role of Risk Officer))	The Company Secretary is the Chair of the Risk Committee and the CFO is the Vice Chair of the Risk Committee. The Company Secretary has day to day responsibility for leading the continued development of ESG factors across the group and embedding ESG into management processes. During the year the Group established its new ESG governance structure to ensure the continued development and implementation of the Group's ESG Strategy and assessment of climate risks and opportunities. As noted above the CFO is sponsor of the new ESG Steering Group.

## C1.1b

### (C1.1b) Provide further details on the board's oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	<ul style="list-style-type: none"> <li>Reviewing and guiding strategy</li> <li>Reviewing and guiding major plans of action</li> <li>Reviewing and guiding risk management policies</li> <li>Reviewing and guiding annual budgets</li> <li>Reviewing and guiding business plans</li> <li>Setting performance objectives</li> <li>Monitoring implementation and performance of objectives</li> <li>Overseeing major capital expenditures, acquisitions and divestitures</li> <li>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</li> </ul>	<Not Applicable >	<p>At Energia group we consider our ESG commitment a vital component of how we do business now and how we will do business into the future. We are committed to integrating ESG including climate related considerations across our business and into our decision-making processes. In order to achieve this we have established a new ESG Governance structure in the Group.</p> <p>Energia Group's Chief Financial Officer is responsible for the continued development and implementation of our ESG Strategy including our assessment of key Climate risks and opportunities and will report back to the Board on progress.</p> <p>Climate change impacts Energia Group in terms of both risks and opportunities. These risks and opportunities have the potential to affect all aspects of our operations, the products and services we provide and our wider business strategy over both the short and long term.</p> <p>We held a workshop to consider climate risks and opportunities relevant to our business utilising the Task Force on Climate-related Financial Disclosures framework. This was our first step in formalising our approach to Climate risk and opportunity, an approach that we will continue to develop in the months ahead.</p> <p>Climate related issues are currently scheduled at all of our ESG data working group meetings and climate related issues are included on the agenda at the Energia Group Management Board's bimonthly meetings.</p>

## C1.1d

### (C1.1d) Does your organization have at least one board member with competence on climate-related issues?

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Yes	<p>The Board is clear that how Energia Group addresses climate-related issues is a matter of long-term corporate performance as well as reputation and good corporate citizenship.</p> <p>The Group's Chief Financial Officer is responsible for the continued development and implementation of our ESG Strategy including our assessment of key Climate risks and opportunities and will report back to the Board on progress. The CFO led the delivery of a climate risk and opportunities workshop utilising the Task Force on Climate-related Financial Disclosures framework. The Group's Secretary is responsible for the Group's risk governance including in relation to climate related risks.</p>	<Not Applicable>	<Not Applicable>

## C1.2

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	<Not Applicable>	Managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Chief Financial Officer (CFO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Other, please specify (Company Secretary)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	As important matters arise
Other, please specify (ESG Steering Group)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	As important matters arise
Risk manager	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Not reported to the board
Other, please specify (Head of Corporate Affairs)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	As important matters arise
Other, please specify (Corporate Development Team)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	As important matters arise
Risk committee	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly

**C1.2a**

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**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

**The Chief Financial Officer**

At Energia group the CFO has executive level responsibility for ESG including climate related issues reporting directly to the CEO and the Board. The CFO chairs the ESG Steering group, who's membership includes senior level leaders across the Group with responsibility for tracking ESG performance and driving best practice on ESG and climate related matters. The CFO is the vice Chair on the Group's Risk Management Committee.

**Group Risk Management Committee - chaired by the Company Secretary**

Energia Group operates a structured and disciplined approach to the management of risk. Management regularly identifies and considers the risks to which the businesses are exposed. Management's assessment of the key risks and the associated controls and actions required to mitigate these risks are recorded in business risk registers. Each risk is regularly assessed for the severity of its impact on the business and for the effectiveness of the controls in place. The risk environment is reviewed continually in order to identify new or emerging potential risks.

The Group's Risk Management Committee (RMC) comprises a number of senior managers from across the Group and meets bi-monthly to oversee the management of risks and ensure that adequate and timely action is taken to mitigate and manage risk. The RMC reviews individual business and functional risk registers and reports to the Audit Committee on a quarterly basis. The Group's Audit Committee, which meets quarterly, plays a key role in internal control and risk management. The Audit Committee monitors the Group's financial reporting processes and the effectiveness of the internal control and risk management systems; reviews and appraises the activities of the internal and external auditors; and provides an open channel of communication among the internal and external auditors, senior management and the Board.

The Group has in place measures to protect against financial and reputational risk from any failure to manage Environmental, Social and Governance (ESG) factors. During the year the Group established a new ESG governance structure to ensure the continued development and implementation of the Group's ESG Strategy and assessment of climate risks and opportunities. Environmental risk including climate related risks are managed through business risk registers; environmental action plans; certified environmental management systems; and identification of potential environmental exposures.

Through its ESG governance structure Energia Group will continue to monitor developments with policy, regulatory and legislation in the RoI and NI. However, there are a number of risks related to the transition to a low carbon economy which the Group will be required to manage. Policy risks include changes in Government climate policy that could impact the delivery of the Group's strategy of investing in renewable electricity generation projects and technology risks include technology and innovation not developing as expected and therefore impacting the delivery of strategy. Furthermore, there could be reputational risks to the Group from any delays to the delivery of its strategy.

**The ESG Steering Group**

The ESG Steering Group meets quarterly and ensures that ESG including climate related matters are represented at Management Board and Executive Board levels through the ESG Steering Group Sponsor, the CFO. The ESG Steering Group also provides oversight of and guidance to the ESG Working Groups reviewing ESG policies and initiatives ensuring that they remain effective and consistent with the broader Group strategy. Aside from the CFO, the ESG Steering group comprises senior leaders across the Group including; Company Secretary; Head of Corporate Development; MD of Renewables; Head of Construction; Head of Asset Operations; Director of HR; General Counsel; Marketing Director; Director Power NI Customer Solutions; Group Governance and Risk Manager; Head of Corporate Affairs; and the ESG & Corporate Communications Manager. Each member of the ESG Steering Group is responsible for supporting and promoting ESG and climate relating matters in his/her business unit or sphere of influence.

Head of Corporate Affairs and the ESG & Corporate Affairs Manager are responsible for monitoring progress against our ESG and climate KPIs and targets and are responsible for both the internal and external communications on same. The ESG & Corporate Communications Manager coordinates the ESG Steering Group and ESG Working Group meetings.

**C1.3**

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	No, not currently but we plan to introduce them in the next two years	We are considering how best to introduce incentives for the management of climate related issues. However it should be noted that as part of Energia Group's Performance and Development programme, bonuses are linked to the delivery of objectives, including climate related objectives, delivery of energy efficiency targets, advocating for climate action and supporting the achievement of our carbon intensity reduction target.

**C2. Risks and opportunities**

**C2.1**

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	2	<p>Within each Risk Register, Energia Group has developed standard templates for use by each of its businesses when performing risk assessments. These templates are consistent across the group and the time horizons for assessing climate-related risks and opportunities is aligned with other business practices. Each risk register includes a risk assessment matrix for assessing both likelihood and impact scores when scoring inherent and residual risks. The matrix includes a standard 6 * 6 assessment criteria and each risk is assessed by applying a score to both the likelihood (possibility of an event happening) and impact (consequences of event happening), whilst considering qualitative and quantitative impacts as relevant for each respective risk against the risk appetite. The relevant time-horizon is considered as part of the likelihood score associated with each risk. Energia Group's risk assessment matrix defines short-term risk horizon as any time between 0-2 years and is noted between scores 4-6 from the risk assessment matrix as follows:</p> <p>6. Has occurred or probable to occur in the near future.  5. Possible in the next 12 months.  4. Possible in the next 1-2 years.</p>
Medium-term	2	5	<p>As extracted from Energia Group's risk assessment matrix, the medium-term time horizon is defined as follows:</p> <p>3. Possible in the medium term (2-5 years).</p> <p>As set out in EirGrid's Generation Capacity Statement, the installed capacity of wind is set to eclipse median peak demand by 2027. During this time period if the grid cannot accommodate continued high level of renewables then this will place a hard limit on Energia Group's renewable development efforts. Since the build out of renewables is the backbone of Ireland's energy transition strategy, this issue presents real and material climate risk. This aligns with the medium term time horizon that we have captured as part of risk 3 - see section 2.3.</p> <p>Furthermore, Energia Group's budgets and forecast calculations generally cover a period of five years. This time horizon is consistent across the Group's businesses and applies to both the assessment of climate-related risks and opportunities the time horizons of other business practices.</p>
Long-term	5	30	<p>As extracted from Energia Group's risk assessment matrix, the long-term time horizon is defined as any period beyond 5 years. This is noted between scores 1-2 from the risk assessment matrix as follows:</p> <p>2. Possible in the long term (5-10) years.  1. Unlikely in the foreseeable future. (10+ years)</p> <p>Whilst Energia Group's budgets and forecast calculations generally cover a period of five years, for any longer periods, a long-term growth rate is calculated and applied to project future cash flows after the fifth year. This time horizon is consistent across the Group's businesses and applies to both the assessment of climate-related risks and opportunities the time horizons of other business practices.</p> <p>Risks 1 and 2 outlined as part of section 2.3 includes the potential for acute physical risks brought about by adverse weather conditions such as violent storms as being more relevant for the Group to consider in the long term i.e. &gt;5 years. This is as a consequence of global climate change and its potential impact on northwest Europe where the Group's operational assets are located. Whilst global climate change is a real risk, the level of disruption is much less predictable.</p>

**C2.1b**

**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

Energia Group has in place measures to protect against financial and reputational risk from any failure to manage Environmental, Social and Governance (ESG) factors including climate-related risks as well as to identify climate related opportunities. In general, ESG factors are managed through integrating ESG into the Group's management processes and core business activities. The assessment and response to climate risk is also integrated into the Group's Risk Management framework. Within this framework, Energia Group defines business impact in terms of the following indicators: Financial, Operational Performance, Legal/ Regulatory (which includes reputational, health & safety and environmental risks).

Across Energia Group's indicators for assessing business impact, Energia Group defines substantive financial or strategic impact which also encompasses climate-related risk as follows:

- Financially between €5M-€10M, or
- in relation to Operational Performance as " Short term unplanned/ forced shutdown of all operations or long term unplanned/ forced shutdown of an element of operations (e.g., a location compromised) ", or
- Legal / Regulatory: " Licence restrictions imposed. Rectification notice received. Undermined public trust or a key relationship for a sustained period or critical moment."

A substantive financial or strategic impact to Energia Group's Operational Performance is the equivalent to " Short term unplanned/ forced shutdown of all operations or long term unplanned/ forced shutdown of an element of operations (e.g., a location compromised) ". So, for example, the risk of extreme variability in weather patterns, could result in disruption to Operational Performance of the Group's Renewable Generation Assets whereby the Group's wind assets are forced to shutdown with a key wind farm location "compromised" as a result.

**C2.2**

## (C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

### Value chain stage(s) covered

Direct operations  
Upstream  
Downstream

### Risk management process

Integrated into multi-disciplinary company-wide risk management process

### Frequency of assessment

Annually

### Time horizon(s) covered

Short-term  
Medium-term  
Long-term

### Description of process

Energia Group's process for identifying, assessing and responding to climate-related risks and opportunities is integrated into its multi-disciplinary company-wide risk management processes.

Climate change impacts our business in terms of both risks and opportunities. These risks and opportunities have the potential to affect all aspects of our operations, the products and services we provide and our wider business strategy over both the short and long term. We held a workshop to consider climate risks and opportunities relevant to our business, utilising the Task Force on Climate-Related Financial Disclosures (TCFD) framework. This was our first step in formalising our approach to Climate risk and opportunity, an approach that we will continue to develop in the year ahead.

Climate-related risk and opportunities are detailed within the Group's Corporate Risk Register and underlying business Risk Registers. Whilst there is currently no standalone ESG risk register, there are plans to implement a specific ESG risk register within the next Financial Year which will consider additional climate-related risks.

Processes for identifying climate-related risks include:

Management use a range of techniques in order to identify the relevant climate risk profiles which includes consideration of emerging risks as a standard agenda item at the Group's RMC along with consideration of various uncertainties and assumptions that can be associated with climate-related risk. Management have also consulted externally with external expert consultants as part of its climate related risk identification processes and to undertake an Advisory audit of ESG during this reporting period. Management also consider Industry sector surveys/ reports (for example EirGrid's (Irish transmission System Operator) recent Shaping Our Electricity Future report) and Regulatory updates to assist with its Climate related risk identification processes.

Energia Group updates its Assurance Framework on an annual basis. The Assurance Framework provides a structured way of identifying and mapping the main sources of assurance across the Group against risks identified in the business risk registers. It provides a framework for reporting key risk assurance information to the Audit Committee by identifying inadequacies in the operation of controls or where there may be insufficient assurance. At the same time, it provides assurance that risks are being managed effectively. The Assurance Framework highlights positive assurances on risks, where controls are considered effective, and areas where the achievement of business objectives are potentially at higher risk due to insufficient controls being in place. Energia Group uses a three lines of defence model, based on the Institute of Internal Auditor's Three Lines Model, to identify and understand the contributions the various sources of assurance provide. Each risk includes reference to the Group's short, medium and long-term time horizons when assessing risk.

The Group's Whistleblowing policy is designed to enable workers throughout the Group to raise concerns internally at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest i.e. climate-related risks and may at least initially be investigated separately but might then lead to other procedures (e.g. disciplinary procedures) being invoked.

Assessing/ Scoring climate-related risks:

As part of Energia Group's Risk management framework, each risk owner is responsible for identifying the relevant risks (including Climate-related risks) as well as opportunities affecting his/her area of responsibility. The risk owner assesses the probability and likely impact of each of the climate risks and responsibilities in his/her area and decides on a recommended mitigating action. Energia Group's risk management framework uses a 6 \* 6 risk matrix to determine the severity of risks, including climate risks. One dimension of the matrix is likelihood and the other is impact. Substantive financial or strategic impact is defined within this as a Level 5 impact within a scale of 1 to 6. All Risk Registers are reviewed and updated annually by the Group's RMC.

For example, the Renewables Risk Register includes climate-related risk considerations as part of its Environmental Risk, (which also extends to health and safety). The risk description includes risks associated with an environmental pollution incident, failure to meet planning environmental requirements or licence standards and the risk of oil spills relating to Offshore development projects.

The potential business impacts associated with this risk include:

- Environmental damage could incur significant clean-up costs and penalties;
- Energia brand loss of prestige and negative market association;
- Impact on Energia Renewables ability to secure future licences to develop / operate projects from the CRU or Utility Regulator;
- Loss of contracts and business relationships with stakeholders as a result of brand loss and negative associations

An inherent risk assessment score of 30 is applied with 6 for Impact and 5 for likelihood thereby exceeding the definition in that the materialisation of this risk is likely to constitute having a substantive Financial impact with an estimated impact of between >€10M with a possibility of materialising within the short-term horizon i.e. within the next 12 months in the absence of any further mitigating controls.

The Renewables team have implemented a number of controls to help manage this risk which includes, a formal framework ensuring a full EHS review is carried out by responsible party, a suite of operational safety procedures that are subject to continuous review,

Energia group management continue to monitor risks in relation to climate and risk monitoring is an integral part of the business as usual activities. Each Risk Register includes a section for action plans to be included relevant for each risk, the purposes of which are to help manage the risk better and improve internal control. The Risk Register actions are tracked by the Energia Group's Risk Governance Manager and are updated continually throughout the year and formally reported at each Risk Management Committee meeting.

As part of Energia Group's annual compliance program, Sustainability Training has been rolled out to all staff across the Group to help assist in responding to climate related risk.

## (C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	<p>The markets in which Energia Group operates are subject to regulatory and legislative intervention at both domestic and EU level. Energia Group is exposed to the impact of regulatory decisions and compliance with licence obligations which impact its generation and supply activities as well as its development projects. Through its senior management, Energia Group maintains regular interaction with the UR, CRU, SEMC, DfE and DECC. A pro-active approach is taken to the Regulatory Authorities' (RAs) consultations on all I-SEM related matters.</p> <p>Please see below by way of example: The Energia Group's Renewables Risk Register includes a risk entitled "Environmental and Compliance with licences, grid requirements and consents". The risk considers risk types such as the Failure to comply with Generator Connection Agreement and Operating Licence, Failure to comply with Grid Code (or obtain necessary derogations), Failure to comply with Generator Licence conditions and a Failure to comply with planning compliance conditions, including noise and habitat management during the construction and operational phases.</p> <p>The Potential Business Implications include an, Inability to achieve projected revenues if physical connection not in place and serviceable or if contractual capacity is restricted by ESB / EirGrid / CRU / NIE / SONI, Invoking of regulatory action/penalty along with reputational damage, Loss of licences or penalties imposed by regulators, Risk of potential litigation and increased costs for project construction and operation arising from non-compliance with planning conditions and Damage to reputation and Energia brand as a result of environmental breaches.</p> <p>Energia's Huntstown plant Risk Register includes a risk labelled "Environmental Compliance" which consider the risk associated with: Failure of the power plants to comply with Integrated Pollution Prevention and Control (IPPC) environmental licence conditions.</p> <p>Failure to comply with IPPC environmental licence conditions could result in the Environmental Protection Agency temporarily shutting down the plants or in an extreme case withdrawing the IPPC licence(s). This would result in loss of revenue to the Energia business and/or negative impact to the Energia Group brand.</p>
Emerging regulation	Relevant, always included	<p>The markets in which Energia Group operates are subject to regulatory and legislative intervention at both domestic and EU level. Energia Group is exposed to the impact of changes in legislation which impact its generation and supply activities as well as its development projects. Through its senior management, Energia Group maintains regular interaction with the UR, CRU, SEMC, DfE and DECC. A pro-active approach is taken to the Regulatory Authorities' (RAs) consultations on all I-SEM related matters.</p> <p>For example, Energia's Huntstown plant Risk Register also considers changes to the plants IPPC environmental licence conditions due to changes in national or EU legislation as part of its risk on "Environmental Compliance".</p> <p>Changes to the IPPC environmental licence conditions could result in the requirement for investment in plant equipment, increasing costs to the business. To help keep abreast of emerging regulation the business avails of third-party support on all aspects of environmental compliance.</p>
Technology	Relevant, always included	<p>Energia Group continues to progress its development of innovative, enhanced and differentiated product offerings to customers in line with its strategy. As part of the Positive Energy Programme, Customer Solutions continues to build new capabilities and products that will allow customers to transform how they use and generate energy in a way that has a positive and sustainable impact on the environment. Its emerging eco-system of intelligent, connected and customer focused technologies gives customers control over how they buy, use and generate their energy.</p> <p>For example, the Energia Customer Solutions Risk Register includes a risk around inadequate resources and systems to manage business changes and growth which is very much focused around new technology and the need for forward planning in response to changes in the market.</p> <p>Energia Group's Corporate Risk Register also includes a risk around the Delivery of significant IT projects. The Group faces market led initiatives that will require significant investment in IT and specialist staff resources e.g. SMART metering in ROI. As part of the National Smart Metering Programme, a programme of replacing legacy meters in the Republic of Ireland (ROI) with Smart Meters was completed, on behalf of the Commission for the Regulation of Utilities (CRU).</p> <p>In 2020/2021 Energia Group, as a retail supplier, completed a Smart Metering Programme ("SMART programme") to progress the required changes to implement the National Smart Metering Programme and continues to facilitate the use of smart metering within its ROI customer base. Smart Meters are electronic devices which record energy consumption by customers and enable frequent (half hourly) recording and reporting of energy used to the supplier. They also enable two-way communication between the supplier and the meter, for example on tariff costs. These devices also include in-home displays which can assist customers in monitoring and understanding their own energy use. Smart Meters additionally enable more innovative tariff structures, including time-of use tariffs, and micro-generation schemes, to be offered to domestic customers. In support of the Smart Metering programme in Ireland, where smart meters are being installed in all homes and small businesses, Energia has successfully deployed new "time of use" products to customers and work is ongoing to further develop opportunities offered by smart meters.</p>
Legal	Relevant, always included	<p>Energia Group faces emerging legal exposure that is driven by the pace of evolution of the modern utilities landscape.</p> <p>As a way of example, the Energia Group's Group Services Risk Register includes a substantive Financial and Strategic risk around emerging legal risk exposure which cites examples such as the digital transformation and the acquisition and development of new technologies in the context of M&amp;A. Such projects are aimed at enabling decarbonisation through smart, low carbon energy technologies.</p>
Market	Relevant, always included	<p>Throughout 2021, the commodity markets for gas and carbon experienced sustained periods of volatility and increasing prices which resulted in higher I-SEM market prices for electricity. Geopolitical circumstances caused further volatility in the wholesale commodity markets in early 2022, and continue to do so, resulting in I-SEM market prices for electricity remaining at consistently high levels.</p> <p>The I-SEM market arrangements create risks to revenues from Energia group's generation activities. The Capacity Remuneration Mechanism (CRM) operates through capacity auctions which award reliability options to successful bidders at the market clearing price. In addition, the Huntstown plants could be required to generate to relieve constraints and therefore participate in the balancing market. The market places restrictions on the costs generation plants can take into account when setting their bids in the balancing market.</p> <p>In setting Energia Group's target to reduce the carbon intensity of our electricity generation by 50% the Group have been ambitious while also taking account of the security of supply and network constraint issues prevalent on the Irish system, particularly in Dublin. These issues have acted as a significant restriction on our stated ambition but reflect our current understanding of the likely system conditions and requirements in 2030.</p>
Reputation	Relevant, always included	<p>Energia Group has in place measures to protect against financial and reputational risk from any failure to manage Environmental, Social and Governance (ESG) factors. In general, ESG factors are managed through embedding ESG into the Group's management processes and core business activities. During the year the Group established a new ESG governance structure to ensure the continued development and implementation of the Group's ESG Strategy and assessment of climate risks and opportunities. Environmental risk, in particular, is managed through business risk registers; environmental action plans; certified environmental management systems; and identification of potential environmental exposures. Furthermore, the Group has been awarded Business in the Community's Business Working Responsibly Mark, an independently audited standard for Corporate Social Responsibility (CSR) and sustainability certification in Ireland.</p> <p>There could be reputational risks to the Group from delays to the delivery of its strategy, which includes Decarbonisation i.e. Energia Group are committed to reducing the carbon intensity of our electricity generation by 50% by 2030 compared to FY2020 levels.</p>



	Relevance & inclusion	Please explain
Acute physical	Relevant, always included	<p>Acute physical risks which can be driven by extreme weather events exist because Energia Group operate a number of assets that by their nature have the potential to be disrupted due to severe weather events such as a violent storm. The location of these assets are on areas of high ground or mountainous areas where there are exposures to extremities in terms of weather. Whilst Wind assets are designed to operate in periods of strong winds it is realised that the impact of violent storms caused by acute physical changes in climate could be unprecedented with the potential to disrupt business operations.</p> <p>The Group's Renewables business includes a key risk around the availability of its wind farm assets. The assets are currently managed through the maintenance contracts that the business has with the original turbine manufacturers and third parties. The Group's Renewables Business is also certified to ISO 55001:2014 Asset Management in respect of its asset management system for renewable generation assets which includes considerations risks such as extreme weather (amongst others) as part of the asset management considerations. Extreme weather conditions could impair assets and render them non-operational for extended periods</p> <p>During the year the Group's Renewables Business achieved certification to ISO 55001:2014 Asset Management in respect of its asset management system for renewable generation assets. ISO 55001:2014 is the international standard for asset management and associated life cycle engineering.</p> <p>Energia Group acknowledge that climate change impacts our business in terms of both risks and opportunities. These risks and opportunities have the potential to affect all aspects of our operations, the products and services we provide and our wider business strategy over both the short and long term.</p> <p>In addition, Energia Group have held a workshop to consider climate risks and opportunities relevant to our business utilising the Task Force on Climate-Related Financial Disclosures (TCFD) framework. This was our first step in formalising our approach to Climate risk and opportunity, an approach that we will continue to develop in the year ahead.</p>
Chronic physical	Relevant, always included	<p>Chronic physical risks which can be driven by changes in weather patterns over time exist because Energia Group operate a number of assets that require wind generation in order to produce electricity and generate revenues. It is recognised that changes in the weather patterns over time could result in pro-longed periods in which there are little or no wind and therefore little to no electricity generation which impacts upon the Group's Revenues.</p> <p>The Energia Customer Solutions risk register for example includes a risk on the failure to effectively forecast wind generation which can have an adverse impact on profitability and so changing wind patterns is a consideration as part of a wider trading strategy.</p> <p>In addition, Energia Group held a workshop to consider climate risks and opportunities relevant to our business utilising the Task Force on Climate-Related Financial Disclosures (TCFD) framework. This was our first step in formalising our approach to Climate risk and opportunity, an approach that we will continue to develop in the year ahead.</p>

## C2.3

### (C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

## C2.3a

### (C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

#### Identifier

Risk 1

#### Where in the value chain does the risk driver occur?

Direct operations

#### Risk type & Primary climate-related risk driver

Acute physical	Other, please specify (Increased severity and frequency of extreme weather events such as violent storms)
----------------	-----------------------------------------------------------------------------------------------------------

#### Primary potential financial impact

Increased capital expenditures

#### Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

#### Company-specific description

The Energia Renewables business owns and operates 309MW of wind assets throughout the island of Ireland. This includes 173MW of operational capacity in Northern Ireland and 136MW of operational capacity in ROI. Due to all of its business operations being centralised on one island presents a number of potential operational risks, many of which are beyond our control. Given Ireland's geographic location of northwest Europe and the increased frequency and severity of storms associated with climate change, Energia Group's assets are exposed to extreme weather events such as violent storms. For example, extreme weather conditions could impair the assets and render them non-operational for extended periods of time. This could be caused by an increased level of severity in the types of weather being experienced across the island with violent storms bringing a combination of gales and floods at unprecedented levels. The island of Ireland has already experienced an increase in the number and severity of storms in recent years which is trend that is likely to continue into the future. Given that the Renewable Assets are located on high ground and in mainly mountainous areas the Group's assets are at risk of exposure to violent storms and thereby we are more likely to experience business disruption.

#### Time horizon

Long-term

#### Likelihood

Unlikely

#### Magnitude of impact

Medium-high

#### Are you able to provide a potential financial impact figure?

Yes, an estimated range

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure – minimum (currency)

5000000

**Potential financial impact figure – maximum (currency)**

8000000

**Explanation of financial impact figure**

Energia Group's financial impact estimate is based on our experience of the energy sector and the impacts that prolonged outages are likely to have on recovery of our operational assets. Energia Group has not yet experienced business disruption caused by an acute physical climate-related weather event that has required disclosure in its financial statements.

The estimated range of between €5m-€8m figure is based on the assumption that there will be a range of costs associated with the property damage caused to a number of the Group's wind turbines and the reinstatement costs associated with returning them to their operational state. Given that the average cost of a wind turbine is a little over €2m and can range from as low as around €1.5m to as high of around €3.5m we are assuming that the damage has been caused to 3 turbines of a total fleet of 120 and costs have been calculated on an average basis.

Typical cost considerations include Property Damage, professional fees incurred to assist with clean-up or other post-event activities and other recovery efforts. The estimated valuation is based on the assumption that the property damage has occurred to three of the Group's wind turbines as opposed to a number of generation assets following one extreme disastrous weather event i.e. an acute physical extreme climate-related weather event causing destruction to a particular location with costs calculated on an average basis. Furthermore the estimation above is for property damage only and does not include an estimate for lost revenues from the wind farm not being able to generate.

Energia Group acknowledges that whilst it holds appropriate property damage insurance for its operational assets in line with good industry practice, there is a risk that such insurance may not cover all eventualities resulting in damage to an operational asset and the interruption caused.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

Energia Group have considered the fact that its Renewables business may incur damage to a number of its windfarm assets following an occurrence of an Acute physical climate-related disaster or extraordinary event.

Ways that Energia Group are responding to this risk include: Business Continuity Planning including crisis management. The Group has measures in place to manage the risk that one or more of its businesses sustains a greater than necessary financial impact through inability to carry on its operations either for a short or prolonged period. The Group's Incident Emergency Response Plan is continually reviewed and updated.

The Group has property damage insurance in place for its wind farm assets. However, even though property damage insurance is in place, the Group could potentially be exposed to a greater than necessary financial impact in the event that the cause of the damage is not covered under the policy.

Emergency drills are carried out with staff focusing on return to critical operations in as timely manner as possible. Energia Group includes scheduled regular testing of primary Wind Farm protection systems as appropriate in line with manufacturers practice and good industry practice.

Energia Group ensures that any of its contractors provide properly trained staff with the appropriate levels of insurance cover annually. Construction contractors need to demonstrate adequate procedures and appropriate levels of insurance cover.

**Comment****Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical	Other, please specify (Increased severity and frequency of extreme weather events such as violent storms)
----------------	-----------------------------------------------------------------------------------------------------------

**Primary potential financial impact**

Decreased revenues due to reduced production capacity

**Climate risk type mapped to traditional financial services industry risk classification**

&lt;Not Applicable&gt;

**Company-specific description**

As Energia Group's business operations are centralised on the island of Ireland, this presents a number of potential operational risks, many of which are beyond our control. There is the potential for increased frequency and severity of storms associated with climate change which will be relevant to Energia Group's geographic location as part of northwest Europe. As a result, Energia Group's assets may be exposed to extreme weather events. For example, extreme weather conditions could render the assets unavailable for extended periods of time resulting in large periods in which the assets are non-operational. This could be caused by an increased level of severity in the types of storms being experienced across the island with violent storms bringing a combination of gales and floods at unprecedented levels. The island of Ireland has already experienced an increase in the number and severity of storms in recent years which is trend that is likely to continue into the future. Given that the Renewable Assets are located on high ground and in mainly mountainous areas the Group's assets are at risk of exposure to violent storms and thereby it is more likely to experience business disruption. The overall implication on this occasion is one of loss of Revenues given the unavailability of the Group's assets for an extended period of time resulting in reduced generation capacity.

**Time horizon**

Long-term

**Likelihood**

Unlikely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

10000000

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

Energia Group's financial impact estimate is based on its experience of the ISEM market and the impacts that prolonged outages are likely to have on the Group's Revenue. Energia Group has not yet experienced business disruption that has been caused by an acute physical climate-related event, that has required disclosure in its financial statements. Typical considerations also include current levels of volatility being experienced in the wholesale commodity markets which are likely to continue into the future and so assumes a continuation of higher energy prices.

In this instance, we have made an assumption that extreme weather events could potentially take each of our windfarms offline for an average of 1 week per year - that's circa €2m lost turnover per annum, which over 5 years is €10m.

Energia Group acknowledges that whilst it does hold appropriate business interruption insurance for its operational assets in line with good industry practice, there is a risk that such insurance may not cover all eventualities resulting in damage to an operational asset and the interruption caused.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

Energia Group have considered the fact that its Renewable business may be unable to operate following an occurrence of an Acute physical climate-related disaster or extraordinary event resulting in a loss of revenues due to reduction in renewable generating capacity.

Ways that Energia Group are responding to this risk include: Business Continuity Planning including crisis management. The Group has measures in place to manage the risk that one or more of its businesses sustains a greater than necessary financial impact through inability to carry on its operations either for a short or prolonged period. The Group's Incident Emergency Response Plan is continually reviewed and updated.

The Group has business interruption insurance in place for its wind farm assets. However, even though business interruption insurance is in place, the Group could potentially be exposed to a greater than necessary financial impact in the event that the cause of the damage is not covered under the policy. Energia Group performs a review with its insurers of existing and emerging risks in the wind farm generation industry.

**Comment**

**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Technology	Transitioning to lower emissions technology
------------	---------------------------------------------

**Primary potential financial impact**

Decreased revenues due to reduced production capacity

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

The power system on the island of Ireland is a world leader in the integration of high levels of instantaneous wind power, accommodating up to 75% of system demand with plans to get this to 95% by 2030. If the grid and by extension the wider power system, cannot accommodate the continued rise of renewable capacity then this will place a hard limit on the magnitude of Energia Group's future renewable development pipeline. Since the build out of renewables is the backbone of Ireland's energy transition strategy, this issue presents real and material climate risk.

The Irish power system has significant installed capacity of wind far from demand centres (also reflected in Energia Group's wind portfolio), which is small and is poorly interconnected to neighbouring systems. The reliance of system security on a number of relatively large (high minimum generation levels compared to peak demand) gas generating stations further reduces the flexibility afforded to transmission system operators (TSOs) to enable integration of higher installed wind capacity on the road to achieving 2030 climate change targets.

As a result, in times of high wind and/ or low demand the TSOs are required to dispatch down wind farms across the country in order to operate the system safely or respect local network limits. At high levels of installed renewable capacity, there will also be periods where more wind is blowing than is required by demand. Dispatch down consists of curtailment (TSO redispatch for system wide security reasons), constraints (TSO redispatch for local network reasons) and oversupply. This results in societally valuable renewable energy being wasted, which in a more flexible system may have been accommodated and contributed to lower emissions. The overall impact of dispatch down is dependent on network reinforcement, investment in storage/network reinforcement avoidance and general power system flexibility.

Dispatch down has a material impact on the cost of capital for the construction of new wind assets and negatively affects the returns associated with current assets. This has a clear dampening effect on wind asset development which restricts Energia Group's ability to deliver the investment required to achieve our ambitious climate change goals.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

16000000

**Potential financial impact figure – maximum (currency)**

28000000

**Explanation of financial impact figure**

The financial impact assessment is based on Energia's onshore wind development pipeline (267MW), capacity factors for new onshore wind (35%) and an assumed future support scheme auction price. The rate of total dispatch down is informed by TSO modelling (lower bound 15%, upper bound 26%). This yields a lower and upper bound of €16 million and €28 million respectively.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

Energia Group are managing this risk by engaging with regulators and TSOs who are directly involved in remedying the challenges of grid development, participating fully in consultations and bilateral engagements. This activity is supported by playing active roles in industry groups such as Wind Energy Ireland, Energy Storage Ireland, Renewable NI.

**Comment****C2.4****(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.4a****(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.****Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Other, please specify (Increasing the availability of renewable energy through the expansion of our renewable energy portfolio through the development of innovative offshore wind.)

**Primary potential financial impact**

Increased revenues resulting from increased production capacity

**Company-specific description**

As the need and demand for renewable electricity generation increases, so too will the opportunities for the Group to invest in such assets (in line with its strategy). For example, the Irish and Northern Irish Governments have a target to achieve 80% of Ireland's electricity supply to be generated from renewables by 2030. The Irish Government's Climate Action Plan published in 2021 includes a 5.0GW offshore wind target for 2030.

Energia Group's volume of renewable electricity will grow with the delivery of its offshore wind towards the end of the decade. In September 2021, Foreshore Licences for Energia Group's two offshore wind projects – North Celtic Sea (600-800 MW) and South Irish Sea (600-800 MW) – were granted by the Department of Housing, Local Government and Heritage. The licences have enabled the Group to schedule geotechnical and geophysical surveys of the proposed project sites and these surveys will take place between April and August 2022. Public consultation and engagement has been central to progress on both projects and in FY22 we completed the first of three planned public consultations on the respective projects.

**Time horizon**

Long-term

**Likelihood**

More likely than not

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

250000000

**Potential financial impact figure – maximum (currency)**

500000000

**Explanation of financial impact figure**

The estimated annual impact on Energia Group's overall Revenues is between €250m-€500m. Based on the successful implementation of two offshore windfarms the calculation assumes two offshore windfarms at 700MW each .

The total financial impact on Energia Group's Revenues is dependent on the level of additional offshore wind projects invested in and future wholesale electricity market prices.

**Cost to realize opportunity**

3000000000

**Strategy to realize opportunity and explanation of cost calculation**

Energia Group is committed to playing a leading role in the decarbonisation of the energy system across the island of Ireland. We are committed to providing affordable, reliable and clean energy to homes and businesses. We have an ambitious positive energy investment plan of up to €3bn investment programme dependent on what projects are agreed and we are building innovative wind and solar renewable energy projects whilst also providing critical generation to ensure energy security and to support the energy transition. We are developing battery storage and hydrogen fuel solutions. We are committed to making a positive impact in the communities in which we operate and serve. Our people are core to our success.

The transition to a low carbon economy presents opportunities and the Group continues to implement its Positive Energy investment programme across a range of major renewable energy projects including onshore and offshore wind farms, solar power, hydrogen fuel generation and the smart grid. The Positive Energy programme is aligned with the Government of Ireland's commitment to increase the amount of electricity generated from renewable sources to 80% by 2030 and will contribute to further sustainability in Ireland's energy supply and to the achievement of Ireland's climate change reduction targets. Furthermore, the Group has committed to target a 50% reduction in the carbon intensity of its electricity generation by 2030 compared to FY20 levels through a number of measures including the delivery of its Positive Energy programme.

**Comment**

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**Identifier**

Opp2

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development of new products or services through R&D and innovation

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Continue to grow the Group's Lighting Solutions Business that will help capitalise on climate-related opportunity.

Energia Lighting Solutions was initiated to provide a new and innovative source of revenue for the business. Energia commercial customers will be provided with an opportunity to avail of lighting surveys, design and energy efficient lighting upgrade installations, which will be fully funded by Energia. The funding structure will be based on providing finance to cover the cost of the lighting and lighting sales. Customer repayment costs will be offset against savings through installing the lighting. One of the advantages of the project is that it that it will ensure on-going multi-year engagement between the customer and Energia.

The scheme will enable customers to upgrade their lighting and repay the capital costs through their energy bills.

We see this as a potential avenue for future revenue growth as customers become more climate-aware and look for alternative solutions to reduce their own climate emissions which we would hope to be able to offer a cost-effective customer solution.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

25000000

**Potential financial impact figure – maximum (currency)**

30000000

**Explanation of financial impact figure**

The initial investment costs associated with the Lighting Solutions Business are around €5m and given the increased demand for the services it is anticipated that the business could return average annual revenues of around €5.5m over the next five years. The potential financial impact figure of between €25m-€30m is in relation to the estimated revenue returns over a five year period. The total financial impact on revenues is dependant on the level of additional LAAS projects delivered and market prices.

**Cost to realize opportunity**

5000000

**Strategy to realize opportunity and explanation of cost calculation**

The initial €5million outlay associated with the Lighting Solutions Business is the cost for Energia Group to fund the customer installations upfront and is before the business begins making a return on the costs associated with the refitting and the repayments of the lighting.

**Comment**

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**Identifier**

Opp3

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Markets

**Primary climate-related opportunity driver**

Access to new markets

**Primary potential financial impact**

Increased revenues through access to new and emerging markets

**Company-specific description**

Electrification of the energy system leading to market growth, for example the electric vehicle markets.

According to the Sustainable Energia Authority of Ireland (SEAI), transport is the single largest source of energy related CO2 emissions in Ireland. This presents a real and immediate risk to the fight against climate change. There is a clear need for the transport sector to transition away from fossil fuels to electric vehicles (EV's) in order to spearhead the transition to a low carbon energy system. As a generator and supplier of electricity, increased electricity demand due to the roll out of EV's represents an opportunity for Energia Group, but also enables transport emissions to be avoided using renewable electricity.

**Time horizon**

Long-term

**Likelihood**

Likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

10000000

**Potential financial impact figure – maximum (currency)**

18000000

**Explanation of financial impact figure**

In their Centralised Energy and Coordinated Action future energy scenarios, EirGrid forecast between 500,000 and 950,000 EV and delivery vans to be on the road in Ireland by 2030 with specific consumption of 17.47 and 15.39 kWh/100km respectively. Using market share data (~10%) and Energia's existing night time EV tariff (7c/kWh) this opportunity is calculated to increase revenue by €10m - 18m per year.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

The primary drivers of EV demand are the policy decisions of government and the continued development of sustainability driven purchasing behaviour from consumers. These are key features of Energia Group's external environment which are independent of the Group's strategy. As an incumbent energy supplier whose business model is consumption based, Energia Group will benefit from an increasing aggregate demand curve for electricity due to EV demand driven by the aforementioned external factors. The opportunity identified does not assume any increase in Energia's market share. The pool based nature of the energy market ensures that the business can serve this additional demand with no material changes to strategy or operations.

**Comment**

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**Identifier**

Opp4

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Use of new technologies

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Energia Group is committed to playing a leading role in the decarbonisation of the energy system across the island of Ireland. To assist with this, Energia Group has identified an opportunity for solar wind and is developing a further pipeline of solar projects across Ireland.

The Group has consented solar projects in the RoI for which it has submitted planning applications to increase the scale of these projects. In addition, the Group is progressing a number of further greenfield solar development opportunities in the RoI. The current pipeline of in-development solar projects is 313MW. These are long-term strategic projects for the group which we hope to have in place in within 5+ years and should return substantive Financial impacts for the Group.

**Time horizon**

Long-term

**Likelihood**

Likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

18000000

**Potential financial impact figure – maximum (currency)**

20000000

**Explanation of financial impact figure**

Average Revenue returns from the Group's solar investments are estimated at around €60k per MW per year. Therefore it is anticipated that 313MW of solar farm would provide an estimated revenue return of between €18m-€20m. per year. The total financial impact on revenues is dependant on the level of additional solar projects invested in and future wholesale electricity market prices.

**Cost to realize opportunity**

203450000

**Strategy to realize opportunity and explanation of cost calculation**

Costs to develop solar projects can range between €550k-€650k per MW and so 313MW of solar development can equate to and overall investment of €203,450,000. In terms of costs, the main categories of spend are the panels themselves, the invertors to convert from DC to AC for the grid, grid connection costs, land costs and the civil costs to develop the site.

**Comment**

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### C3. Business Strategy

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#### C3.1

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**(C3.1) Does your organization's strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a transition plan within two years

**Publicly available transition plan**

<Not Applicable>

**Mechanism by which feedback is collected from shareholders on your transition plan**

<Not Applicable>

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

<Not Applicable>

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

Energia Group has a science-based target (not yet verified) and we are committed to reducing the carbon intensity of our electricity generation by 50% by 2030 compared to 2020 levels, to 165gCO<sub>2</sub> / kWh. This medium-term target is aligned with a 2.0°C pathway, the achievement of which will facilitate the wider decarbonization of electricity generation across the island of Ireland and place the Group on a pathway to achieve a long-term Net Zero position.

Energia Group owns and operates two CCGT plants at the Huntstown campus in north Dublin. These units provide critical security of supply to homes and businesses in the Greater Dublin Area and are regularly required to run to satisfy operational constraints imposed by the Transmission System Operator (TSO) EirGrid for the safe and secure supply of electricity. As the running of these plants is dictated by the TSO, the Group is not able to control their emissions. As such, based on current forecasts of electricity demand and network upgrades from the TSO, it is expected that Huntstown will continue to be required to generate significant volumes of electricity for security of supply and system services. Based on the detailed electricity system modelling undertaken by Energia Group, it is not possible for the Group to commit to a transition plan which aligns to a 1.5°C pathway.

Energia Group is committed to playing a leading role in the decarbonisation of the energy system across the island of Ireland. We are committed to providing affordable, reliable and clean energy to homes and businesses. We have an ambitious €3 billion positive energy investment plan and we are building innovative wind and solar renewable energy projects whilst also providing critical generation to ensure energy security of supply and to support the energy transition e.g. are developing battery storage solutions and hydrogen fuel solutions.

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

#### C3.2

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**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	No, but we anticipate using qualitative and/or quantitative analysis in the next two years	Important but not an immediate priority	During the year, Energia Group held a dedicated workshop to consider climate risks and opportunities relevant to our business utilising the Task Force on Climate-related Financial Disclosures (TCFD) framework. This was the next step in the development of our Climate risk and opportunity approach, an approach that we will continue to develop in the months ahead.

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	<p>Yes- climate-related risks and opportunities have influenced Energia Group's strategy with regards to Products and Services. We have adapted our strategy by supporting both our residential and business customers' energy transition journey through the provision of a range of innovative energy efficiency products and services and by delivering education and awareness campaigns for a just energy transition.</p> <p>Residential customers By way of example, we continue to help customers as they transition to low carbon living through microgeneration as a way of delivering on our long-term strategy. Microgeneration of electricity by customers through renewable technologies such as solar panels allows customers to export the surplus electricity produced to the grid and receive a payment for it. Microgeneration of electricity from renewable technologies contributes to a greener Ireland by exporting surplus green electricity to the grid while also reducing electricity costs for the customer. Power NI currently facilitates 11,000 microgeneration customers in NI with a generation capacity of 66,511KW. Energia offers solar and residential battery storage packages to customers which are complemented by a microgeneration tariff to enable customers to be paid for electricity exported to the grid.</p> <p>Other areas of the Group's residential business that aligns with its long-term strategy includes supporting Ireland's National Retrofitting scheme, progression of E-mobility initiatives, supporting development of a zero-emissions hydrofoil ferry in relation to maritime transport and by collaborating with local Universities and government organisations to ensure no one is left behind and that tenants living in Social Housing within Northern Ireland for example are able to take advantage of cheaper, greener wholesale electricity prices.</p> <p>Business Customers By way of examples, we have partnered with Irish sustainability tech company Cognition World to launch Energia Connect 360, a real-time data analytics portal to help business customers reduce consumption, eliminate waste and improve sustainability in a cost-effective manner as part of the Group's long-term strategy.</p> <p>The Group's Lighting Solutions Scheme also enables customers to upgrade their lighting and repay the capital costs through their energy bills and we continue to deliver on this strategic long-term strategy for the Group.</p>
Supply chain and/or value chain	Yes	<p>Yes - climate-related risks and opportunities have influenced the Group's strategy with regards to its value chain.</p> <p>As a major purchaser, Energia Group recognises that it has an opportunity to encourage suppliers of materials and services to deliver good environmental and safety performance and to maintain responsible practices towards their employees and the communities in which they operate.</p> <p>In relation to the specifics, we have influenced our business strategy by altering our Procurement strategies, policies and targets, particularly in relation to the renewable energy (electricity) consumption across our offices. This is happening as part of our overall long-term strategy around reducing greenhouse gas emissions by 2030 and has resulted in our office energy use transitioning to green energy.</p> <p>In terms of the delivery against this Strategy, as an example, for Power NI's total tCO2e in the year ended 31 March 2022 was 32 tCO2e (2019-20 - 211) representing an 85% decrease on the baseline year, while the tCO2e per FTE also shows an 85% reduction. This is largely the result of switching to renewable energy tariffs for electricity.</p>
Investment in R&D	Yes	<p>Yes - climate-related risks and opportunities have influenced Energia Group's strategy with regards to investment in R&amp;D. The transition to a low carbon economy presents a number of risks and opportunities as the Group continues to implement its €3 billion Positive Energy investment programme across a range of major renewable energy projects including onshore and offshore wind farms, solar power, hydrogen fuel generation and the smart grid as part of a long-term strategy.</p> <p>The Positive Energy programme is aligned with the Government of Ireland's commitment to increase the amount of electricity generated from renewable sources to 80% by 2030 and will contribute to further sustainability in Ireland's energy supply and to the achievement of Ireland's climate change reduction targets.</p> <p>The Irish Government's Climate Action Plan published in 2021 includes a 5.0GW offshore wind target for 2030. Energia Group are in the process of developing 2 significant offshore wind farms in the North Celtic Sea &amp; South Irish Sea (both between 600-800 MW).</p> <p>The Group currently has 267MW of new onshore wind projects in development and a further 313MW in new solar capacity.</p> <p>Construction works have started on a 49 MW onshore windfarm in Drumlins, Co. Monaghan. The windfarm will consist of 8 wind turbines and when fully operational, will generate enough renewable electricity to meet the annual electricity needs of 34,000 households.</p> <p>Digitalisation also continues to be a long-term strategic priority for the Group and during the year we embarked upon the development of a Digital IQ platform. Digital IQ is the Group's as a service platform accelerating the shift to zero carbon. From advanced billing to smart electric vehicle charging, the Digital IQ platform will empower the Group to provide a more efficient and personalised service to its customers. This real-time cloud platform will transform the Customer Solutions business by helping reduce cost to serve, boosting customer engagement and enabling decarbonisation through smart, low carbon energy technologies.</p>



	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Operations	Yes	<p>Yes - climate-related risks and opportunities have influenced Energia Group's strategy with regards to operations.</p> <p>We have set our first climate-related target to reduce the carbon intensity of our electricity generation by 50% by 2030. The achievement of this target will ensure the Group is well-positioned to maintain progress towards a long-term Net Zero position, a core aspect of our long term strategy.</p> <p>In setting this target we have been ambitious while also taking account of the security of supply and network constraint issues prevalent on the Irish system, particularly in Dublin. This target is accompanied by our ambition to increase by a factor of 3 the amount of renewable electricity we generate from onshore wind and solar by 2030; the Group also has two offshore windfarms in development for 2030</p> <p>Example: the operation of the Group's Huntstown units, is a relevant example of the role and importance of gas-fired generation to the wider economy, particularly in highly constrained demand centres such as Dublin. In EirGrid's recent Shaping Our Electricity Future report, the high risk of significant overloading of the network in Dublin was specifically addressed. In FY22 approximately 23% of all generation at Huntstown was required by EirGrid to meet unanticipated shortfalls in generation elsewhere in the system and/or local system constraints.</p> <p>On the basis of the analysis presented by EirGrid, it is likely that Dublin will continue to be highly constrained in the period to 2030. This has important implications both for Huntstown and the Group's carbon intensity targets that have had to assume a significant volume of constrained running for the remainder of the decade in order to facilitate the energy transition.</p> <p>The Group also owns and operates 14 onshore wind farms with a capacity of 309MW. This comprises of 136 MW in Ireland and 173 MW in Northern Ireland.</p> <p>As well as the onshore wind assets owned and operated by the Group, it also has a contracted renewable PPA portfolio of 1,282 MW, primarily consisting of off-take contracts with third party owned wind farms. These contracts are a key enabler for renewable projects to access financial support (e.g. REFIT / RESS / NIRO) and provides a clear route to market for their generation. Overall, the Group supplied 2.88 TWh of renewable electricity to the all-island market in FY22, avoiding 1.17m tCO2.</p>

## C3.4

### (C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence
Row 1	Capital expenditures Acquisitions and divestments Access to capital	<p>Energia Group's strategy (approved by the Board) is underpinned by four strategic objectives, one of which is to "build on and diversify the increasing platform of renewable assets to accelerate low carbon growth and increase earnings." The transition to a low carbon economy presents opportunities and the Group continues to implement its Positive Energy investment programme across a range of major renewable energy projects including onshore and offshore wind farms, solar power, hydrogen fuel generation and the smart grid. The Positive Energy programme is aligned with the Governments of Ireland and Northern Ireland's commitment to increase the amount of electricity generated from renewable sources to 80% by 2030 and will contribute to further sustainability in the energy supply and to the achievement of Ireland's climate change reduction targets on the island of Ireland. Furthermore, the Group has committed to target a 50% reduction in the carbon intensity of its electricity generation by 2030 compared to FY20 levels through a number of measures including the delivery of its Positive Energy programme.</p> <p>In relation to the Group's Financial Planning we are continually looking to build renewable energy infrastructure to help achieve the carbon reduction targets. As part of this we aim to:</p> <p>Capital Expenditure :</p> <p>Increase the volume to renewable electricity that the Group generates from onshore and solar by a factor of three by 2030 which ties to our longer term strategic time horizon of beyond 5 years. Continue to deliver our €3 billion positive energy programme through the development of new onshore wind and solar farms and developing 2 significant offshore wind farms.</p> <p>Acquisitions &amp; Divestments:</p> <p>On 27 May 2021, the Group completed the acquisition of the entire issued share capital of Drumlins Park Limited (Drumlin), a 49MW wind farm development project in County Monaghan. On 11 March 2022, the Group completed the acquisition of the entire issued share capital of Gaofar Limited (Ballylongford), a 25MW wind farm development project in County Kerry.</p> <p>Access to Capital :</p> <p>In March 2022, with the consent of its lenders, the Group increased the Senior revolving credit facility to £305m (previously £225m) and extended the maturity to June 2024 (previously September 2023). The Group continues to keep its capital structure under review and may from time to time undertake certain transactions such as financing transactions, acquisitions and disposals which affect its capital structure.</p>

## C4. Targets and performance

### C4.1

#### (C4.1) Did you have an emissions target that was active in the reporting year?

Intensity target

#### C4.1b

#### (C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).

Target reference number

Int 50

Year target was set

2022

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

**Scope 2 accounting method**

&lt;Not Applicable&gt;

**Scope 3 category(ies)**

&lt;Not Applicable&gt;

**Intensity metric**

Metric tons CO2e per megawatt hour (MWh)

**Base year**

2020

**Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)**

0.332

**Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)**

&lt;Not Applicable&gt;

**Intensity figure in base year for Scope 3 (metric tons CO2e per unit of activity)**

&lt;Not Applicable&gt;

**Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)**

0.332

**% of total base year emissions in Scope 1 covered by this Scope 1 intensity figure**

100

**% of total base year emissions in Scope 2 covered by this Scope 2 intensity figure**

&lt;Not Applicable&gt;

**% of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this Scope 3 intensity figure**

&lt;Not Applicable&gt;

**% of total base year emissions in all selected Scopes covered by this intensity figure**

100

**Target year**

2030

**Targeted reduction from base year (%)**

50

**Intensity figure in target year for all selected Scopes (metric tons CO2e per unit of activity) [auto-calculated]**

0.166

**% change anticipated in absolute Scope 1+2 emissions**

-30

**% change anticipated in absolute Scope 3 emissions**

-30

**Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)**

0.33

**Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)**

&lt;Not Applicable&gt;

**Intensity figure in reporting year for Scope 3 (metric tons CO2e per unit of activity)**

&lt;Not Applicable&gt;

**Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)**

0.33

**% of target achieved relative to base year [auto-calculated]**

1.20481927710843

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

Energia Group is committing to reducing the carbon intensity of its electricity generation by 50% by 2030. Energia Group is committed to playing a leading role in the decarbonisation of the energy system across the island of Ireland and the objective will see it reduce the carbon intensity of its electricity generation by 50% to 165 gCO2/kWh by 2030 compared to FY2020 levels. This target will ensure that the Group is well placed to achieve Net Zero by 2040.

**Plan for achieving target, and progress made to the end of the reporting year**

The Group is progressing with plans to increase its renewable energy generation from both onshore wind projects and solar farms threefold by 2030; the Group is also progressing two offshore windfarms in line with 2030. It will also continue to support residential and business customers through energy awareness campaigns and delivering deep retrofits through the Energia Cozy Homes scheme, and ongoing roll out EV charging and lighting efficiency schemes. We are playing a leading role in the decarbonisation of the energy system across the island of Ireland through the delivery of an ambitious €3 billion positive energy investment plan. This investment programme includes innovative wind and solar renewable energy projects, developing hydrogen fuel and battery solutions whilst also providing critical generation to ensure

energy security and to support the energy transition.

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

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#### C4.2

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**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

No other climate-related targets

#### C4.3

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**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

No

#### C4.3d

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**(C4.3d) Why did you not have any emissions reduction initiatives active during the reporting year?**

We are progressing with a number of energy efficiency initiatives and we will formalise our reporting of these for next year's submission.

#### C4.5

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**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?**

Yes

#### C4.5a

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**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.**

**Level of aggregation**

Product or service

**Taxonomy used to classify product(s) or service(s) as low-carbon**

The EU Taxonomy for environmentally sustainable economic activities

**Type of product(s) or service(s)**

Power	Onshore wind
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**Description of product(s) or service(s)**

Energia Group operate 15 wind farm sites across the island of Ireland representing a 309MW capacity.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Yes

**Methodology used to calculate avoided emissions**

Other, please specify (GHG Protocol )

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**

Gate-to-gate

**Functional unit used**

tonnes CO2e

**Reference product/service or baseline scenario used**

Residual Fuel Mix for the Single Electricity Market published annually by the Commission for Regulation of Utilities (Ire) and Utility Regulator (NI)

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

Gate-to-gate

**Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario**

262009

**Explain your calculation of avoided emissions, including any assumptions**

Electricity generated by Energia Group's 309 MW of renewable electricity assets (onshore wind) that otherwise would have been supplied by the grid (Single Electricity Market) with emissions equal to the Single Electricity Market Residual Fuel Mix. For the relevant year, this calculation is: 643,757 GWh x 0.407 tCO2/MWh.

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**

12.5

**C-EU4.6**

**(C-EU4.6) Describe your organization's efforts to reduce methane emissions from your activities.**

This Q is not applicable.

**C5. Emissions methodology**

**C5.1**

**(C5.1) Is this your first year of reporting emissions data to CDP?**

Yes

**C5.2**

**(C5.2) Provide your base year and base year emissions.**

**Scope 1**

**Base year start**

April 1 2019

**Base year end**

March 31 2020

**Base year emissions (metric tons CO2e)**

1181142.2

**Comment**

For this total CO2e conversion factor for Huntstown 1 & 2 is from the verified greenhouse gas C)2e which is calculated from the carbon content of the various gas components from the gas chromatograph analysis at the site. The GHG Conversion Factors for Company Reporting is used for other data eg company vehicles (<https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2019>).

**Scope 2 (location-based)**

**Base year start**

April 1 2019

**Base year end**

March 31 2020

**Base year emissions (metric tons CO2e)**

2326

**Comment**

**Scope 2 (market-based)**

**Base year start**

April 1 2019

**Base year end**

March 31 2020

**Base year emissions (metric tons CO2e)**

287

**Comment**

**Scope 3 category 1: Purchased goods and services**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Water data not available for baseline year

**Scope 3 category 2: Capital goods**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Relevant not calculated. Procurement of equipment such as turbines for renewables sites or power plant facilities.

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not Relevant- accounted for in scope 1 & 2.

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not Relevant. Not considered to be substantial

**Scope 3 category 5: Waste generated in operations**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not available for chosen baseline year but calculated in subsequent year.

**Scope 3 category 6: Business travel**

**Base year start**

April 1 2019

**Base year end**

March 31 2020

**Base year emissions (metric tons CO2e)**

156

**Comment**

Includes grey fleet and flights

**Scope 3 category 7: Employee commuting**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Relevant not Calculated for baseline year. Currently being calculated based on data collected from recent online Sustainability Training delivered by Vyra (May 2022).

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not Relevant. Data on energy use from leased buildings has been included in scope 2.

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Delivered product is electricity or gas. From the facility boundary (meter point) the power is "notionally" in the wholesale market (pool). Transmission losses would be the responsibility of the TSO / DSO. Could consider waste removal but not considered to be substantial

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

As products are electricity and gas further processing is not carried out

**Scope 3 category 11: Use of sold products**

**Base year start**

April 1 2019

**Base year end**

March 31 2020

**Base year emissions (metric tons CO2e)**

567108

**Comment**

This relates to the sale of fossil fuels (i.e. natural gas) to customers. Retail gas supplied by Energia and the associated emissions are calculated using SEAI conversion factor 2020.

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not relevant to Energia Group's activities as a supplier of electricity and natural gas.

**Scope 3 category 13: Downstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not Relevant. We do not have assets that we own and lease to others.

**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not Relevant. Not part of our business model.

**Scope 3 category 15: Investments**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

0

**Comment**

Not relevant- no materially significant investments. Our investments are all in our own assets/projects

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**C5.3**

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**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

European Union Emission Trading System (EU ETS): The Monitoring and Reporting Regulation (MMR) – General guidance for installations

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

Other, please specify (SEAI – Energy in Ireland 2020 Report - <https://www.seai.ie/publications/Energy-in-Ireland-2020.pdf> )

**C6. Emissions data**

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**C6.1**

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**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**

1049561.7

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

For this total CO2e conversion factor for Huntstown 1 & 2 is from the verified greenhouse gas COe which is calculated from the carbon content of the various gas components from the gas chromatograph analysis at the site. The GHG Conversion Factors for Company Reporting is used for other data across scopes 1, 2 and 3, e.g. company vehicles

C6.2

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**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**

We are not reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

Market-based figures are what has been published in our Responsible Business Report

C6.3

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**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**

<Not Applicable>

**Scope 2, market-based (if applicable)**

39

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

Includes gas for heating and also electricity

C6.4

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**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

No

C6.5

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**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**



## Purchased goods and services

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

7

### Emissions calculation methodology

Average data method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

96

### Please explain

Water data obtained from supplier for 6 months at one of our NI offices and from water meters on site at Huntstown. Other sites usage estimated based on volume per person NI office (since these are all office sites). Antrim 6 months and Huntstown = 6.771 of total 7.059=96%

## Capital goods

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This area has not yet been fully evaluated. Procurement of equipment such as turbines for renewables sites or power plant facilities will need to be considered and key suppliers identified.

## Fuel-and-energy-related activities (not included in Scope 1 or 2)

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

All fuel and energy related activities have been included in scope 1 and 2.

## Upstream transportation and distribution

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Not considered to be substantial but may look in the future at calculating GHG emissions from e.g. delivery of construction materials, fuels and smaller deliveries such as office supplies.

## Waste generated in operations

### Evaluation status

Not relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

0.1

### Emissions calculation methodology

Waste-type-specific method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

67

### Please explain

Emission only from waste to landfill from shared office buildings in Dublin based on waste report from management company in one of the offices and estimated for others. Liberty 0.070054 t CO<sub>2</sub>e of total 0.10427 t Co<sub>2</sub>e= 67%

## Business travel

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

44

### Emissions calculation methodology

Spend-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### Please explain

This includes grey fleet and flights. Business mileage for grey fleet is calculated based on total value claimed by staff and an average mileage rate is applied to calculate number of miles travelled. Assumption of a 'Passenger vehicle Unknown fuel (lower medium)' for conversion factor. Flight data is based on claims for flights and relevant staff are contacted by email to confirm flight destination.

## Employee commuting

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

We are in the process of collecting this data through a survey embedded in a recent environmental training course (May 2022)

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Data on energy use from leased buildings has been included in scope 2.

## Downstream transportation and distribution

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Delivered product is electricity or gas. From the facility boundary (meter point) the power is "notionally" in the wholesale market (pool). Transmission losses would be the responsibility of the TSO / DSO. Could consider waste removal but not considered to be substantial

## Processing of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As products are electricity and gas further processing is not carried out

## Use of sold products

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

540441.8

### Emissions calculation methodology

Fuel-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Emissions from ROI Gas Sales. Conversion factors from the SEAI, 'Energy in Ireland Report 2020'

## End of life treatment of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Not relevant in electricity/gas supply industry

## Downstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

We do not have any downstream leased assets

## Franchises

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Franchises do not form part of our business

## Investments

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

No materially significant investments- our investments are all in our own assets/projects.

**Other (upstream)**

**Evaluation status**

Please select

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (downstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

C6.7

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(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

C6.10

---

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

**Intensity figure**

326

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

1049600.68

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

3221.7

**Scope 2 figure used**

Market-based

**% change from previous year**

48

**Direction of change**

Decreased

**Reason for change**

Intensity figure is tCo2e per million Euro revenue. Change due to increased revenues due to market changes and reduced gas emissions from Huntstown power plant due to outage - unit 2 did not operate from Feb 21- Oct 21 due to the main transformer failing.  $1049600.68 \text{ t Co2e} / \text{€}3221.7 = 326 \text{ t Co2e per million Euro revenue. (previous year- } 1,196,240.33 \text{ t Co2e} / \text{€}1899.1)$

---

**Intensity figure**

1094.3

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

1049600.68

**Metric denominator**

full time equivalent (FTE) employee

**Metric denominator: Unit total**

959.15

**Scope 2 figure used**

Market-based

**% change from previous year**

19

**Direction of change**

Decreased

**Reason for change**

Increase in staff numbers, home working, reduced gas from Huntstown power plant due to outage - unit 2 did not operate from Feb 21- Oct 21 due to the main transformer failing.  $1049600.68 / 959.15 = 1094 \text{ t Co2e per FTE (previous year } 1,196,260.39 / 884.42)$

---

**Intensity figure**

0.329

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

1049600.68

**Metric denominator**

megawatt hour generated (MWh)

**Metric denominator: Unit total**

3183000

**Scope 2 figure used**

Market-based

**% change from previous year**

0.09

**Direction of change**

Decreased

**Reason for change**

No significant change. (Previous year  $1,196,260.39 \text{ t Co2e} / 3,631,000 \text{ MWh generated}$ )

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## C7. Emissions breakdowns

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### C7.1

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**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

No

**C7.2**

**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO2e)
Ireland	1049531
United Kingdom of Great Britain and Northern Ireland	31

**C7.3**

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

By business division

**C7.3a**

**(C7.3a) Break down your total gross global Scope 1 emissions by business division.**

Business division	Scope 1 emissions (metric ton CO2e)
Flexible Generation	1049496.7
Renewables	60.63
Customer Solutions	4.38

**C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4**

**(C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.**

	Gross Scope 1 emissions, metric tons CO2e	Net Scope 1 emissions , metric tons CO2e	Comment
Cement production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Chemicals production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Coal production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Electric utility activities	1049561.7	<Not Applicable>	Includes company vehicles, oil and gas for production and F-Gas
Metals and mining production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Oil and gas production activities (upstream)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Oil and gas production activities (midstream)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Oil and gas production activities (downstream)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Steel production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport OEM activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport services activities	<Not Applicable>	<Not Applicable>	<Not Applicable>

**C7.9**

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Decreased

**C7.9a**

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	
Other emissions reduction activities	0	No change	0	
Divestment	0	No change	0	
Acquisitions	0	No change	0	
Mergers	0	No change	0	
Change in output	146660	Decreased	12	(146,660/1,196,260.39) * 100 Unit 2 did not operate from Feb 2021 to mid Oct 2021 due to the main transformer failing
Change in methodology	0	No change	0	
Change in boundary	0	No change	0	
Change in physical operating conditions	0	No change	0	
Unidentified	6.77	Decreased	0.001	(6.77/1,196,260.39) * 100 Nominal decrease in emissions from company vehicles
Other	42.06	Increased	0.004	F-Gas, electricity and gas increased slightly while oil (for office heating) decreased. 42.06/1,196,260.39 * 100= 0.004% Gas data for 2 buildings- Liberty and Greenwood not recorded before 21/22 and other increases largely due to return to office working.

### C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

### C8. Energy

#### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

Don't know

#### C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

#### C8.2a

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	Unable to confirm heating value	0	5106832.31	5106832.53
Consumption of purchased or acquired electricity	<Not Applicable>	4626.21	0	4626.21
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	0	<Not Applicable>	0
Total energy consumption	<Not Applicable>	4626.21	5106832.31	5111458.52

#### C8.2b

**(C8.2b) Select the applications of your organization's consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	Yes
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

**C8.2c**

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

**Sustainable biomass**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Other biomass**

**Heating value**

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Other renewable fuels (e.g. renewable hydrogen)**

**Heating value**

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**



**Coal**

**Heating value**

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Oil**

**Heating value**

Unable to confirm heating value

**Total fuel MWh consumed by the organization**

3768.85

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Gas**

**Heating value**

Unable to confirm heating value

**Total fuel MWh consumed by the organization**

5103063.46

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Other non-renewable fuels (e.g. non-renewable hydrogen)**

**Heating value**

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Total fuel****Heating value**

Unable to confirm heating value

**Total fuel MWh consumed by the organization**

5106832.31

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

&lt;Not Applicable&gt;

**MWh fuel consumed for self- cogeneration or self-trigeneration**

&lt;Not Applicable&gt;

**Comment****C-EU8.2d**

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(C-EU8.2d) For your electric utility activities, provide a breakdown of your total power plant capacity, generation, and related emissions during the reporting year by source.

**Coal – hard****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment****Lignite****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment****Oil****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

990.14

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

Oil used as part of testing for mandatory secondary fuel requirements as gas fired power stations in Ireland. Testing required by TSO and regulatory authorities

**Gas**

**Nameplate capacity (MW)**

764

**Gross electricity generation (GWh)**

**Net electricity generation (GWh)**

2543.3

**Absolute scope 1 emissions (metric tons CO2e)**

1048447

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

412

**Comment**

1,048,447 t CO2e /2,543.3 GWh net generation= 412 t CO2 e per GWh

**Sustainable biomass**

**Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

**Other biomass**

**Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

**Waste (non-biomass)**

**Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

**Nuclear**

**Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

**Fossil-fuel plants fitted with CCS****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment****Geothermal****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment****Hydropower****Nameplate capacity (MW)**

0

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

0

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment****Wind****Nameplate capacity (MW)**

309

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

643.8

**Absolute scope 1 emissions (metric tons CO2e)**

0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

0

**Comment**

Relates to the generation volume from Energia Group's owned and operated windfarms. This excludes over 900 MW of onshore wind capacity managed by Energia Group through Power Purchase Agreements

**Solar**

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

0

**Comment**

**Marine**

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

0

**Comment**

**Other renewable**

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

0

**Comment**

**Other non-renewable**

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

0

**Comment**

**Total**

**Nameplate capacity (MW)**

1073

**Gross electricity generation (GWh)**

0

**Net electricity generation (GWh)**

3187.1

**Absolute scope 1 emissions (metric tons CO2e)**

1049437.14

**Scope 1 emissions intensity (metric tons CO2e per GWh)**

412

**Comment**

All (100%) of Energia Group's electricity generation comes from efficient gas-fired CCGTs at Huntstown (764 MW) and onshore wind projects (309 MW) on the island of Ireland.

**C8.2g**

---

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

Ireland

**Consumption of electricity (MWh)**

3631.8

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3631.8

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

United Kingdom of Great Britain and Northern Ireland

**Consumption of electricity (MWh)**

994.4

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

994.4

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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**C-EU8.4**

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**(C-EU8.4) Does your electric utility organization have a transmission and distribution business?**

No

**C9. Additional metrics**

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**C9.1**

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**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

Waste

**Metric value**

0.1

**Metric numerator**

tonnes CO2e

**Metric denominator (intensity metric only)**

**% change from previous year**

69

**Direction of change**

Decreased

**Please explain**

Whilst Energia Group do promote avoidance and reduction of waste in our offices it should be noted that due to COVID-19 the occupancy of our offices was significantly reduced which will have been a factor in the significant decrease in waste to landfill.

---

**Description**

Energy usage

**Metric value**

38.98

**Metric numerator**

tonnes CO2e

**Metric denominator (intensity metric only)**

**% change from previous year**

72

**Direction of change**

Increased

**Please explain**

In FY21 there was very little occupancy in the offices due to COVID. This increased in FY22. In addition, a data gap was identified in FY22 which meant that there was an additional 23.99 tCO2e that had previously been unaccounted for. In Energia Group we promote energy efficiency and awareness and encourage employees to conserve energy and reduce waste where possible in order to reduce our environmental impact.

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C-EU9.5a

**(C-EU9.5a) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.**

**Coal – hard**

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

not applicable

**Lignite**

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable

**Oil**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

**Gas**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

6713000

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

18.4

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0.6

Explain your CAPEX calculations, including any assumptions

Figures are taken from internal financial forecasts and maintenance schedules.

**Sustainable biomass**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

**Other biomass**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

**Waste (non-biomass)**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

**Nuclear**

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable



#### Geothermal

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

#### Hydropower

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

Not applicable

#### Wind

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

7612000

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

20.8

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

78.4

Explain your CAPEX calculations, including any assumptions

Based on Energia Group's pipeline of onshore wind projects, assumes 300 MW of new onshore wind build out over next 5 years.

#### Solar

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

20.3

Explain your CAPEX calculations, including any assumptions

Based on Energia Group's pipeline of solar projects, assumes 600 MW of new solar capacity will be constructed and operational in the next 5 years.

#### Marine

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

#### Fossil-fuel plants fitted with CCS

CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)

0

CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

Explain your CAPEX calculations, including any assumptions

not applicable

**Other renewable (e.g. renewable hydrogen)**

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

2169000

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

5.9

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0.1

**Explain your CAPEX calculations, including any assumptions**

One hydrogen plant and fuelling station built out in 2022.

**Other non-renewable (e.g. non-renewable hydrogen)**

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

20040000

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

54.9

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0.6

**Explain your CAPEX calculations, including any assumptions**

To support system operation, the Group is also developing 50MW of battery storage outside Belfast at Castlereagh. Large-scale battery storage on the all-island system will facilitate the further integration of renewable electricity on the grid to meet customers' demands. At Castlereagh in Co. Down, work is ongoing at the Group's first battery storage project.

**C-EU9.5b**

**(C-EU9.5b) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).**

Products and services	Description of product/service	CAPEX planned for product/service	Percentage of total CAPEX planned products and services	End of year CAPEX plan
Other, please specify (Digitalisation)	Digitalisation also continues to be a long-term strategic priority for the Group and during the year we embarked upon the development of a Digital IQ platform. Digital IQ is the Group's as a service platform accelerating the shift to zero carbon. From advanced billing to smart electric vehicle charging, the Digital IQ platform will empower the Group to provide a more efficient and personalised service to its customers. This real-time cloud platform will transform the Customer Solutions business by helping reduce cost to serve, boosting customer engagement and enabling decarbonisation through smart, low carbon energy technologies.	12194000	60	2027
Other, please specify (Smart Metering)	In support of the Smart Metering programme in Ireland, where smart meters are being installed in all homes and small businesses, Energia has successfully deployed new "time of use" products to customers and work is ongoing to further develop opportunities offered by smart meters.	5053000	26	2027

**C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6**

**(C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

Row	Investment in low-carbon R&D	Comment
1	Yes	Energia group is an active member of the Belfast Maritime Consortium. Building on the work of the emerging Belfast Maritime Consortium as a global centre of excellence for zero-emission maritime technology, the Northern Ireland Green Seas consortium has leveraged their experience to identify and investigate zero-emission solutions for port and vessel operations. Various scenarios have been developed to assess the optimal decarbonisation strategy for a large transport and freight port (Belfast Harbour), a small leisure port (Bangor Marina) and a remote island harbour (Rathlin Island). Energia Group plays a critical role in this feasibility study. The study considered practical scenarios to determine the energy requirements and Net Zero pathways for each location by 2050. These include battery energy storage, green hydrogen production and bunkering, shore side electrical grid infrastructure and renewable energy supply. This project integrates renewable resource, technology, and maritime heritage to place Northern Ireland (NI) at the forefront of the shipping industry once again by serving as the blueprint for the future of zero emission maritime. This feasibility study is the roadmap for zero emission maritime in Northern Ireland and provides a credible plan to deliver upon this mission. Ports and marinas across the UK, and globally, will be connected at different electrical points in the electricity system typology. In some maritime locations it will be relatively easy to upgrade the electrical infrastructure however other locations could require challenging upgrades (technically and/or financially) and the development timelines for the same could become a significant barrier.

**C-CO9.6a/C-EU9.6a/C-OG9.6a**

(C-CO9.6a/C-EU9.6a/C-OG9.6a) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.

Technology area	Stage of development in the reporting year	Average % of total R&D investment over the last 3 years	R&D investment figure in the reporting year (optional)	Comment
Renewable energy	Applied research and development	≤20%		<p>The project that Energia group is involved has addressed the location specific variations in infrastructure by evaluating three very different maritime locations in Northern Ireland: a large transport and freight port (Belfast Harbour), a small leisure port (Bangor Marina) and a remote island harbour (Rathlin Island). The feasibility study was a success in determining the potential energy, infrastructure, and renewable energy supply requirements. As a result, Northern Ireland is the perfect region to demonstrate smart maritime energy infrastructure by utilising solutions which can also be deployed in maritime locations across the UK and beyond.</p> <p>Building on the success of the feasibility study, the fully costed demonstration project outlined will be the first of this kind in Northern Ireland and will be supported by Energia Group. The demonstration project will address the infrastructure requirements for decarbonising Belfast Harbour's port and vessel operations in both the short and long term as well as developing local expertise need to decarbonise the wider Northern Ireland Economy.</p> <p>It is envisaged that decarbonising Belfast Harbour will not only deliver on the UK Government's 10 Point Plan for a green industrial revolution, but also actively support the achievement of NI's ambitious energy strategy, specifically relating to developing a hydrogen economy and wider reduction in the use of fossil fuels. Outputs of the feasibility study indicate that the NI Green Seas consortium can make significant inroads in decarbonising the maritime sector in Northern Ireland. This demonstration project will determine the viability of achieving such an important objective.</p>

## C10. Verification

### C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	No third-party verification or assurance
Scope 3	No third-party verification or assurance

### C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Underway but not complete for reporting year – previous statement of process attached

**Type of verification or assurance**

Third party verification/assurance underway

**Attach the statement**

Verifiers Report Unit 1 2021GHG-080 VOS 050222.pdf

Verifiers Report Unit 2 2021GHG-152 VOS 060222.pdf

**Page/ section reference**

The attached Verification Statements detail the external verification for fiscal year 2021 for each of the power plants operated by Energia (Huntstown Power Station and Huntstown Power Station Phase II). Page 1 of each document specifies the plant ID, permit number, approving competent authority and the total scope 1 direct verified CO2e emissions for fiscal 2021. Page 4 specifies the verification opinion of the verifier - (verified as satisfactory)

**Relevant standard**

European Union Emissions Trading System (EU ETS)

**Proportion of reported emissions verified (%)**

100

### C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?

No, we do not verify any other climate-related information reported in our CDP disclosure

## C11. Carbon pricing

## C11.1

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**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

Yes

## C11.1a

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**(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.**

EU ETS

## C11.1b

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**(C11.1b) Complete the following table for each of the emissions trading schemes you are regulated by.**

### EU ETS

**% of Scope 1 emissions covered by the ETS**

100

**% of Scope 2 emissions covered by the ETS**

0

**Period start date**

April 1 2021

**Period end date**

March 31 2022

**Allowances allocated**

**Allowances purchased**

980000

**Verified Scope 1 emissions in metric tons CO2e**

1049753

**Verified Scope 2 emissions in metric tons CO2e**

0

**Details of ownership**

Facilities we own and operate

**Comment**

The reason the purchases are less than the emissions is due to a timing difference as the compliance year runs January to December and our financial year runs April to March. In accordance with the relevant requirements, Energia Group purchases allowances for 100% of the verified Scope 1 emissions.

## C11.1d

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**(C11.1d) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?**

Energia Group participates in the Emissions Trading Scheme (ETS) and purchases Carbon Emission Union Allowances (EUAs) in accordance with the output of the two thermal generation assets Huntstown 1 (HTN1) and Huntstown 2 (HTN2) alongside internal hedging strategies. As part of our positive energy programme of investment we continue to build out our renewable portfolio including onshore and off shore wind, solar, hydrogen while continuing to utilise our flexible thermal generation thus supporting Ireland's energy transition. We aim to produce energy with a carbon intensity of 135gCO2/kWh by 2030 placing us on a pathway to achieving net zero.

## C11.2

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**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

## C11.3

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**(C11.3) Does your organization use an internal price on carbon?**

No, and we do not currently anticipate doing so in the next two years

## C12. Engagement

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## C12.1

### (C12.1) Do you engage with your value chain on climate-related issues?

Yes, our customers/clients

## C12.1b

### (C12.1b) Give details of your climate-related engagement strategy with your customers.

#### Type of engagement & Details of engagement

Education/information sharing	Run an engagement campaign to educate customers about the climate change impacts of (using) your products, goods, and/or services
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#### % of customers by number

30

#### % of customer - related Scope 3 emissions as reported in C6.5

5

#### Please explain the rationale for selecting this group of customers and scope of engagement

Energia Group have sponsored RTE One's (National Broadcaster) Cheap Irish Homes (television programme) for the last two years. The show engineering and building design experts find Ireland's Cheapest Homes and shine a light on the secret side of the Irish property market, helping house hunters find the best hidden property gems under €200k. The show sponsorship allows Energia to position itself as a one stop shop for home energy upgrades, big or small and has driven increased awareness of our deep retrofit services.

#### Impact of engagement, including measures of success

The sponsorship includes branded stings on every ad break along with RTE guide and RTE.ie advertising formats. With each average episode reaching 358,388 viewers and an average of 25% of the available audience share, the show provides a perfect mass market approach for Energia to build greater awareness of our retrofit offering, an offering that helps homes be more energy efficient and reduces the carbon emissions through energy conservation. 10,000 tonnes of CO2 have been saved through funding of customers' energy efficiency projects.

#### Type of engagement & Details of engagement

Education/information sharing	Run an engagement campaign to educate customers about your climate change performance and strategy
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#### % of customers by number

2

#### % of customer - related Scope 3 emissions as reported in C6.5

#### Please explain the rationale for selecting this group of customers and scope of engagement

A series of climate action workshops were delivered in Portlaoise, Co Laois Ireland to support the low-carbon town initiative. The workshops were curated, delivered and evaluated by Midlands Science, with all appropriate project management and communications, in liaison with stakeholders. All primary and secondary schools in Portlaoise were contacted about this opportunity and links with the curriculum were stressed where appropriate. For example, the topics addressed at primary level links directly to key points in the Social, Environmental and Scientific Education strands such as human life, plant and animal life, environmental awareness and care for the environment. At primary level this was Holy Family Senior Schools, Marborough NS, Gael Scoil Phort Laoise and Scoil Bhríde. This was a total of 14 classes at senior level – approximately 420 students and 14 teachers.

Electric cars - batteries, pros & cons, charging points.

Energy - wind, solar, hydro and tidal.

Electric cars - people's attitudes to electric cars and how to help encourage them to try one. Oceans - sea level rise and animals in the arctic

Electric cars - how batteries work, advantages

The most valuable output is the students' enhanced knowledge about climate change and climate action but also the feeling of empowerment of understanding everyone can play a role and take responsibility for actions in their own lives that contribute to climate action.

For secondary school level, 3 secondary schools took part in workshops facilitated by Phil Smyth of RTE's School Hub. The schools were Dunamase College, Scoil Christ RI and Portlaoise, a total of 4 classes all at TY stage, approximately 120 students.

#### Impact of engagement, including measures of success

A survey undertaken with participants demonstrated that 75% of participants now felt they could make a difference in climate change issues. Asked to describe what climate change meant to them, the word the most frequent responses from participants – included weather changing, fossil fuels, animal extinction and ice caps melting. It is interesting that even at a younger age, awareness of the link between climate change and biodiversity is strong. The project received extensive regional media coverage in the Leinster Express; Putting Portlaoise schools at the centre of climate action and the Laois People; Portlaoise kids to benefit from special Science Education Outreach Programme. The coverage focused on the partnership between Energia, Midlands Science and Laois County Council and stressed that the Climate Action Plan is Ireland's roadmap to becoming a climate neutral economy and resilient society by 2050. It also focused the fact that Portlaoise has been designated as Ireland's first Low Carbon Town under both the National Development Plan – Ireland 2040 and the Climate Action Plan 2019

#### Type of engagement & Details of engagement

Education/information sharing	Run an engagement campaign to educate customers about the climate change impacts of (using) your products, goods, and/or services
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#### % of customers by number

1

#### % of customer - related Scope 3 emissions as reported in C6.5

#### Please explain the rationale for selecting this group of customers and scope of engagement

Ireland's Greenest Fan was an initiative delivered in partnership with Irish Rugby. As proud energy partners of the Irish Rugby team, Energia wanted to engage rugby fans around the topic of the environmental impact of attending games, and make suggestions to them on how they could reduce that impact and reduce their carbon emissions in

the future. By fulfilling the survey, fans also entered into a draw to win tickets to the Autumn Series, so fans were incentivised to partake. The initiative was about raising awareness of the environmental impact of people watching the rugby games . A survey was conducted on those watching the game at home and at the Rugby stadium and we measured the environmental impact of those who travelled to the game, and the impact saved by those who chose to watch from home.

Impact of engagement, including measures of success : nearly 1,000 fans took the survey and we have a baseline to measure against for future activation games.

**Impact of engagement, including measures of success**

Nearly 1,000 fans took the survey and we have a baseline to measure against for future activation games.

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**Type of engagement & Details of engagement**

Please select

**% of customers by number**

**% of customer - related Scope 3 emissions as reported in C6.5**

**Please explain the rationale for selecting this group of customers and scope of engagement**

The Northern Ireland Sustainable Energy Programme (NISEP) is funded from money collected from all electricity customers through a Public Service Obligation (PSO), and the fund is used to provide funding for energy efficiency schemes. Power NI received funding to administer a number of commercial schemes in the last year, these included: LED Lighting; Intelligent Heating Controls, Variable Speed Technology and Voltage Optimisation.

**Impact of engagement, including measures of success**

A total of 230 businesses applied for funding of which, 43 availed of the grant schemes over the last financial year to the value of approximately €125,000, resulting in almost 50 GWh of lifetime savings and delivering lifetime savings of 11,030 tCO2e.

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**C12.2**

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**(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

No, but we plan to introduce climate-related requirements within the next two years

**C12.3**

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**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

## Row 1

### Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate

Yes, we engage directly with policy makers

Yes, we engage indirectly through trade associations

### Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?

Yes

### Attach commitment or position statement(s)

Link to Responsible Business Report FY 2022 [https://www.energiagroup.com/globalassets/document-library/fy22/energia\\_group\\_responsible\\_business\\_report\\_21-22.pdf](https://www.energiagroup.com/globalassets/document-library/fy22/energia_group_responsible_business_report_21-22.pdf)

Link to Annual Financial Report <https://www.energiagroup.com/globalassets/document-library/fy22/annual-report-fy22.pdf> ]

### Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy

Stakeholder Mapping, Engagement & Materiality Assessment

As the development and implementation of Energia Group's Environment, Social & Governance Strategy continues we understand how important our stakeholder views are. As a Group, we engage with a broad range of internal and external stakeholders including; our employees, commercial and residential customers, communities, regulators, industry groups, investors, NGOs, academia; rating agencies and other organisations that affect, or could be affected by, our activities and services. A critical element of our strategy is to understand the issues that are perceived to be most important or material to our stakeholders. In 2022 we conducted our first Materiality Assessment for ESG related matters which included a detailed questionnaire relating to Climate Action.

The materiality assessment was conducted using the following process:

1. We carried out a peer review and analysis of ESG frameworks to understand issues of materiality in the energy sector
2. We compiled a list of issues of materiality relevant to our sector.
3. We divided the issues of materiality into the following categories
  - a. Environment – Climate Action
  - b. Environmental Impact
  - c. Social – Community
  - d. Social – Our People
  - e. Social – Our Customers
  - f. Governance – The Way We Work

The Materiality Assessment survey was shared with our stakeholders and their responses helped to inform the ongoing development and implementation of our ESG Strategy. The materiality issues have been prioritised based on input from both internal and external stakeholders. Overall the results indicate that our stakeholders view a range of Environmental, Social and Governance factors as being important to Energia Group. The top 10 issues are listed as follows; Health and Safety; Decarbonising the Energy System; Security of Supply; Regulatory Responsibility; Onshore Wind Farm Development; Cyber Security; Affordable & Green Energy; Offshore Wind Farm Development; Community Engagement and Community Liaison.

Energia Group engages with local elected representatives, national elected representatives including Ministers through updates and briefings and at project information clinics. As an example our offshore renewable energy wind farm team Group Strategy industry workshops, direct engagements with elected rep

### Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

<Not Applicable>

### Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

<Not Applicable>

## C12.3a

### (C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?

#### Focus of policy, law, or regulation that may impact the climate

Renewable energy generation

#### Specify the policy, law, or regulation on which your organization is engaging with policy makers

The legislation and policy to support the development of offshore wind in Ireland is work in progress. Energia Group has two offshore windfarms that can contribute to the achievement of the 5 GW offshore wind target set by the Irish Government. Important areas Energia Group has engaged with policy makers on:

1. Irish Government's Climate Action Plan 2021
2. Maritime Area Planning Act 2021
3. Facilitation of 2030 targets

On the Climate Action Plan, Energia Group called for an increase in the Government's target from 3.5 GW in the 2019 Plan to at least 5 GW.

The Maritime Area Planning Act 2021 introduced the new planning and consenting regime for offshore wind. Energia Group supported the Act but called on policy makers to make changes to recognise the proximity of 2030 in the context of offshore wind project development and the need to ensure the removal of arbitrary impediments to projects capable of contributing to the 2030 target from progressing through the consenting and planning processes.

Energia Group also engaged with policy makers more widely on the achievement of the 2030 target and the need to accelerate the processes and frameworks required to support the development of at least 5 GW of offshore wind by 2030.

#### Policy, law, or regulation geographic coverage

National

#### Country/region the policy, law, or regulation applies to

Ireland

#### Your organization's position on the policy, law, or regulation

Support with major exceptions

#### Description of engagement with policy makers

A series of meeting with senior policy makers, advisors and politicians, including the responsible Minister, in relation to:

1. Irish Government's Climate Action Plan 2021 and the need to revise upwards the offshore target to at least 5 GW for 2030 and ensure sufficient projects are included in the relevant processes to ensure a competitive outcome.
2. Maritime Area Planning Act 2021 and the important role it will play in the achievement of Ireland's 2030 offshore wind target.

3. Facilitation of 2030 targets and the need to ensure the policy and legislation supports the achievement of the 2030 targets.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

While Energia Group supports the policy and legislative developments in relation to Ireland's nascent offshore wind sector in 2021, we believe changes to these policies are required to accelerate the development of the required level of offshore wind capacity to meet the 5 GW target and ensure this is done in a competitive and cost-effective way. The Irish Government is currently prioritising c.3.5 GW of offshore capacity but in the remaining time to 2030, all projects capable of contributing to the 2030 target must be given a clear pathway to to achieve full consenting, planning, grid and route to market.

At the moment, the additional projects required to achieve the 5 GW target are unable to progress as the Irish Government has not published a policy on these projects and is in the process of establishing a new regulatory authority - the Maritime Area Regulatory Authority - that will manage the consenting process. Unless these changes occur urgently, the achievement of government's target and the acceleration of Ireland's decarbonisation will not be possible. Energia Group is committed to the achievement of both of these goals and will continue to push for the required changes and developments in policy.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Electricity grid access for renewables

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Energia Group has 309 MW of operating onshore wind capacity across the island of Ireland and a pipeline of new onshore wind and solar projects that will increase the installed capacity by over 1,000 MW by 2030. Despite the governments in Ireland and Northern Ireland setting ambitious targets for new onshore renewables by 2030 (80%), both the current and planned level of investment in grid infrastructure is insufficient to achieve these targets and promote the level of investment required. Energia Group has engaged with senior policy makers, politicians, regulators and Transmission System Operators (TSOs) on the island of Ireland on the urgent need to increase grid capacity to ensure the 80% target can be achieved and to ensure the sector is investable.

For Energia Group's existing 309 MW of onshore wind, these projects experience significant volumes of constraints (56 GWh) - i.e. inability to export electricity due to insufficient grid capacity. Forecasts of constraints for new projects are considerably worse. The TSOs in Ireland have published a high-level plan to get to 70% renewable electricity - Shaping Our Electricity Future - but this plan is insufficient both in terms of achieving the 80% target and for encouraging new investments as the "lost" electricity impacts negatively on the projects investment case.

Energia Group has engaged directly and indirectly, through industry groups, to ensure the grid development plans are fit for purpose.

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

Ireland

United Kingdom of Great Britain and Northern Ireland

**Your organization's position on the policy, law, or regulation**

Support with major exceptions

**Description of engagement with policy makers**

Energia Group has engaged with senior policy makers, politicians, regulators and Transmission System Operators (TSOs) on the island of Ireland on the urgent need to increase grid capacity to ensure the 80% target can be achieved and to ensure the sector is investable. These engagements have happened directly and indirectly through industry groups.

The engagements have focused on the shortcomings in the current system, in the plan to 2030 and the inconsistencies between the high-level plans and the governments' ambitions.

The engagements have taken place in person, online and in the form of correspondence.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Energia Group supports the overall objective of investing in the electricity grid to facilitate the increased penetration of renewable electricity and the achievement of wider decarbonisation objectives. However, the high-level plan produced to date is insufficient to achieve the ambition and in places conflicts with policy. It is also not a detailed plan and provides little certainty to investors.

Energia Group believes the required level of investment in grid infrastructure is significantly higher than is currently planned for. The TSO must show greater ambition in terms of the level of new investment required and the need to minimize the "lost" energy from system constraints. The plan should not focus on 2030 as an end point but as a checkpoint to deeper and further decarbonisation and progress towards a 100% renewable electricity system.

The introduction of "private wire" legislation and the facilitation of planned offshore grid connections by developers should also feature in both policy, legislation and regulation.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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C12.3b

**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

**Trade association**

BusinessEurope

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

Energia Group engages with BusinessEurope through our membership of Ibec, the Irish member federation of BusinessEurope. Ibec is Ireland's largest lobby and business representative group. Ibec's purpose is to help build a better, sustainable future by influencing, supporting and delivering for business success.

BusinessEurope is committed to and aware of the challenges that climate change presents as well as the impacts of human activities. They highly welcomed the Paris Agreement, which reflects the long-term objective of limiting global warming below 2°C and BusinessEurope is fully committed to implementation of the Agreement. The companies it represents invest billions in low-carbon innovation, as well as in the development and deployment of low-carbon technologies for the future.

Ibec's policy team leads the dialogue with Government and the EU, including BusinessEurope meetings, on climate and energy, focusing on an economically viable and co-



ordinated low carbon transition, delivery of vital national energy infrastructure, transparent and fair regulation and a cost-competitive industrial power supply. Ibec has a number of networks for members to input into their climate related policy-making process; Energy and Climate Policy Committee, of which Energia Group's Head of Corporate Affairs is the Vice Chair. Energia Group is also a member of the Confederation of British Industry (CBI), the member federation of BusinessEurope covering Northern Ireland and Energia Group is a member of the CBI (NI) Energy Committee. Energia Group supports the focus and objectives of BusinessEurope, Ibec and CBI on climate change.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**  
0

**Describe the aim of your organization's funding**  
<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**  
Yes, we have evaluated, and it is aligned

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**Trade association**  
WindEurope

**Is your organization's position on climate change consistent with theirs?**  
Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**  
We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**  
Energia Group is part of WindEurope through membership of Wind Energy Ireland (WEI), the constituent member for Ireland and RenewableNI (RNI; part of RenewableUK) the constituent member for Northern Ireland. WindEurope regards wind energy as the most efficient solution to reduce emissions in the power sector. It already provides for decarbonisation while contributing to economic growth in many countries proving it will continue to be a leading solution against climate change globally. Wind energy also contributes significantly in reducing energy dependence, increasing energy security and reducing fuel imports bills. WEI and RNI are committed to the promotion and education of wind energy issues and plays a leading role in the areas of conference organisation, lobbying and policy development on the island of Ireland. WEI/RNI are committed to promoting the use of wind energy in Ireland and beyond as an economically viable and environmentally sound alternative to thermal or nuclear generation. In 2021 the MD of Energia Renewables was a board member and director of WEI, and Energia Group is also a permanent member of the WEI governing Council. Energia Group is a very active participant in many of the WEI/RNI Committees and Working Groups, dedicating time and resources to working with our peers to promote the interests of the industry. As one example, the Energia Renewables Community Engagement Manager represents the Group on the Wind Energy Ireland Community and Engagement Committee and participates in the WEI Community Benefit and Offshore Engagement and Communications working groups. WEI regularly reviews and updates its best practice guidelines on all aspects of community engagement. The committee has been liaising with the Department of Energy and Climate Change and SEAI through meetings and public consultation responses to help shape new guidelines and community benefit fund development, in addition to the community engagement requirements built into the Government's Renewable Energy Support Scheme, or RESS. Energia Group supports the focus and objectives of WindEurope, WEI and RNI on climate change.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**  
0

**Describe the aim of your organization's funding**  
<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**  
Yes, we have evaluated, and it is aligned

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**Trade association**  
Eurelectric

**Is your organization's position on climate change consistent with theirs?**  
Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**  
We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**  
Energia Group is part of Eurelectric through membership of the Electricity Association of Ireland (EAI), the constituent member for the island of Ireland at Eurelectric. An EAI representative is on the Board of Eurelectric and Energia Group is a board member of EAI. The Eurelectric position on climate is Electrification is the solution to climate change and energy security. Rapid decarbonisation is the solution to limiting warming and preventing the worst impacts of climate change. Moreover, achieving this goal through the mass rollout of renewables and electrification can also increase Europe's energy security. The EAI is the representative body for the electricity industry and gas retail sector operating on the Island of Ireland. EAI is an all-island organisation that provides a source of expert advice on industry matters and works to enhance the industry's reputation. Electricity has a fundamental role in providing energy services in a decarbonised, sustainable future, in particular through the progressive electrification of transport and heating. We believe this can be achieved, in the overall interest of society, through competitive markets that foster investment and innovation. Energia Group hold the vice chair position on two of EAI's three main committees - Markets and Policy - and play an active role in the Retail committee. Energia Group is a very active participant in all of EAI's activities, committees and working groups, dedicating time and resources to working with our peers to promote the interests of the industry. Energia Group supports the focus and objectives of Eurelectric and EAI on climate change.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**  
<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**  
Yes, we have evaluated, and it is aligned

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## C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

### Publication

In mainstream reports

### Status

Complete

### Attach the document

energia\_group\_responsible\_business\_report\_21-22.pdf

energia\_group\_responsible\_business\_report\_21-22.pdf

### Page/Section reference

Pg 6 - Highlights

Pg 7 & 9 - Alignment to the SDGs & ESG

Pg 11 - Materiality matrix

Pg 12 Climate risk and Opportunity

Pg 15 - 24 Powering climate action, emissions, targets and COP 26

Pg 26 - 29 Supporting customers in their energy transition journey

Pg 38-39 Supporting communities through community wind farm funds and engaging communities in our offshore wind projects

Pg 43 Raising awareness of the impact of travel to sports events through our sports sponsorships

Pg 45 Governance

### Content elements

Governance

Strategy

Risks & opportunities

Emissions figures

Emission targets

Other metrics

### Comment

Energia Group has published its second Responsible Business Report outlining many of the steps the Group is taking to promote sustainability and operate as a responsible business. This year's report builds on the disclosures contained in last year's report and aligns the Group's activities to the UN Sustainable Development Goals. The Report also includes details of the Group's new science-based carbon reduction target for 2030. Energia Group CEO statement - "Sustainability is at the core of our business and our new carbon target to 2030 demonstrates our commitment to climate action and facilitating the achievement of governmental targets in Ireland and Northern Ireland. We have an excellent track record in the delivery of energy projects, serving customers and positively engaging with communities; and we are approaching the energy transition with the same enthusiasm and commitment. Through the work and dedication of all at Energia Group, our strategy and approach will make a positive contribution to life on this island."

Key highlights :

- ✓ A new science-based carbon reduction target. Energia Group will reduce the carbon intensity of electricity generation by 50% by 2030.
- ✓ A threefold increase in the volume of renewable electricity the Group will generate from onshore wind and solar projects in 2030. In addition, the development of two offshore wind projects with combined capacity of up to 1,600 MW.
- ✓ Alignment of the Group's activities with the UN Sustainable Development Goals and the completion of a stakeholder mapping exercise and materiality assessment.
- ✓ The important contribution being made by the Huntstown units to security of supply and the progress made on the Group's two offshore wind projects, as well as on new onshore wind and solar projects.
- ✓ 7.8TWh electricity supplied to over 820,000 customers and almost 10,000 tonnes of CO2 saved through funding of customers' energy efficiency projects
- ✓ Windfarm Community Benefit Schemes contributed €660,000 across 78 community groups, benefiting 28,700 people, as well as a wide range of community sponsorships and charitable activities and Energia's Meenadreen Community Benefit Fund was the overall winner that the Wind Industry Awards.

Link to Responsible Business Report FY 2022 [https://www.energiagroup.com/globalassets/document-library/fy22/energia\\_group\\_responsible\\_business\\_report\\_21-22.pdf](https://www.energiagroup.com/globalassets/document-library/fy22/energia_group_responsible_business_report_21-22.pdf)

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### Publication

Other, please specify (Website and social media channels )

### Status

Complete

### Attach the document

### Page/Section reference

[www.energiagroup.com](http://www.energiagroup.com)

Twitter @EnergiaGroup

LinkedIn EnergiaGroup

### Content elements

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### Comment

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## C15. Biodiversity

### C15.1

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	No, but we plan to have both within the next two years	<Not Applicable>	<Not Applicable>

### C15.2

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	No, but we plan to do so within the next 2 years	<Not Applicable>	<Not Applicable>

### C15.3

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, but we plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

### C15.4

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity-related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Land/water protection Land/water management Species management Education & awareness Law & policy

### C15.5

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No	Please select

### C15.6

**(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
No publications	<Not Applicable>	<Not Applicable>

## C16. Signoff

### C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

## C16.1

(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	ESG & Corporate Communications Manager	Other, please specify (Corporate Affairs)

## SC. Supply chain module

### SC0.0

(SC0.0) If you would like to do so, please provide a separate introduction to this module.

### SC0.1

(SC0.1) What is your company's annual revenue for the stated reporting period?

	Annual Revenue
Row 1	3221700000

### SC1.1

(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

**Requesting member**

Bristol-Myers Squibb

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

<Not Applicable>

**Emissions in metric tonnes of CO2e**

0

**Uncertainty (±%)**

0

**Major sources of emissions**

n/a BMS is availing of a green tariff

**Verified**

Yes

**Allocation method**

Allocation based on the energy content of products purchased

**Market value or quantity of goods/services supplied to the requesting member**

24194.785

**Unit for market value or quantity of goods/services supplied**

Megawatt hours (MWh)

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

### SC1.2

(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).

Please see link to our Annual report FY 2022 [annual-report-fy22.pdf \(energiagroup.com\)](#)

### SC1.3

(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Allocation challenges	Please explain what would help you overcome these challenges
We face no challenges	We supply 100% renewable electricity to our customer so we generally don't need to allocate emissions to different customers.

### SC1.4

(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

No

### SC1.4b

(SC1.4b) Explain why you do not plan to develop capabilities to allocate emissions to your customers.

Energia is proud to have supplied 100% renewable electricity in Ireland for the longest period of time. These figures can be reviewed in the [CRU's Fuel Mix Reports for 2014 – 2021](#). We're also engaged in a wide range of projects including wind, energy storage and solar energy. Through our strategic initiatives and our investments, we are decisively addressing the challenges of climate change. We're now further expanding these interests by investing in offshore wind farms and solar projects which will add further to our renewable energy portfolio, creating even further sustainability throughout our business and onwards to our customer base.

### SC2.1

(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.

### SC2.2

(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?

No

### SC4.1

(SC4.1) Are you providing product level data for your organization's goods or services?

No, I am not providing data

### Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

### The European Climate Pact Submission

Please indicate your consent for CDP to showcase your disclosed environmental actions on the European Climate Pact website as pledges to the Pact.

Yes, we wish to pledge to the European Climate Pact through our CDP disclosure

Please confirm below

I have read and accept the applicable Terms