



Headquarters,
Johnstown Castle Estate,
County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number:	IE-GHG163-10428-3
Operator:	Bord Gáis Energy Limited 1 Warrington Place Dublin 2
Installation Name:	Whitegate Power Station
Site Name:	Whitegate Power Station
Location:	Fort Davis Road Whitegate Cork Ireland

Introductory Note

This introductory note does not form a part of the Greenhouse Gas Emissions Permit.

This Greenhouse Gas Emissions Permit authorises the holder to undertake named activities resulting in emissions of Carbon Dioxide from the listed emission sources. It also contains requirements that must be met in respect of such emissions, including monitoring and reporting requirements. This Greenhouse Gas Emissions Permit places an obligation on the Operator to surrender allowances to the Agency equal to the annual reportable emissions of carbon dioxide equivalent from the installation in each calendar year, no later than four months after the end of each such year.

Contact with Agency:

If you contact the Agency about this Greenhouse Gas Emissions Permit please quote the following reference: Greenhouse Gas Emissions Permit N^o IE-GHG163-10428.

All correspondence in relation to this permit should be addressed to:

Email: help.ets@epa.ie

By Post: Climate Change Unit, Environmental Protection Agency
P.O. Box 3000, Johnstown Castle Estate,
Co. Wexford

Updating of the permit:

This Greenhouse Gas Emissions Permit may be updated by the Agency, subject to compliance with Condition 2. The current Greenhouse Gas Emissions Permit will normally be available on the Agency's website at www.epa.ie and [ETSWAP](#).

Surrender of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially surrendered, a written application must be made to the on-line ETS portal, and written permission received from, the Agency through [ETSWAP](#).

Transfer of the permit or part of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially transferred to another Operator a joint written application to transfer this Greenhouse Gas Emissions Permit must be made (by both the existing and proposed Operators) to, and written permission received from, the Agency through the on-line ETS portal [ETSWAP](#).

Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. (as of the date of this permit):

IPC/IE Licence Register Number
P0830-02

Status Log

Current Permit

Permit number	Date application received	Date Permit issued	Comment
IE-GHG163-10428-3	05 March 2015	07 July 2015	Addition of the emission sources S10 and S11, mobile welding plant fuelled by acetylene and propane. Change the source stream from Gas Oil to Kerosene for S8 and S9.

Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG163-10428-1	GHG Permit Application	10 June 2013	14 June 2013	
IE-GHG163-10428-2	GHG Variation	16 May 2014	30 May 2014	Transfer of the Greenhouse Gas Emissions Permit from Bord Gáis Éireann to Bord Gáis Energy Limited on the 01 June 2014.

End of Introductory Note

Glossary of Terms

For the purposes of this permit the terms listed in the left hand column shall have the meaning given in the right hand column below:

The Agency	Environmental Protection Agency.
Agreement	Agreement in writing.
Allowance	Permission to emit to the atmosphere one tonne of carbon dioxide equivalent during a specified period issued for the purposes of Directive 2003/87/EC by the Agency or by a designated national competent authority of a Member State of the European Union.
Annual Reportable Emissions	Reportable Emissions of carbon dioxide made in any calendar year commencing from 1 January 2005 or the year of commencement of the activity, whichever is the later.
A & V Regulation	Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Category A Installation	As defined in Article 19.2 (a) of the M&R Regulation.
Category B Installation	As defined in Article 19.2 (b) of the M&R Regulation.
Category C Installation	As defined in Article 19.2 (c) of the M&R Regulation.
The Directive	Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.
Emissions	The release of greenhouse gases into the atmosphere from sources in an installation.
EPA	Environmental Protection Agency.
Fall-Back Methodology	As defined in Article 22 of the M&R Regulation.
GHG	Greenhouse gas.
GHG Permit	Greenhouse gas emissions permit.
Greenhouse Gas	Any of the gases in Schedule 2 of the Regulations.
IPC/IE	Integrated Pollution Control/Industrial Emissions.
Installation	Any stationary technical unit where one or more activities listed in Schedule 1 to the Regulations are carried out. Also any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution. References to an installation include references to part of an installation.

Installation with low emissions	As defined in Article 47 of the M&R Regulation.
Major Source Streams	As defined in Article 19.3 (c) of the M&R Regulation.
M&R Regulation	Commission Regulation (EU) No 601/2012 of 21 June 2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Mis-statement	An omission, misrepresentation or error in the Operators reported data, not considering the uncertainty permissible pursuant to Article 12(1)(a) of Regulation (EU) no 601/2012.
N/A	Not applicable.
Monitoring Plan	The Plan submitted and approved in accordance with Condition 3.1 of this permit and attached at Appendix 1.
Non-conformity	Any act or omission by the Operator, either intentional or unintentional, that is contrary to the greenhouse gas emissions permit and the requirements of the Monitoring Plan.
The National Administrator	The person so designated in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC.
The Operator (for the purposes of this permit)	Bord Gáis Energy Limited
“operator”	Any person who operates or controls an installation or to whom decisive economic power over the functioning of the installation has been delegated.
Person	Any natural or legal person.
Reportable emissions	The total releases to the atmosphere of carbon dioxide (expressed in tonnes of carbon dioxide equivalent) from the emission sources specified in Table 2 and arising from the Schedule 1 activities which are specified in Table 1.
The Regulations	European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 (S.I. No 490 of 2012) and any amendments or revisions thereto.
The Verifier	A legal person or another legal entity carrying out verification activities pursuant to Regulation (EU) No 600/2012 and accredited by a national accreditation body pursuant to Regulation (EC) No 765/2008 and Regulation (EU) No 600/2012 or a natural person otherwise authorised, without prejudice to Article 5(2) of Regulation (EC) No 765/2008, at the time a verification report is issued.
The Registry	The Registry as provided for under Article 19 of Directive 2003/87/EC.

Schedule 1

Schedule 1 to the Regulations.



Reasons for the Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this permit, the Operator is capable of monitoring and reporting emissions in accordance with the requirements of the Regulations.



Activities Permitted

Pursuant to the Regulations the Agency transfers this Greenhouse Gas Emissions Permit, subject to any subsequent revisions, corrections or modifications it deems appropriate, to:

The Operator:

Bord Gáis Energy Limited
1 Warrington Place
Dublin 2

Company Registration Number: 463078

from

The Former Operator:

Bord Gáis Éireann
2nd Floor
No.6 Lapps Quay
Cork

to carry out the following

Categories of activity:

Annex 1 Activity
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

at the following installation(s):

Whitegate Power Station **Installation number:** 129

located at

Fort Davis Road
Whitegate

Cork
Ireland

subject to the five conditions contained herein, with the reasons therefor and associated tables attached thereto.

In accordance with Joint Declaration made to the Agency on 09 April 2014, *Bord Gáis Energy Limited* is deemed to have assumed and accepted all liabilities, requirements and obligations provided for in or arising under the permit, regardless of how and in respect of what period, including the period 2010-2013, prior to the transfer of the permit, that may arise.

Conditions

Condition 1. The Permitted Installation

- 1.1 This permit is being granted in substitution for the previous GHG permit granted to the Operator as listed in the Status Log of this GHG permit.
- 1.2 The Operator is authorised to undertake the activities and/or the directly associated activities specified in Table 1 below resulting in the emission of carbon dioxide:

Table 1 - Activities which are listed in Schedule 1 of the Regulations and other directly associated activities carried out on the site:

Installation No.: 129

Activity Description
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

Directly Associated Activity Description
N/A

- 1.3 Carbon dioxide from Schedule 1 activities shall be emitted to atmosphere only from the emission sources as listed in Table 2 below:

Table 2 Emission Sources and Capacities:

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S1	Gas Turbine	755	MW
S2	Supplementary Burner	88	MW
S3	Emergency Generator	4.4	MW
S4	Auxiliary Boiler	44	MW
S5	Emergency Fire Pumps	0.18	MW
S6	Pressure Reduction Station Boiler 1	1.2	MW
S7	Pressure Reduction Station Boiler 2	1.2	MW

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S8	Space Heating Oil Fired Boiler 1	0.06	MW
S9	Space Heating Oil Fired Boiler 2	0.06	MW
S10	Acetylene for Mobile Welding Plant	0.5	MW
S11	Propane for Mobile Welding Plant	1	MW

- 1.4 The activity shall be controlled, operated and maintained so that emissions of carbon dioxide shall take place only as set out in this GHG Emissions Permit. The permit does not control emissions of gases other than carbon dioxide. All agreed plans, programmes and methodologies required to be carried out under the terms of this permit, become part of this permit.
- 1.5 This GHG Permit is for the purposes of GHG emissions permitting under the European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 and any amendments to the same only and nothing in this permit shall be construed as negating the Operator's statutory obligations or requirements under any other enactments or regulations unless specifically amended by the Regulations.
- 1.6 Any reference in this permit to 'installation' shall mean the installation as described in the Greenhouse Gas Emissions Permit application and any amendments approved by the Agency.

Reason: To describe the installation and clarify the scope of this permit.

Condition 2. Notification

- 2.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a change in:
- 2.1.1 the nature or functioning of the installation;
 - 2.1.2 the capacity of the installation as detailed in this permit;
 - 2.1.3 the fuels used at the installation;
 - 2.1.4 the range of activities to be carried out at the installation
- that may require updating of the GHG permit shall be carried out or commenced without prior notice to and without the prior written agreement of the Agency.
- 2.2 The Operator shall notify the Agency in writing of the cessation of all or part of any activity listed in Table 1 of this permit no later than one month from the date of cessation or by 31 December of the year of cessation, whichever is sooner.
- 2.3 The Operator shall apply for an update of this GHG Permit where there is a change to the Operator name and/or registered address of the Operator, within seven days of the change.

- 2.4 For installations or parts of installations which have not come into operation when the application for this permit was made the Operator shall notify the Agency of the date of commencement of the activity within seven days of commencement.
- 2.5 The Operator shall notify the Agency in writing within three days of becoming aware of any factors which may prevent compliance with the conditions of this permit.
- 2.6 The Operator shall submit to the Agency by 21 January of each year a declaration of operability. The declaration submitted shall be in the format required by the Agency.
- 2.7 All notifications required under Condition 2 above shall be made to the address given in the Explanatory Note included with this permit.

Reason: *To provide for the notification of updated information on the activity.*

Condition 3. Monitoring and Reporting

- 3.1 The Operator shall monitor and record greenhouse gas emissions on site in accordance with the M&R Regulation and the approved Monitoring Plan attached at Appendix 1 to this GHG permit and in compliance with any other guidance approved by the Agency for the purposes of implementing the Directive and/or the Regulations.
- 3.2 The Operator shall modify the monitoring plan in any of the following situations:
 - 3.2.1 new emissions occur due to new activities carried out or due to the use of new fuels or materials not yet contained in the monitoring plan;
 - 3.2.2 the change of availability of data, due to the use of new measurement instrument types, sampling methods or analysis methods, or for other reasons, leads to higher accuracy in the determination of emissions;
 - 3.2.3 data resulting from the previously applied monitoring methodology has been found incorrect;
 - 3.2.4 changing the monitoring plan improves the accuracy of the reported data, unless this is technically not feasible or incurs unreasonable costs;
 - 3.2.5 the monitoring plan is not in conformity with the requirements of the M&R Regulation and the Agency requests a change;
 - 3.2.6 it is necessary to respond to the suggestions for improvement of the monitoring plan contained in the verification report.

The Operator shall notify any proposals for modification of the monitoring plan to the Agency without undue delay. Any significant modifications of the monitoring plan, as defined in Article 15 of the M&R Regulation, shall be subject to approval by the Agency. Where approved these changes shall be implemented within a timeframe agreed by the Agency.

- 3.3 Temporary changes to the monitoring methodology:
 - 3.3.1 Where it is for technical reasons temporarily not feasible to apply the tier in the monitoring plan for the activity data or each calculation factor of a fuel or material stream as approved by the Agency, the Operator shall apply the highest achievable tier until the conditions for application of the tier approved in the monitoring plan have been restored. The Operator shall take all necessary measures to allow the prompt restoration of the tier in the approved monitoring plan. The Operator shall notify the temporary change to the monitoring methodology without undue delay to the Agency specifying:
 - (i) The reasons for the deviation from the tier;

- (ii) in detail, the interim monitoring methodology applied by the Operator to determine the emissions until the conditions for the application of the tier in the monitoring plan have been restored;
 - (iii) the measures the Operator is taking to restore the conditions for the application of the tier in the approved monitoring plan;
 - (iv) the anticipated point in time when application of the approved tier will be resumed.
- 3.3.2 A record of all non-compliances with the approved monitoring plan shall be maintained on-site and shall be available on-site for inspection by authorised persons of the Agency and/or by the Verifier at all reasonable times.
- 3.4 The Operator shall appoint a Verifier to ensure that, before their submission, the reports required by Condition 3.5 below are verified in accordance with the criteria set out in Schedule 5 of the Regulations, the A&V Regulation and any more detailed requirements of the Agency.
- 3.5 The written report of the verified annual reportable emissions and the verification report in respect of each calendar year shall be submitted to the Agency by the Operator no later than 31 March of the following year. The reports shall be in the format required by the Agency and meet the criteria set out in the M&R and A&V Regulations.
- 3.6 The Operator shall enter the verified annual reportable emissions figure for the preceding year into the Registry no later than 31 March of the following year. This figure shall be electronically approved by the Verifier in the registry no later than 31 March of each year.
- 3.7 Where an Operator is applying the Fall-Back methodology, the Operator shall assess and quantify each year the uncertainties of all parameters used for the determination of the annual emissions in accordance with the ISO Guide to the Expression of Uncertainty in Measurement or another equivalent internationally accepted standard and include the verified results in the written report of the verified annual reportable emissions to be submitted to the Agency by 31 March each year.
- 3.8 An Operator shall submit to the Agency for approval a report containing the information detailed in (i) or (ii) below, where appropriate, by the following deadlines:
 - (a) for a category A installation, by 30 June every four years;
 - (b) for a category B installation, by 30 June every two years;
 - (c) for a category C installation, by 30 June every year.
 - (i) Where the Operator does not apply at least the tiers required pursuant to the first subparagraph of Article 26(1) and to Article 41(1) of the M&R Regulation, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply the required tiers. Where evidence is found that measures needed for reaching those tiers have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan and submit proposals for implementing appropriate measures and its timing.
 - (ii) Where the Operator applies a fall-back monitoring methodology, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply at least tier 1 for one or more major or minor source streams. Where evidence is found that measures needed for reaching at least tier 1 for those source streams have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan, submit proposals and a timeframe for implementing appropriate measures.
- 3.9 Where the verification report states outstanding non conformities, misstatements or recommendations for improvements the Operator shall submit a report to the Agency for approval

by 30 June of the year in which the verification report is issued. This requirement does not apply to the Operator of an installation with low emissions where the verification report contains recommendations for improvements only. The report shall describe how and when the Operator has rectified or plans to rectify the non-conformities identified and to implement recommended improvements. Where recommended improvements would not lead to an improvement of the monitoring methodology this must be justified by the Operator. Where the recommended improvements would incur unreasonable costs the Operator shall provide evidence of the unreasonable nature of the costs. The Operator shall implement the improvements specified by the Agency in response to the report submitted in accordance with this Condition in accordance with a timeframe set by the Agency.

- 3.10 The Operator shall make available to the Verifier and to the Agency any information and data relating to emissions of carbon dioxide which are required in order to verify the reports referred to in Condition 3.5 above or as required by the Agency to facilitate it in establishing benchmarks and/or best practice guidance.
- 3.11 Provision shall also be made for the transfer of environmental information, in relation to this permit, to the Agency's computer system, as may be requested by the Agency.
- 3.12 The Operator shall retain all information as specified in the M&R Regulation for a period of at least 10 years after the submission of the relevant annual report. This shall include all annual emissions reports submitted by the Former Operator(s) in respect of the installation.
- 3.13 A record of independent confirmation of capacities listed in this permit shall be available on-site for inspection by authorised persons of the Agency at all reasonable times.
- 3.14 The Operator shall keep records of all modifications of the monitoring plan. The records shall include the information specified in Article 16.3 of the M&R Regulation.
- 3.15 The Operator shall ensure that members of the public can view a copy of this permit and any reports submitted to the Agency in accordance with this permit at all reasonable times. This requirement shall be integrated with the requirements of any public information programme approved by the Agency in relation to any other permit or licence held by the Operator for the site.
- 3.16 Any discrepancies with regard to reports submitted by the Former Operator(s) in respect of this installation become the liability of the Operator.

Reason: *To provide for monitoring and reporting in accordance with the Regulations.*

Condition 4. Allowances

4.1 Surrender of Allowances

- 4.1.1 The Operator shall, by 30 April in each year, surrender to the Agency, or other appropriate body specified by the Agency, allowances equal to the annual reportable emissions in the preceding calendar year.
- 4.1.2 The number of allowances to be surrendered shall be the annual reportable emissions for the preceding calendar year plus such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due, including any liabilities arising from the period before the permit was transferred. This includes allowances to cover the amount of any annual reportable emissions in respect of which allowances were not surrendered in accordance with Condition 4.1.1 in the previous year, and the amount of any reportable emissions which were discovered during

the previous year to have been unreported in reports submitted under Condition 3 in that or in earlier years.

4.1.3 In relation to activities or parts of activities which have ceased to take place and have been notified to the Agency in accordance with Condition 2.2 above, the Operator shall surrender to the Agency allowances equal to the annual reportable emissions from such activities in the preceding calendar year or part thereof, together with such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due as described in Condition 4.1.2 above.

4.1.4 The Operator may, from 2008 onwards, subject to the provisions of the Regulations and the relevant National Allocation Plan for that compliance year, surrender emission reduction units (ERUs) and certified emission reduction units (CERs) in place of allowances.

4.2 The holding, transfer, surrender and cancellation of allowances shall be in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC, any amendment or revision to the same and any guidance issued by the Agency or the National Administrator.

4.3 The Operator shall provide the National Administrator with all the necessary information for the opening of an Operator holding account for the installation described in Condition 1 of this permit within twenty working days of the issue of this permit, unless such an account is already open.

<i>Reason:</i>	<i>To provide for the surrendering, holding, transfer and cancellation of allowances in respect of reported emissions.</i>
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Condition 5. Penalties

- 5.1 Any Operator who fails to comply with Condition 4.1 above shall be subject to the provisions of the Regulations, including, but not limited to the payment of penalties.

Reason: To provide for the payment of excess emissions penalties as required under the Regulations.

Sealed by the seal of the Agency on this the 07 July 2015:

PRESENT when the seal of the Agency was affixed hereto:

Ms. Annette Prendergast
Inspector/ Authorised Person

Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG163-10428

Monitoring Plan

1. Guidelines & Conditions

1. Directive 2003/87/EC as amended by Directive 2009/29/EC (hereinafter "the (revised) EU ETS Directive") requires operators of installations which are included in the European Greenhouse Gas Emission Trading Scheme (the EU ETS) to hold a valid GHG emission permit issued by the relevant Competent Authority and to monitor and report their emissions and have the reports verified by an independent and accredited verifier.

The Directive can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003L0087:20090625:EN:PDF>

2. The Monitoring and Reporting Regulation (Commission Regulation (EU) No 601/2012) (hereinafter the "MRR") defines further requirements for monitoring and reporting.

The MRR can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:181:0030:0104:EN:PDF>

Article 12 of the MRR sets out specific requirements for the content and submission of the monitoring plan and its updates. Article 12 outlines the importance of the Monitoring plan as follows:

The monitoring plan shall consist of a detailed complete and transparent documentation of the monitoring methodology of a specific installation [or aircraft operator] and shall contain at least the elements laid down in Annex I.

Furthermore Article 74(1) states:

Member States may require the operator and aircraft operator to use electronic templates or specific file formats for submission of monitoring plans and changes to the monitoring plan as well as for submission of annual emissions reports tonne-kilometre data reports verification reports and improvement reports. Those templates or file format specifications established by the Member States shall at least contain the information contained in electronic templates or file format specifications published by the Commission

3. All Commission guidance documents on the Monitoring and Reporting Regulation will be published at the link below as they become available:

http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

(a) Information sources:

EU Websites:

EU-Legislation: <http://eur-lex.europa.eu/en/index.htm>

EU ETS general: http://ec.europa.eu/clima/policies/ets/index_en.htm

Monitoring and Reporting in the EU ETS: http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

Environmental Protection Agency Website:

<http://www.epa.ie>

Environmental Protection Agency Contact:

GHGpermit@epa.ie

2. Application Details

The Installation Name, Site Name and the address of the site of the installation are detailed below. The Site Name and address can be updated from the Organisation Details Page on the ETSWAP website. The Installation Name can only be updated by your Competent Authority.

Installation name	Whitegate Power Station
Site name	Whitegate Power Station
Address	Fort Davis Road Whitegate Cork Ireland

Grid reference of site main entrance	E182735, N062480
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Licence held pursuant to the Environmental Protection Agency Act 1992, as amended.	Yes
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IPC/IE Licence Register Number	Licence holder	Competent body
P0830-02	Bord Gáis Energy Ltd	EPA

Has the regulated activity commenced at the Installation? Yes

Date of Regulated Activity commencement	01 January 2010
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This information is only required to identify the first relevant reporting year of an installation. If the installation was in operation from the beginning of 2008 and held a Greenhouse Gas Emissions Permit from this point, 1 January 2008 will be used where the actual date of commencement is not readily known.

3. About the Operator

The information about the "Operator" is listed below. The "Operator" is defined as the person who it is proposed will have control over the relevant Regulated Activities in the installation in respect of which this application is being made.

(b) Operator Details

The name of the operator and where applicable the company registration number are detailed below. These details can only be updated by the Environmental Protection Agency.

Operator name	Bord Gáis Energy Limited
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Company Registration Number	463078
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Operator Legal status

The legal status of the operator is:	Company / Corporate Body
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(c) Company / Corporate Body

Is the trading / business name different to the operator name? No

Details of the individual authorised to submit this application on behalf of the company / corporate body.

Title	Mr
Forename	Declan
Surname	Lynch
Position	Senior Engineer

Registered office address

Address Line 1	1 Warrington Place
Address Line 2	N/A
City/Town	Dublin 2
County	N/A
Postcode	N/A

Principal office address

Is the principal office address different to the registered office address? Yes

Address Line 1	1st Floor
Address Line 2	City Quarter
City/Town	Lapps Quay
County	Cork
Postcode	N/A
Company registration number	N/A

Holding company

Does the company belong to a holding company? No

(d) Operator Authority

Does the operator named above have the authority and ability to:

a. manage site operations through having day-to-day Yes

control of plant operation including the manner and rate of operation

- | | | |
|----|--|-----|
| b. | ensure that permit conditions are effectively complied with | Yes |
| c. | control monitor and report specified emissions | Yes |
| d. | be responsible for trading in Allowances so that at the end of a reporting period allowances can be balanced against reported emissions. | Yes |

4. Service Contact

e. Service Contact

Name	Mr Declan Lynch
Address / Email Address	Bord Gáis Énergy Limited 3rd Floor City Quarter Lapps Quay Cork Ireland

5. Installation Activities

f. Installation Description

Below is a description of the installation and its activities, a brief outline description of the site and the installation and the location of the installation on the site. The description also includes a non-technical summary of the activities carried out at the installation briefly describing each activity performed and the technical units used within each activity.

Bord Gáis Energy Ltd owns the Whitegate Power Station, located in Whitegate, Midleton, Co. Cork. The power station is a single shaft 445 MW combined cycle gas turbine (CCGT) electricity generating station. The day to day operations of the power station have been contracted to General Electric (GE), who have 31 full time staff working on the power station. The power station uses natural gas as the primary fuel and utilises distillate fuel as secondary fuel. The electrical power generated in the power station is exported via the 220kV substation located on the site onto the main national grid, which is operated by EirGrid.

g. Annex 1 Activities

The table below lists the technical details for each Annex 1 activity carried out at the installation.

Note that 'capacity' in this context means:

- Rated thermal input (for combustion installations) which is defined as the rate at which fuel can be burned at the maximum continuous rating of the installation multiplied by the calorific value of the fuel and expressed as megawatts thermal.
- Production capacity for those specified Annex I activities for which production capacity determines ETS eligibility.

Annex 1 Activity	Total Capacity	Capacity units	Specified Emissions
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)	895.6	MW	Carbon Dioxide

h. Site Diagram

The table below lists attachments (if available) that provide a simple diagram showing emissions sources source streams sampling points and metering/measurement equipment.

Attachment	Description
Site Layout IDO-010 Rev F.pdf	Site Layout 1
Site Layout IDO-011 Rev G.pdf	Site Layout 2
WIPP GHG 163-01 Emission Points.pdf	Site Layout 3
GHG 163-01WIPP Emission Points 19-06-15.pdf	Site Map

i. Estimated Annual Emissions

Detail of the estimated annual emission of CO₂ equivalent. This information enables categorisation of the installation in accordance with Article 19 of the MRR and is based on the average verified annual emissions of the previous trading period data OR if this data is not available or is inappropriate a conservative estimate of annual average emissions including transferred CO₂ excluding CO₂ from biomass.

Estimated Annual Emissions (tonnes CO_{2(e)}) 744200

Installation Category: C

6. Emissions Details

j. About your emissions

Annex I of the Monitoring and Reporting Regulations (MRR) requires that monitoring plans include a description of "the installation" and activities to be carried out and monitored including a list of emission sources and source streams. The information provided in this template relates to the Annex I activity(ies) comprised in the installation in question and should relate to a single installation. It includes any activities carried out by the operator and does not include related activities carried out by other operators.

k. Emission Sources

The table below lists all the emission sources at the installation, which may include directly associated activities/excluded activities.

Emission Source Reference	Emission Source Description
S1	Gas Turbine
S2	Supplementary Burner
S3	Emergency Generator
S4	Auxiliary Boiler
S5	Emergency Fire Pumps
S6	Pressure Reduction Station Boiler 1
S8	Space Heating Oil Fired Boiler 1
S7	Pressure Reduction Station Boiler 2
S9	Space Heating Oil Fired Boiler 2
S10	Acetylene for Mobile Welding Plant
S11	Propane for Mobile Welding Plant

The table below lists the emission sources which are linked to the Regulated Activities at the installation.

Emission Source Reference	Emission Source Description
S1	Gas Turbine
S2	Supplementary Burner
S3	Emergency Generator
S4	Auxiliary Boiler
S5	Emergency Fire Pumps
S6	Pressure Reduction Station Boiler 1
S7	Pressure Reduction Station Boiler 2
S8	Space Heating Oil Fired Boiler 1
S9	Space Heating Oil Fired Boiler 2
S10	Acetylene for Mobile Welding Plant
S11	Propane for Mobile Welding Plant

I. Emission Points

The table below lists all the emission points at the installation, which may include directly associated activities/excluded activities.

Emission Point Reference	Emission Point Description
A2-1	Main Stack (gas turbine, supplementary burner)
A3-1	Emergency Generator
A1-1	Auxillary boiler
A5-1	Pressure Reduction Station Boiler
A5-2	Pressure Reduction Station Boiler
A6-1	Space Heating Boiler
A6-2	Space Heating Boiler
A4-1	Fire Pump
A7-1	Acetylene Welding plant
A7-2	Propane Welding Plant

m. Source Streams (fuels and/or materials)

The table below lists the source streams which are used in Schedule 1 Activities at the installation.

Source Stream Reference	Source Stream Type	Source Stream Description
NG1	Combustion: Other gaseous & liquid fuels	Natural Gas
D1	Combustion: Commercial standard fuels	Gas/Diesel Oil
K1	Combustion: Commercial standard fuels	Kerosene (other than jet kerosene)
Acty1	Combustion: Other gaseous & liquid fuels	Acetylene
Prop1	Combustion: Commercial standard fuels	Propane

n. Emissions Summary

The table below provides a summary of the emission source and source stream details in the installation.

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
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Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
NG1	S1,S2,S4,S6,S7	A2-1,A1-1,A5-1,A5-2	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
D1	S1,S3,S4,S5	A2-1,A3-1,A1-1,A4-1	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
K1	S8,S9	A6-1,A6-2	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
Acty1	S10	A7-1	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
Prop1	S11	A7-2	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

o. Excluded Activities

Certain activities that result in greenhouse gas emissions may be excluded under the EU ETS Directive for example truly mobile sources such as vehicle emissions.

Do you have any excluded activities which need to be identified in your monitoring plan? No

7. Low Emissions Eligibility

p. Low Emissions Eligibility

The operator may submit a simplified monitoring plan for an installation where no nitrous oxide activities are carried out and it can be demonstrated that:

(a) the average verified annual emissions of the installation during the previous trading period was less than 25 000 tonnes CO_{2(e)} per year or;

(b) where this data is not available or inappropriate a conservative estimate shows that emissions for the next 5 years will be less than 25 000 tonnes CO_{2(e)} per year.

Note: the above data shall include transferred CO₂ but exclude CO₂ stemming from biomass.

Does the installation satisfy the criteria for installations with low emissions (as defined by Article 47 of the MRR)? No

8. Monitoring Approaches**q. Monitoring Approaches**

Emissions may be determined using either a calculation based methodology ("calculation") or measurement based methodology ("measurement") except where the use of a specific methodology is mandatory according to the provisions of the MRR. [MRR Article 21].

Note: the operator may subject to competent authority approval combine measurement and calculation for different sources. The operator is required to ensure and demonstrate that neither gaps nor double counting of reportable emissions occurs.

Please specify whether or not you propose to apply the following monitoring approaches. Select all monitoring approaches that are applicable to you. The consecutive sections will become mandatory based on the selected approaches.

Calculation	Yes
Measurement	No
Fall-back approach	No
Monitoring of N ₂ O	No
Monitoring of PFC	No
Monitoring of transferred / inherent CO ₂	No

9. Calculation**r. Approach Description**

The calculation approach including formulae used to determine annual CO₂ emissions:

A detailed description of the full method for calculating CO₂ emissions from natural gas is provided in the Additional Information section ('Procedure for Calculating Carbon Dioxide (CO₂) Emissions 28-05-13'). A sample of the CO₂ Emissions Master File is also presented in this section, which shows how the calculation procedure is applied.

The following sections outline the CO₂ emissions from the various fuels to be used on site, the sources of use and the methodology for the calculation of CO₂ emissions from all fuel types.

a. Natural Gas: Calculation of combustion emissions

The natural gas consumption, composition and gross calorific value will be measured and calculated by Bord Gáis Networks (Gas Network Operator) using ultrasonic type flow meters (with a maximum uncertainty of less than +/- 0.5%) and a chromatograph. The net calorific value and emissions factor are determined from composition using ISO 6976.

CO₂ Emissions (Natural Gas) = fuel flow [t or Nm³] * net calorific value [TJ/t or TJ/Nm³] * emission factor [tCO₂/TJ] * oxidation factor (1)

i. Fuel Flow

Natural Gas fuel flow shall be measured at the ultrasonic meters (3798 and 3799) operated by Bord Gáis Networks. The fuel consumption over the reporting period shall be determined by the fuel supplier within a maximum uncertainty of less than +/- 1.5% taking into account the effect of stock changes. This will comply with Tier 4. Natural gas fuel flow shall be standardized to a temperature of 273.15 K and a pressure of 101,325 Pa.

ii. Net Calorific Value

Activity-specific gross calorific value for the natural gas will be determined by the fuel supplier using an on-line chromatograph and comply with Tier 3. The net calorific value is determined by composition using ISO 6976.

iii. Emission Factor

Activity-specific emission factors will be calculated from composition and comply with Tier 3.

iv. Chromatographs

The gross calorific values for natural gas will be determined using online gas chromatographs. The operating systems will comply with EN ISO 9001:2000. Calibration services and suppliers will be accredited to EN ISO 17025:2005. Initial and annual calibration will be carried out by a laboratory accredited to EN ISO 17025:2005 using EN ISO 10723:1995. The emission factor determination will comply with Tier 3 requirements.

b. Distillate

Distillate fuel flow shall be measured over the reporting period via Distillate Stock changes. The calorific value and emission factor of the fuel will be measured by the supplier, as a commercial standard fuel.

CO₂ Emissions (Distillate) = fuel flow [t or Nm³] * net calorific value [TJ/t or TJ/Nm³] * emission factor [tCO₂/TJ] * oxidation factor

i. Fuel Flow

Distillate fuel flow shall be measured by taking the annual opening and closing levels of the 4 distillate tanks and opening and closing readings from the Distillate Meter. The fuel consumption over the reporting period shall be determined within a maximum uncertainty of less than +/- 1.5% taking into account the effect of stock changes. This will comply with Tier 4.

ii. Net Calorific Value

Activity-specific net calorific value for the Distillate will be determined by the fuel supplier as a commercial standard fuel. This will comply with Tier 2a.

iii. Emission Factor

Activity-specific emission factors for the Distillate will be determined by the fuel supplier as a commercially standard fuel. This will comply with Tier 2a.

Fuel Flow Calculations

The following formulae shall be used to calculate the consumption (Fuel Flow) of Distillate:

$$\text{Distillate C} = \text{Distillate P} + (\text{Distillate S} - \text{Distillate E}) - \text{Distillate O}$$

where:

Distillate C: Distillate consumed during the reporting period

Distillate P: Distillate purchased during the reporting period

Distillate S: Distillate stock at the beginning of the reporting period

Distillate E: Distillate stock at the end of the reporting period

Distillate O: Distillate used for other purposes (transportation or re-sold)

The opening and closing stocks would be taken from the following tanks on site:

Tank 1: Untreated Distillate Tank (Total 1512 tonnes)

Tank 2: Treated Distillate Tank (Total 336 tonnes)

Tank 3: Auxiliary Boiler Tank (Total 18.8 tonnes)

Tank 4: Emergency Generator Tank (Total 4.2 tonnes)

The Distillate purchased will be measured at the Distillate Meter located in the adjoining oil refinery. These purchases shall be verified using opening and closing meter readings, and corroborated by the summation of deliveries as indicated on invoices issued for each delivery during the period.

Distillate Meter

The following are the technical details associated with the Distillate Meter located in the adjoining oil refinery:

Meter Name: Distillate Meter 1

Meter Location: Oil Refinery

Meter Type: Coriolis 'Optimas 2000 S1 50'

Meter Serial No.: G090000008802162

Meter Accuracy: 0.054%

Fuel deliveries by road tanker will be verified via invoices issued for each delivery.

Kerosene fuel flow will be measured on an annual basis by recording opening stocks, closing stocks and purchases during the reporting period.

Propane and Acetylene usage will be measured on an annual basis by recording the opening stocks, closing stocks and purchases during the reporting period.

CO₂ Emissions (Propane, Kerosene, Acetylene) = fuel flow [t or Nm³] * net calorific value [TJ/t or TJ/Nm³] * emission factor [tCO₂/TJ] * oxidation factor

s. Measurement Devices

Below is a description of the specification and location of the measurement systems used for each source stream where emissions are determined by calculation

Also a description of all measurement devices including sub-meters and meters used to deduct non-Annex I activities to be used for each source and source stream.

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
NG1	S1,S2,S4,S6,S7	Meter Number 3798	Ultrasonic meter	0 to 4000	cubic metres	0.50	Bord Gais Networks AGI Compound
NG1	S1,S2,S4,S6,S7	Meter Number 3799	Ultrasonic meter	0 to 4000	cubic metres	0.50	Bord Gais Networks AGI Compound
D1	S1,S3,S4,S5	Meter Number G090000008802162	Coriolis meter	0 to 4000	kg	0.05	Adjacent Oil Refinery
D1	S1,S3,S4,S5	Tank Level Gauge 10EGA10CL001	Electronic volume conversion instrument (EVCI)	0 to 15 metres	metres	0.20	Untreated Distillate Oil Storage Tank
D1	S1,S3,S4,S5	Tank Level Gauge No 10EGB10CL001	Electronic volume conversion instrument (EVCI)	0 to 20 metres	metres	0.20	Treated Distillate Oil Storage Tank
D1	S1,S3,S4,S5	Tank Level Gauge No. 10EGB20CL001	Electronic volume conversion instrument (EVCI)	0 to 10 metres	metres	0.10	Auxiliary Boiler Distillate Tank
D1	S1,S3,S4,S5	Local Level Gauge	Level gauge	0 to 2 metres	metres	0.1	Emergency Generator Distillate Tank
K1	S8,S9	Local Tank Gauge	Tank dip	0 to 1 cubic meter	cubic meters	1	Contractors Compound
Acty1	S10	Weight Machine 1	Weighscale	0 to 30	kg	1	Workshop Stores

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
Prop1	S11	Weigh Machine 1	Weighscale	0 to 30	kg	1	Workshop Stores

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
NG1	Meter Number 3798	Continual	Trade partner	Yes	Yes	Yes
NG1	Meter Number 3799	Continual	Trade partner	Yes	Yes	Yes
D1	Meter Number G090000008802162	Batch	Trade partner	Yes	Yes	Yes
D1	Tank Level Gauge 10EGA10CL001	Batch	Operator	N/A	N/A	N/A
D1	Tank Level Gauge No 10EGB10CL001	Batch	Operator	N/A	N/A	N/A
D1	Tank Level Gauge No. 10EGB20CL001	Batch	Operator	N/A	N/A	N/A
D1	Local Level Gauge	Batch	Operator	N/A	N/A	N/A
K1	Local Tank Gauge	Batch	Operator	N/A	Yes	N/A
Acty1	Weight Machine 1	Batch	Operator	N/A	N/A	N/A
Prop1	Weigh Machine 1	Batch	Operator	N/A	N/A	N/A

t. Applied Tiers

The table below identifies the tiers applied against the relevant input data for each source stream and confirms whether a standard (MRR Article 24) or mass balance (MRR Article 25) approach is applied.

(i) The highest tiers as defined in Annex II of the MRR should be used by Category B and C installations to determine the activity data and each calculation factor (except the oxidation factor and conversion factor) for each major source stream. Category A installations should apply as a minimum the tiers listed in Annex V.

(ii) Operators may apply a tier one level lower than those referred to in sub paragraph (i) above for Category C installations and up to two levels lower for Category A and B installations with a minimum of tier 1 if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier. The justification for not applying the higher tier should be recorded when completing the tier table.

(iii) The competent authority may allow an operator to apply even lower tiers than those referred to in the sub paragraph (ii) with a minimum of tier 1 for a transition period of up to three years if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier and provides an improvement plan detailing how and by when at least the tier referred to in sub paragraph (ii) will be achieved. The improvement plan should be referenced in subsequent table and provided to the competent authority at the time of submission of this plan.

(iv) For minor source streams operators shall apply the highest tier which is technically feasible and will not lead to unreasonable costs with a minimum of tier 1 for activity data and each calculation factor. For de-minimis source streams operators may use conservative estimations rather than tiers unless a defined tier can be achieved without additional effort (MRR Article 26(2)).

(v) Installations with low emissions as identified in section 6(d) may apply as a minimum tier 1 for determining activity data and calculation factors for all source streams unless higher accuracy is achievable without additional effort.

* Note 1: For commercial standard fuels the minimum tiers listed in Annex V of the MRR may be applied for all activities in all installations.

* Note 2: If you are intending to apply a fall-back approach please complete the table below and select "n/a" for the tiers to be applied for each source stream where a fall-back approach is used. Section 10 "Fall-back" must also be completed for these source streams.

* Note 3: For biomass or mixed fuels the emission factor is the preliminary emission factor as defined in Definition 35 Article 3 of the MRR.

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
NG1	S1,S2,S4,S6,S7	Meter Number	<1.5%	Standard	4	3	3	N/A	1	N/A	N/A	869500	99.94	Major	Yes	n/a	n/a

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
		3798, Meter Number 3799															
D1	S1,S3,S4,S5	Meter Number G0900 00008 80216 2,Tank Level Gauge 10EGA 10CL00 1,Tank Level Gauge No 10EGB 10CL00 1,Tank Level Gauge No. 10EGB 20CL00	<1.5%	Standard	4	2a	2a	N/A	1	N/A	N/A	500	0.06	Minor	Yes	n/a	n/a

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
		1, Local Level Gauge															
K1	S8,S9	Local Tank Gauge	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	12.8	0	De-minimis	N/A	n/a	n/a
Acty1	S10	Weight Machine 1	N/A	Standard	No tier	1	1	N/A	1	N/A	N/A	0.35	0	De-minimis	N/A	n/a	n/a
Prop1	S11	Weight Machine 1	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	0.35	0	De-minimis	N/A	n/a	n/a

Total Estimated Emissions for Calculation (tonnes CO_{2(e)})

870013.5

u. Uncertainty Calculations

The table below lists evidence attached to the application that demonstrates compliance with the applied tiers in accordance with Article 12 of the MRR.

Attachment	Description
ETS Uncertainty Calculations 7-3-13.pdf	Uncertainty Calculations
GHG Uncertainty Justification 7-3-13.pdf	Uncertainty Justification
ETS Uncertainty Calculations 5-4-13.pdf	Uncertainty Calculations updated April 2013
ETS Uncertainty Calculations 19-6-15.pdf	ETS Uncertainty Calculations Update 1 2015

v. Applied tiers

Applied tiers for each source stream

Source Stream Ref.	Emission Source Refs.	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied
NG1	S1,S2,S4,S6,S7	4	3	3	N/A	1	N/A	N/A
D1	S1,S3,S4,S5	4	2a	2a	N/A	1	N/A	N/A
K1	S8,S9	No tier	2a	2a	N/A	1	N/A	N/A
Acty1	S10	No tier	1	1	N/A	1	N/A	N/A
Prop1	S11	No tier	2a	2a	N/A	1	N/A	N/A

w. Justification for Applied tiers

Justifications for the applied tiers for each major source stream where highest tiers are not currently achieved.

Source Stream Ref.	Emission Source Refs.	Justification for the applied tier	Improvement Plan Reference (where applicable)
N/A	N/A	N/A	N/A

10. Calculation Factors

x. Default Values

The table below lists, for each parameter, where default values are to be used for calculation factors.

Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
D1	S1,S3,S4,S5	NCV, EF, Oxidation Factor	Ireland's National Greenhouse Gas Inventory	n/a
K1,Prop1	S11,S8,S9	NCV, EF, Oxidation Factor	Ireland's National Greenhouse Gas Inventory	n/a
Acty1	S10	NCV, EF, Oxidation Factor	Ireland Tier 1 country specific factors	n/a

Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO₂ emissions? Yes

y. Analysis

The table below lists, for each source stream, where calculation factors are to be determined by analysis.

Source Stream Refs.	Emission Source Refs.	Parameter	Method of Analysis	Frequency	Laboratory Name	Laboratory ISO17025 Accredited	Evidence Reference
NG1	S1,S2,S4,S6,S7	Carbon Content	Chromatograph	Continuous	EffecTech	Yes	n/a
NG1	S1,S2,S4,S6,S7	NCV, Density, Relative Density, Wobbe-index	Gas Chromatograph	Continuous	EffecTech	Yes	n/a

Detail about the written procedures for the above analysis.

Where a number of procedures are used details of an overarching procedure which covers the quality assurance of analyses methods and links together individual analytical methods is listed.

Title of procedure	Glanagow AGI Fuel Gas Quality Measurement System
Reference for procedure	12/007/02
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The natural gas composition and gross calorific value will be measured and calculated by Bord Gáis Networks (Gas Network Operator) using a chromatograph. The net calorific value and emissions factor are determined from composition using ISO 6976.

In accordance with accepted fiscal metering requirements and those of the EU-ETS measurement and reporting guidelines, the annual Glanagow audit report details the calibration of the instrument based on the international standard ISO 10723 and by an ISO 17025 accredited laboratory. The following performance benchmarks were determined; Errors in the measured amount of each component and physical properties uncorrected by the measurement system. The mean error represents the overall bias for each measurand over the measurement range specified. These values can be compared to the maximum permissible bias (MPB) allowed for this instrument. Note: Instrumental errors arise from uncorrected non-linearity in the relationship between component amount and instrument response. Uncertainties on measured normalised amount of each component and physical properties expressed as a minimum, mean and maximum. Such uncertainties are those on unbiased measurements and are equivalent to the uncertainty on the errors determined above. Note: Uncertainties in these parameters arise from a combination of the uncertainties in the calibration gas composition and the precision (repeatability) of the instrument. Overall bias (mean error) in the measurement of composition and physical properties each with an associated expanded combined uncertainty. These values and their uncertainties can be compared to the maximum permissible error (MPE) allowed for this instrument.

The following relevant standards are followed for Natural gas:

ISO 10723:2012 (Natural Gas Performance Evaluation for Analytical Systems)

ISO 6976: 2005 (Natural Gas calculation of Calculation of calorific value, density and Wobbe index from composition)

ISO/IEC 17025 - General Requirements for the competence of testing and calibration laboratories

ISO 6143 Gas analysis - determination of composition and

	checking of calibration gas mixtures - comparison methods
	ISO 10715 Natural gas - sampling guidelines
	ISO 6141 Gas analysis - requirements on certificates for gases and gas mixtures
	ISO 15796 Gas Analysis – Investigation and treatment of analytical bias
Post or department responsible for the procedure and for any data generated	Bord Gais Networks
Location where records are kept	Bord Gais Energy Server, Lapps Quay, Cork
Name of IT system used	N/A
List of EN or other standards applied	ISO 10723, ISO 17025, ISO 6976, ISO 6143, ISO 10715, ISO 6141, ISO 15796, OIML R 140

z. Sampling Plan

Details about the procedure covering the sampling plan for the analysis table above.

The procedure below covers the elements of a sampling plan as required by Article 33 of the MRR. Where a number of procedures are used, details of an overarching procedure which covers the sampling methods and links together individual sampling methods are listed.

Attachment	Description
GHG Sampling Procedure Note 11-4-13.pdf	Sampling Plan Note
Annual Glanagow AGI Audit Report 2012.pdf	Annual Glanagow AGI Audit Report
Effectech 0590 ISO 17025 Accreditation.pdf	ISO 17025 Certificate

Title of procedure	GHG Sampling Procedure Note
Reference for procedure	11-4-13
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	This document deals with the current request for a sampling plan associated with the delivery of natural gas to the site and the gas chromatograph operated by the fuel supplier, Bord Gais Networks. The performance evaluation of the on-line chromatograph includes an assessment of sampling methodology.
Post or department responsible for the procedure and for any data generated	Bord Gais Energy
Location where records are kept	Lapps Quay, Cork.
Name of IT system used	N/A
List of EN or other standards applied	N/A

aa. Sampling Plan Appropriateness

The procedure to be used to revise the appropriateness of the sampling plan.

Title of procedure	Annual Glanagow AGI Audit Report
Reference for procedure	60800353
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The audit report covers the Glanagow AGI that serves the Whitegate Power Station and audits the Gas Quality Measurement System.
Post or department responsible for the procedure and for any data generated	Bord Gais Networks
Location where records are kept	Bord Gais Networks, Gasworks Road, Cork.
Name of IT system used	N/A
List of EN or other standards applied	N/A

Are stock estimates carried out as part of the emission calculations? Yes

bb. Year-end reconciliations

The procedure to be used to estimate stocks at the beginning/end of a reporting period where applicable. This should include any source streams monitored using batch metering e.g. where invoices are used.

Title of procedure	GHG Distillate Stock Reconciliation
Reference for procedure	11-04-13
Diagram reference	N/A
Brief description of procedure.	The document "GHG Distillate Stock Reconciliation - 11-4-13" covers the procedures in use for the recording of distillate stock levels on the Whitegate Power Station site. It covers the recording and transmission of distillate tank levels on site and verification of same.
Post or department responsible for the procedure and for any data generated	Bord Gais Energy
Location where records are kept	Lapps Quay and Whitegate Power Station
Name of IT system used	N/A
List of EN or other standards applied	N/A

cc. Tracking Instruments

The procedure used to keep track of instruments installed in the installation used for determining activity data.

Title of procedure	GHG Instrument Tracking Document
Reference for procedure	12-04-13
Diagram reference	N/A
Brief description of procedure.	The document "GHG Instrument Tracking Document" provides a tracking list of the main instruments used for determining fuel delivered, consumed, stored or transferred into or from the Whitegate Power Station.
Post or department responsible for the procedure and for any data generated	Bord Gais Energy
Location where records are kept	Lapps Quay and Whitegate Power Station
Name of IT system used	N/A

List of EN or other standards applied

N/A

11. Management

dd. Monitoring and Reporting Responsibilities

Responsibilities for monitoring and reporting emissions from the installation are listed below:

Relevant job titles/posts and provide a succinct summary of their role relevant to monitoring and reporting are listed below.

Job Title / Post	Responsibilities
Senior Engineer	Manage the Emissions Trading Scheme (ETS) and Green House Gas (GHG) process for Bord Gais and the Whitegate Power Station and act as the key contact for the EPA on all ETS and GHG issues.
EHS Lead	At site level, provide support for all ETS and GHG activities

Attachment	Description
N/A	N/A

ee. Assignment of Responsibilities

Details of the procedure used for managing the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR:

This procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 1 - Roles and Responsibilities
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	<p>The document titled "Green House Gas (GHG) Permit - Management Procedures" has been developed to ensure that all requirements laid out in the GHG Permit issued to the power station are met in full and also includes Monitoring and Reporting requirements. Section 1 - Roles and Responsibilities deals with procedures that cover areas such as assigned roles and responsibilities for the overall management of the GHG permit, Monitoring and Reporting, execution of pre-defined GHG tasks, collation of data, updating and submission of records and forms, quality control and assurance procedures, storage and retrieval of data/information, contact details, etc. Monitoring and reporting responsibilities are assigned based on several factors that would include, but not be limited to, a person's position within the organisation and department, general levels of training and experience on the operations of the business unit and training and experience with the GHG process. The training requirements for personnel assigned roles and responsibilities are reviewed on an annual basis and training maintained or upgraded accordingly.</p> <p>The data flow activities for natural gas begin with the fuel supplier, Bord Gas Networks, who collect and check the data obtained from the gas chromatograph and meters. This data is then passed on to the Assets Operations department of Bord Gais Energy in electronic file format, transfers via email, where the nominated person assigned responsibilities for data flow activities re-checks the data prior to and during upload to the main CO₂ emissions register. The final year end CO₂ emissions register is reviewed by at least one person who has not been involved in the determination and recording of that information or data. The final year end CO₂ emissions register is then sent to the Verifier for cross checking and final sign off prior to</p>

submission to the Agency.

Post or department responsible for the procedure and for any data generated	Assets Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

ff. Monitoring Plan Appropriateness

Details of the procedure used for regular evaluation of the monitoring plan's appropriateness covering in particular any potential measures for the improvement of the monitoring methodology:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 2 - Evaluation
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 2 - Evaluation deals with the procedures for ensuring regular reviews of emissions sources and source streams are carried out to ensure completeness of the emissions and source streams and that all relevant changes in the nature and functioning of the installation are included in the monitoring plan. The procedure also ensures that a regular assessment is carried out for the uncertainty thresholds for activity data and the applied tiers for each source stream and emission source. The procedure also includes a section whereby continuous improvement is sought in relation to the monitoring methodology applied.

Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

gg. Data Flow Activities

Details of the procedures used to manage data flow activities in accordance with Article 57 of the MRR:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 3 - Data Flow Activity
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 3 - Data Flow Activity deals with the procedures for identifying primary data sources, mapping the sequencing and interaction between data flow activities, setting out the

	process steps for data flow activities, as well as setting out the data processing and storage systems to be used for the management of all data flow activities.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A
List of primary data sources	Gas Usage (invoices) and Chromatograph data from Bord Gais Networks
	Distillate transfers (invoices) from the adjacent refinery
	Distillate deliveries by road tankers (invoices)
	Distillate Stock held (stock takes)
	Kerosene deliveries and stock takes
	Acetylene deliveries and stocktakes
	Propane deliveries and socktakes
Description of the relevant processing steps for each specific data flow activity.	Activity Data: Natural Gas Consumption
Identify each step in the data flow and include the formulas and data used to determine emissions from the primary data. Include details of any relevant electronic data processing and storage systems and other inputs (including manual inputs) and confirm how outputs of data flow activities are recorded	<p>(1) Monthly Activity Data for Gas Consumption.</p> <p>a. Downloaded by Bord Gais Networks from site gas meters and chromatograph.</p> <p>b. Data stored on Bord Gais Networks main server.</p> <p>c. Data sent to Bord Gais Energy via email.</p> <p>d. Data stored on Bord Gais Energy main server.</p> <p>(2) Master Emissions Spreadsheet.</p> <p>a. Monthly Activity Data transferred to master emissions spreadsheet.</p> <p>b. Monthly CO2 emissions automatically calculated based on input data.</p> <p>(3) Monthly Data Validation.</p> <p>a. Monthly rolling totals are crossed checked regularly against estimated CO2 emissions.</p>

b. Estimated CO₂ emissions derived from using actual gas consumed (MWhr) and an estimated emissions factor (tCO₂/MWhr).

(4) In September of each year, updated master spreadsheet sent to Verifier.

(5) At year end, master spreadsheet is validated.

a. Year-end validation includes cross checking calculated CO₂ emissions against estimated CO₂ emissions, where the estimated CO₂ emissions are based on actual gas consumed and an estimated emission factor.

b. Year-end validation also includes cross checking monthly gas consumed against monthly invoiced consumption.

(6) Validated CO₂ emissions spreadsheet sent to the Verifier.

Calculation of CO₂ Emissions from the consumption of Natural Gas =

Yearly CO₂ emissions are derived from the summation of monthly CO₂ emissions.

Monthly CO₂ emissions are derived from the summation of hourly CO₂ emissions.

Hourly CO₂ emissions are calculated by using hourly activity data from the natural gas meters and chromatograph.

Hourly CO₂ Emissions =

Hourly Gas Consumption (KCM) X NCV (MJ/m³) X Emissions Factor (tCO₂/TJ) X 1000

Hourly Emissions Factor (tCO₂/TJ) =

The emissions factor is calculated from data obtained from the chromatograph and utilises the concentrations of CO₂, Methane, Ethane, Propane, N-Butane, ISO Butane, N-Pentane, ISO-Pentane, Hexane and Nitrogen contained in the natural gas to generate an emissions factor.

Activity Data: Distillate Fuel

(1) Year-end readings taken for the 4 distillate tanks:

- a. Tank 1: Untreated Distillate Tank
- b. Tank 2: Treated Distillate Tank
- c. Tank 3: Auxiliary Boiler Tank
- d. Tank 4: Emergency Generator Tank
- (2) Year-end tank level readings entered into site log book.
- (3) Year-end tank level readings emailed to Bord Gais Energy.
- (4) Deliveries of Distillate (Refinery)
 - a. Fixed delivery volume requested from Refinery.
 - b. Opening meter reading taken prior to the commencement of delivery.
 - c. Closing meter reading taken on completion of delivery.
 - d. Verification of volume delivered versus volume requested.
 - e. Delivery of distillate recorded in site log book.
 - f. Delivery records emailed to Bord Gais Energy.
 - g. Delivery records stored on Bord Gais Energy main server.
- (5) Deliveries of Distillate (Road)
 - a. Fixed delivery volume requested from supplier.
 - b. Tank levels checked and recorded prior to commencement of delivery.
 - c. Tank levels checked and recorded on completion of delivery.
 - d. Verification of volume delivered versus volume requested.
 - e. Delivery of distillate recorded in site log book.

- f. Delivery records emailed to Bord Gais Energy.
- g. Delivery records stored on Bord Gais Energy main server.
- (6) Transfers of Distillate (Road)
 - a. Fixed transfer volume agreed with off-taker.
 - b. Tank levels checked and recorded prior to commencement of transfer.
 - c. Tank levels checked and recorded on completion of transfer.
 - d. Verification of volume transferred versus volume agreed for transfer.
 - e. Transfer of distillate recorded in site log book.
- (7) Year-end readings taken for the 4 distillate tanks:
 - a. Tank 1: Untreated Distillate Tank
 - b. Tank 2: Treated Distillate Tank
 - c. Tank 3: Auxiliary Boiler Tank
 - d. Tank 4: Emergency Generator Tank
- (8) Deliveries during the year totalised.
- (9) Transfers off site during the year totalised.

Calculation of CO₂ Emissions from the consumption of Distillate Fuel =

Yearly Distillate Fuel Consumed (fuel flow) =

Distillate C = Distillate P + (Distillate S – Distillate E) – Distillate O

where:

Distillate C: Distillate consumed during the reporting period

Distillate P: Distillate purchased during the reporting period

Distillate S: Distillate stock at the beginning of the reporting

period

Distillate E: Distillate stock at the end of the reporting period

Distillate O: Distillate used for other purposes (transportation or re-sold)

CO2 Emissions (Distillate) =

Fuel flow [t or Nm3] * net calorific value [TJ/t or TJ/Nm3] * emission factor [tCO2/TJ] * oxidation factor

CO2 Emissions (Propane, Kerosene, Acetylene) = fuel flow [t or Nm3] * net calorific value [TJ/t or TJ/Nm3] * emission factor [tCO2/TJ] * oxidation factor

Submit relevant documents to record data flow activities

Attachment	Description
N/A	N/A

hh. Assessing and Controlling Risks

Details of the procedures used to assess inherent risks and control risks in accordance with Article 58 of the MRR:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 4 - Risk Management
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 4 - Risk Management deals with the procedures for ensuring conformity with the monitoring and reporting plan relevant to the site and the MRR in general. The document deals with issues such as assessment of inherent risks and control risks, written procedures for risk mitigation, quality assurance processes, duties and competencies required to manage the systems, audits and evaluation processes, management of change processes, document control systems, etc.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

ii. Quality Assurance of Metering / Measuring Equipment

Details of the procedures used to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 5 - Quality Control and Assurance - Subsection 1
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 5 - Quality Control and Assurance - Sub Section 1 deals with the procedures for ensuring metering equipment is regularly calibrated checked against industry measurement standards, and performs as designed.
Post or department responsible for the procedure and for any data generated	Assets Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

jj. Quality Assurance of Information Technology used for Data Flow Activities

Details of the procedures used to ensure quality assurance of information technology used for data flow activities in accordance with Article 58 and 60 of the MRR:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 5 - Quality Control and Assurance - Subsection 2
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 5 - Quality Control and Assurance - Sub Section 2 deals with the procedures for ensuring that the information technology system is designed, documented, tested, implemented, controlled and maintained in a manner that produces reliable, accurate and timely data. The document also deals with control of systems, back-up, recovery, continuity planning and security.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

kk. Review and Validation of Data

Details of the procedures used to ensure regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR.

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 6 - Audits and Validation
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 6 - Audit and Validation deals with the procedures for ensuring that a regular process is put in place to review and validation all process, including a check on whether data is complete, compares with data over previous years, compares fuel consumption reported with purchase records and factors obtained for fuel suppliers with international reference factors.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

ll. Corrections and Corrective Actions

Details of the procedures used to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 7 - Corrective Actions
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 7 - Corrective Actions deals with the procedures for ensuring appropriate corrective actions are taken in the event of process malfunction or error, correct data whilst avoiding underestimation of emissions, and include for the determination of the cause of the malfunction or error.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

mm. Control of Outsourced Activities

Details of the procedures used to control outsourced processes in accordance with Articles 59 and 64 of the MRR.

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 8 - Outsourcing
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 8 - Outsourcing deals with the procedures for checking the quality of outsources data flow activities, defines appropriate requirements for the outputs of the outsourced processes, and ensures quality procedures existing for checking outsourced outputs and resources.
Post or department responsible for the procedure and for any data generated	Asset operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

nn. Record Keeping and Documentation

Details of the procedures used to manage record keeping and documentation:

Title of procedure	Green House Gas (GHG) - Management Procedures
Reference for procedure	Section 9 - Document Control
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Section 9 - Document Control deals with the procedures for ensuring all relevant data and information is retained and stored appropriately for a period of not less than 10 years, is readily retrievable and can be made available to the competent authority on request.
Post or department responsible for the procedure and for any data generated	Asset Operations
Location where records are kept	Bord Gais Energy, 3rd Floor, City Quarter, Lapps Quay, Cork.
Name of IT system used	Bord Gais Energy in-house IT system
List of EN or other standards applied	N/A

oo. Risk Assessment

The results of a risk assessment that demonstrates that the control activities and procedures are commensurate with the risks identified:

Attachment	Description
GHG Risk Assessment 28-5-13.pdf	GHG Risk Assessment

pp. Environmental Management System

Does your organisation have a documented Environmental Management System? No

12. Changes in Operation**qq. Changes in Operation**

Article 24(1) of Commission Decision 2011/278/EC requires that Member States must ensure that all relevant information about any planned or effective changes to the capacity activity level and operation of an installation is submitted by the operator to the competent authority by 31 December each year. Article 12(3) of the MRR further provides that Member States may require information to be included in the monitoring plan of an installation for the purposes of meeting these requirements.

Details of the procedure used to ensure regular reviews are carried out to identify any planned or effective changes to the capacity activity level and operation of the installation that have an impact on the installation's allocation:

The procedure specified below cover the following:

- planning and carrying out regular checks to determine whether any planned or effective changes to the capacity activity level and operation of an installation are relevant under Commission Decision 2011/278/EC; and
- Procedures to ensure such information is submitted to the competent authority by 31 December of each year.

Title of procedure	Not applicable
Reference for procedure	Not applicable
Diagram reference	N/A
Brief description of procedure. The description should	Not applicable

cover the essential parameters and operations performed
Post or department responsible for the procedure and for any data generated Not applicable
Location where records are kept Not applicable
Name of IT system used N/A

13. Abbreviations

rr. Abbreviations Acronyms or definitions

Abbreviations acronyms or definitions that have been used in this monitoring plan:

Abbreviation	Definition
N/A	N/A

14. Additional Information

Any other information:

Attachment	Description
Cert of Reg - IS EN ISO 9001.2008 - GWR - to 19Nov2014.pdf	EN ISO 9001 Certificate
Procedure for Calculating Carbon Dioxide (CO2) Emissions 28-5-13.pdf	Procedure for Calculating CO2 Emissions
CO2 Emissions Master File Template.xls	CO2 Emissions Master File Template
Procedure for Calculating Carbon Dioxide CO2 Emissions 12-06-13.pdf	Procedure for Calculating CO2 emissions updated 12 June 2013
GHG163 Declaration.pdf	Joint Declaration for Permit Transfer
GHG163 Cert Name Change.pdf	Certificate of Incorporation of Change of Name

15. Confidentiality

ss. Confidentiality Statement

It is the Environmental Protection Agency's policy to make information received by it in the course of its work open to inspection by any person on request. This is in accordance with the provisions of the European Communities (Access to Information on the Environment) Regulations 2007 to 2011.

In the event that you considered that some of the information being submitted of a confidential nature, then the nature of this information and the reasons why it should be considered confidential, with reference to the European Communities (Access to Information on the Environment) Regulations 2007 to 2011 and any amendments must be explicitly requested using the facility below. The Board of the Environmental Protection Agency will consider the requests and if the information can be deemed as confidential and necessary.

Notwithstanding any request for confidentiality, the Environmental Protection Agency explicitly reserves the right to release data to the Commission, including emissions and allocations to the public, on the basis that the data will be used for the purposes foreseen in Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

Please tick this box if you consider that any part of your false
form should be treated as commercially
confidential/sensitive:

END of Appendix I.