



Headquarters,
Johnstown Castle Estate,
County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number: IE-GHG191-10517-2

Operator: BT Communications Ireland Limited
No. 2 Grand Canal Plaza
Upper Grand Canal Street
Dublin 4
D04 V586

Installation Name: BT CIL CW DC1

Site Name: BT CIL CW DC1

Location: Unit 4029 (Block A) & Unit 4027 (Block B), Kingswood Road,
Citywest Business Campus,
Dublin 24
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-GHG191-10517.

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):

Status Log

Current Permit

| Permit number | Date application received | Date Permit issued | Comment |
|-------------------|---------------------------|--------------------|---|
| IE-GHG191-10517-2 | 27 November 2020 | 17 December 2020 | 1. Transfer from Equinix (Ireland) Enterprises Limited to BT Communications Ireland Limited and update of installation and site name to BT CIL CW DC1; 2. Addition of 4 new emission sources S6-S9 and the related emission points EP6-EP9. |

Previous Permits

| Permit number | Change Type | Date application received | Date Permit issued | Comment |
|-------------------|------------------------|---------------------------|--------------------|---------|
| IE-GHG191-10517-1 | GHG Permit Application | 20 December 2018 | 20 February 2019 | |

End of Introductory Note

Glossary of Terms

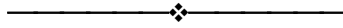
For the purposes of this permit the terms listed in the left hand column shall have the meaning given in the right hand column below:

| | |
|-----------------------------|--|
| 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) | BT Communications Ireland 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:

BT Communications Ireland Limited
No. 2 Grand Canal Plaza
Upper Grand Canal Street
Dublin 4
D04 V586

Company Registration Number: 141524

from

The Former Operator:

Equinix (Ireland) Enterprises Limited
Unit 7 Kilcarbery Park
Nangor Road
Dublin 22

D22FV12

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):

BT CIL CW DC1 **Installation number:** 210704

located at

Unit 4029 (Block A) & Unit 4027 (Block B), Kingswood Road,
Citywest Business Campus,
Dublin 24
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 16 November 2020, *BT Communications Ireland 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 2010-2020, 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.: 210704

| 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 | Standby Generator 1 | <50 | MW |
| S2 | Standby Generator 2 | <50 | MW |
| S3 | Standby Generator 3 | <50 | MW |
| S4 | Standby Generator 4 | <50 | MW |
| S5 | Standby Generator 5 | <50 | MW |
| S6 | Standby Generator 6 | <50 | MW |
| S7 | Standby Generator 7 | <50 | MW |

| Emission Source Reference | Emission Source Description | Capacity | Capacity Units |
|---------------------------|-----------------------------|----------|----------------|
| S8 | Standby Generator 8 | <50 | MW |
| S9 | Standby Generator 9 | <50 | 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.

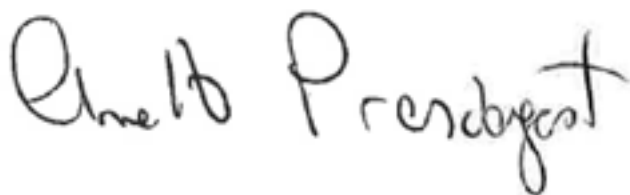
Reason: To provide for the surrendering, holding, transfer and cancellation of allowances in respect of reported emissions.

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.

Signed by the Authorised Person on this the 17 December 2020:



Ms. Annette Prendergast
Inspector/ Authorised Person

Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG191-10517

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 | BT CIL CW DC1 |
| Site name | BT CIL CW DC1 |
| Address | Unit 4029 (Block A) & Unit 4027 (Block B), Kingswood Road, Citywest Business Campus, Dublin 24 Ireland |

| | |
|---|-----------------|
| Grid reference of site main entrance | 305772E 227955N |
|---|-----------------|

| | |
|---|----|
| Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. | No |
|---|----|

Has the regulated activity commenced at the Installation? Yes

| | |
|--|----------------|
| Date of Regulated Activity commencement | 26 August 2010 |
|--|----------------|

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 BT Communications Ireland Limited

Company Registration Number 141524

Operator Legal status

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

(c) Company / Corporate Body

Is the trading / business name different to the operator name? Yes

Trading / business name BT Communications Ireland Limited

Registered office address

Address Line 1 No. 2 Grand Canal Plaza
Address Line 2 Upper Grand Canal Street
City/Town Dublin 4
County N/A
Postcode D04 V586

Principal office address

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

Address Line 1 Unit 4029 (Block A) & Unit 4027 (Block B), Kingswood Road,
Address Line 2 Citywest Business Campus, Dublin 24
City/Town Dublin
County Dublin
Postcode D24 E180 & D24 AX06
Company registration number 141524

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 control of plant operation including the manner and rate of operation Yes
- 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

Address Unit 4029 (Block A) & Unit 4027 (Block B),
Kingswood Road, Citywest Business Campus
Dublin 24
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.

The installation contains two data centres, which provide a secure power supply for a range of companies and businesses, a place to store and reliably run their operations and securely exchange critical information. The data centres are located at Unit 4027 (block B) and at 4029 (block A), Kingswood Road, Citywest Business Campus, Dublin, D24 AX06 and D24 E180, Ireland. The main power supply to maintain the hardware equipment is from the grid supply, however, in order to maintain the necessary level of supply security, there are gas oil-fired generators that run automatically if a power interruption is detected. There are 2 x 35,000 L bulk fuel tanks and these feed 2 x 690 L day tanks + 3 x 438 L day tanks in Unit 4027 (block B), as well as 1 x 90,000 L bulk fuel tank and these feed 4 No 1000 L day tanks in Unit 4029 (Block A).

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) | <50 | 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 |
|--|--|
| BT Unit 4027 and Unit 4029 Stanby Generators GHG Application.pdf | BT Unit 4027 and Unit 4029 GHG Permit Layout |

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)}) 50

Justification for the use of a conservative estimate of CO₂ emissions. A conservative estimate of CO₂ emissions has been used based on highest annual value in this trading period to date.

Installation Category: A

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 | Standby Generator 1 |
| S2 | Standby Generator 2 |
| S3 | Standby Generator 3 |
| S4 | Standby Generator 4 |
| S5 | Standby Generator 5 |
| S6 | Standby Generator 6 |
| S7 | Standby Generator 7 |
| S8 | Standby Generator 8 |
| S9 | Standby Generator 9 |

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

| Emission Source Reference | Emission Source Description |
|----------------------------------|------------------------------------|
| S1 | Standby Generator 1 |
| S2 | Standby Generator 2 |
| S3 | Standby Generator 3 |
| S4 | Standby Generator 4 |
| S5 | Standby Generator 5 |
| S6 | Standby Generator 6 |
| S7 | Standby Generator 7 |
| S8 | Standby Generator 8 |
| S9 | Standby Generator 9 |

l. 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 |
|--------------------------|-----------------------------|
| EP1 | Standby Generator 1 Exhaust |
| EP2 | Standby Generator 2 Exhaust |
| EP3 | Standby Generator 3 Exhaust |
| EP4 | Standby Generator 4 Exhaust |
| EP5 | Standby Generator 5 Exhaust |
| EP 6 | Standby Generator 6 Exhaust |
| EP7 | Standby Generator 7 Exhaust |
| EP8 | Standby Generator 8 Exhaust |
| EP9 | Standby Generator 9 Exhaust |

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 |
|-------------------------|---------------------------------------|---------------------------|
| F1 | Combustion: Commercial standard fuels | Gas/Diesel Oil |

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 |
|------------------------------------|----------------------------|--------------------------------------|--|
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | EP1,EP2,EP3,EP4,EP5,EP 6,EP7,EP8,EP9 | 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)? Yes

If the installation is an installation with low emissions as defined above there are a number of special provisions which may be applied to provide a simplified monitoring plan. These provisions are set out in Article 47 of the MRR.

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:

F1 - Gas/Diesel Oil

Gas Oil Usage: The calculation methodology uses the stock levels in the bulk tanks which have their levels recorded using a dipstick. There are 2 x 35,000 and 1 x 90,000 L bulk tanks and the levels of these are recorded throughout the year to give opening and closing reads. The dipstick reads are carried out by a Datacentre Engineering Manager and stored electronically on site. Consumption can then be determined based on invoiced deliveries and the difference in stock levels throughout the year. This gives the usage of gas oil in litres. Usage in litres is then converted into tonnes of CO₂ using the following formulae:

$$\text{Fuel consumed (t)} = \text{Usage (L)} / \text{Density (L/t)}$$

The activity data is then determined by the following:

$$\text{AD (TJ)} = \text{Fuel Consumed (t)} \times \text{NCV (TJ/t)}$$

The emissions are then calculated using:

$$\text{CO}_2 \text{ Emissions} = \text{Activity Data (TJ)} \times \text{Emissions Factor (tCO}_2\text{/TJ)} \times \text{Oxidation Factor (dimensionless)}$$

The Net Calorific Value (NCV) and Emissions Factor are both taken from the Latest National Greenhouse Gas Inventory (Ireland) as reported to UNFCCC. The Oxidation Factor is taken from MRR Annex II Section 2.3. The density is taken from the latest figures provided by the Sustainable Energy Authority of Ireland.

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 |
|---------------------|----------------------------|-------------------------|----------------------------|-------------------|----------------------|-------------------------------|------------|
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | TD1 | Tank dip | 0-90,000 | Litres | 0.3 | Bulk Tanks |
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | MD1 | Invoiced deliveries | Variable | Litres | 2 | DUB1 |

| 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 |
|---------------------|-------------------------|----------------------|-----------------------------|---------------------------------------|---|--|
| F1 | TD1 | Batch | Operator | N/A | N/A | N/A |
| F1 | MD1 | Batch | Trade partner | Yes | Yes | Yes |

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) |
|---------------------|-----------------------|--------------------------|--|-----------------------------|----------------------------|----------------------------------|------------------------------|-----------------------------|-------------------------------|--------------------------------|-------------------------------|---|--------------------------------|-----------------|-----------------------|--|---|
| F1 | S1,S2,S3,S4,S5,S6,S7, | TD1,MD1 | <5.0% | Standard | 2 | 2a | 2a | N/A | 1 | N/A | N/A | 50 | 100 | De-minimis | 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) |
|---------------------|-----------------------|--------------------------|--|-----------------------------|----------------------------|----------------------------------|------------------------------|-----------------------------|-------------------------------|--------------------------------|-------------------------------|---|--------------------------------|-----------------|-----------------------|--|---|
| | S8,S9 | | | | | | | | | | | | | | | | |

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

50

u. 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 |
|--------------------|----------------------------|----------------------------|----------------------------------|------------------------------|-----------------------------|-------------------------------|--------------------------------|-------------------------------|
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | 2 | 2a | 2a | N/A | 1 | N/A | N/A |

v. 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

w. 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) |
|---------------------|----------------------------|-----------|--|---|
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | NCV | Latest National Greenhouse Gas Inventory (Ireland) as reported to UNFCCC | n/a |
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | EF | Latest National Greenhouse Gas Inventory (Ireland) as reported to UNFCCC | n/a |
| F1 | S1,S2,S3,S4,S5,S6,S7,S8,S9 | OxF | MRR Annex II Section 2.3 | 1 |

Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO₂ emissions? No

11. Management

x. 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 |
|------------------------|--|
| Managing Director | Overall responsibility for monitoring and reporting CO2 emissions for EU ETS BTCILCWDC1 |
| Energy & Power Manager | Day to day responsibility for monitoring for EU ETS BTCILCWDC1 |
| EHS Manager | Providing guidance, coordinating verification and supporting BTCIL management to ensuring compliance is maintained |

| Attachment | Description |
|---|---|
| Organisational Chart - BTCIL CW DC1.pdf | Organisational Chart - BTCIL CW DC1 - Final.pdf |

y. 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.

| | |
|---|--|
| <p>Title of procedure</p> <p>Reference for procedure</p> <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p> | <p>Assignment of Responsibilities</p> <p>BTCILCWDC1 - 1</p> <p>N/A</p> <p>Responsibilities for GHG emissions and ensuring adherence to the permit is assigned to the Managing Director. This person is responsible for ensuring all the relevant personnel are trained and are aware of their assigned responsibilities in accordance with Article 58(3)(c) of the Monitoring and Reporting Regulations. Reviews of training needs in relation to the requirements of the Greenhouse Gas permit will be carried out periodically. Implementation of GHG activities at the site is overseen by the EHS Manager.</p> <p>Energy & Power Manager is responsible for the collection of source data, validation of data and ensuring that this data is used accurately to calculate emissions. Compliance aspects are also reviewed by the EHS Manager. In accordance with Article 61 this procedure details how all relevant information and data shall be confirmed by at least one on-site person who has not been involved in the determination and recording of that information.</p> |
| <p>Post or department responsible for the procedure and for any data generated</p> <p>Location where records are kept</p> <p>Name of IT system used</p> <p>List of EN or other standards applied</p> | <p>Energy & Power Manager</p> <p>BTCILCWDC1 data centre</p> <p>N/A</p> <p>N/A</p> |

z. 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:

| | |
|--|---|
| <p>Title of procedure</p> <p>Reference for procedure</p> | <p>Monitoring Plan Appropriateness</p> <p>BTCILCWDC1 -2</p> |
|--|---|

| | |
|--|--|
| <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p> | <p>N/A</p> <p>This procedure ensures a regular evaluation of the monitoring plan's appropriateness is undertaken, covering, in particular, any potential measures for the improvement of the monitoring methodology. This includes;</p> <p>(i) checking the list of emissions sources and source streams in the plan remains accurate;</p> <p>(ii) updating the plan to reflect any relevant changes in the nature, and functioning of the installation;</p> <p>(iii) assessing compliance with the uncertainty thresholds for activity data and other parameters (where applicable) for the applied tiers for each source stream and emission source; and</p> <p>(iv) assessment of potential measures for improvement of the monitoring methodology applied.</p> <p>Specific duties including but not limited to: regular checks that the plan is reflective of emissions and sources at the installation, regular checks of fuel quality and instrument calibrations, methods of identifying measurement technologies and data sources, selection and application of the processes and tools used for collecting and reporting of GHG emissions and annual checks of any potential improvements that could be made regarding monitoring techniques.</p> |
| <p>Post or department responsible for the procedure and for any data generated</p> <p>Location where records are kept</p> <p>Name of IT system used</p> <p>List of EN or other standards applied</p> | <p>Energy & Power Manager</p> <p>BTCILCWDC1data centre</p> <p>N/A</p> <p>N/A</p> |

aa. Data Flow Activities

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

| | |
|---|---|
| <p>Title of procedure</p> <p>Reference for procedure</p> <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p> | <p>Data Flow Activities</p> <p>BTCILCWDC1 - 3</p> <p>N/A</p> <p>The Monitoring plan covers the main steps in the data flow of activities and how they are managed in accordance with Article 57 of the Monitoring and Reporting Regulation.</p> <p>It will be updated in line with any changes to the</p> |
|---|---|

Monitoring approach description. More specifically this document will identify primary data sources, each step in the flow from primary data to annual emissions. The relevant processing steps of each data flow and the formulas and data used to determine emissions, relevant systems used to record and manipulate data and it will identify how outputs are recorded and logged.

Post or department responsible for the procedure and for any data generated Energy & Power Manager
 Location where records are kept BTCILCWDC1 data centre
 Name of IT system used N/A
 List of EN or other standards applied N/A
 List of primary data sources Gas oil level reads.

Description of the relevant processing steps for each specific data flow activity.

Gas oil delivery invoices.
 Tank levels are recorded throughout the year to give opening and closing reads. These reads are recorded manually and are input and stored as electronic data.
 Records of gas oil deliveries are also kept and the fiscal grade delivery truck metering along with tank meter reads throughout the year are using to determine the Activity Data. The manual reads of the tanks are managed by the BTCILCWDC1 Energy & Power Manager. The Energy & Power Manager ensure that gas oil delivery information is stored for annual reporting purposes. The Diesel / Gas oil consumption is calculated through delivery invoices and stock level differences to give the Activity Data.

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

Emissions are then calculated as below: $CO_2 \text{ Emissions} = \text{Activity Data (TJ)} \times \text{Emissions Factor (tCO}_2\text{/TJ)} \times \text{Oxidation Factor (dimensionless)}$.

Data for NCV and EF are taken from the latest National tables submitted to the UNFCCC.

Submit relevant documents to record data flow activities

| Attachment | Description |
|------------|-------------|
| N/A | N/A |

bb. 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 | Assessing and Controlling Risks |
| Reference for procedure | BTCILCWDC1 - 4 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The above data flow activities document contains a procedure for assessing and controlling risk and a simple risk assessment. The risks associated with the data flow were assessed and appropriate control activities were set up for mitigating the identified risks. The risk is related to any errors, misrepresentations and omissions which might occur in the monitoring data. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

cc. 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 | Quality Assurance of Metering / Measuring Equipment |
| Reference for procedure | BTCILCWDC1 - 5 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The Data Flow activities document contains a procedure for assuring the quality of metering devices. The Energy & Power Manager will ensure that monitoring is adhered to and that all relevant measurement equipment are identified, documented, calibrated and checked at regular intervals. The fuel delivery trucks are fitted with flow meters which are subject to national legal metrology standards. Calibration records are obtained for the gas oil/diesel delivery flow meters, reviewed and held on-site. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

dd. 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 | Quality Assurance of Information Technology used for Data Flow Activities |
| Reference for procedure | BTCILCWDC1 - 6 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The Data Flow activities document contains a procedure for assuring the quality of any IT systems used and identifies how the information technology is tested and under management control. The procedure specifies how information technology is used for data flow and monitoring and how access is controlled through individual unique passwords and permissions. All data is backed up on company servers.. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

ee. 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 | Review and Validation of Data |
| Reference for procedure | BTCILCWDC1 - 7 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The Quality assurance document contains a procedure for reviewing and validating data including a check on whether data is complete, comparisons with data over previous years, comparison of fuel consumption reported, with purchase records and criteria for rejecting data. It includes a cross-check between fuel delivery invoices and actual consumption rates of combustion units and gas oil stock levels. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

ff. 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:

| | |
|---|--|
| <p>Title of procedure</p> <p>Reference for procedure</p> <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p> | <p>Corrections and Corrective Actions</p> <p>BTCILCWDC1 - 8</p> <p>N/A</p> <p>The Validation document contains a procedure for handling corrections and corrective actions and outlines what actions are to be taken if the data flow activities and control activities are found to not function effectively. The procedure outlines the process for determining and addressing the cause of the error. In accordance with Condition 2.5 of the greenhouse gas permit, the EPA shall be notified in writing within three (3) working days of becoming aware of any factors which may prevent compliance with the conditions of this permit, such as any capacity expansion or change to the approved monitoring plan. Where it is for technical reasons only, temporarily not feasible to apply the tier in the monitoring plan for the activity of fuel as approved by the EPA, the highest achievable tier will be applied until the conditions for the application of the tier approved in the Monitoring Plan have been restored. All necessary measures will be taken by the Energy & Power Manager to allow prompt restoration of the tier in the approved monitoring plan. The temporary change shall be notified to the EPA without undue delay specifying;</p> <p>(i) the reasons for the deviation from the approved tier;</p> <p>(ii) a detailed description of the interim monitoring methodology applied;</p> <p>(iii) the measure taken by Energy & Power Manager to restore the conditions for the application of the tier in the approved monitoring plan;</p> <p>(iv) the anticipated point in time when the application of the approved tier will be resumed.</p> <p>A record of all non-compliance with the approved monitoring plan shall be maintained on-site and shall be available for inspection by relevant persons of the Agency and/or by the Verifier at all reasonable times.</p> |
|---|--|

| | |
|---|------------------------|
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

gg. 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 | Control of Outsourced Activities |
| Reference for procedure | BTCILCWDC1 - 9 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The above document contains a procedure for controlling outsourced activity and identifies how data flow activities and control activities of outsourced processes are checked. The calibration records for the gas oil delivery trucks will be obtained and reviewed on receipt. In relation to verification of the annual emissions report, only verification bodies which are ISO 14065 certified and accredited in accordance with Accredited Verification Regulation (AVR). |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

hh. Record Keeping and Documentation

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

| | |
|--|--|
| Title of procedure | Record Keeping and Documentation |
| Reference for procedure | BTCILCWDC1 - 10 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | Appropriate and relevant documents are maintained for record-keeping and documentation purposes. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |
| List of EN or other standards applied | N/A |

ii. Risk Assessment

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

| Attachment | Description |
|------------|-------------|
| N/A | N/A |

jj. Environmental Management System

Does your organisation have a documented Environmental Management System? Yes

Is the Environmental Management System certified by an accredited organisation? Yes

The standard to which the Environmental Management System is certified: ISO 14001

12. Changes in Operation**kk. 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 | Changes in Operation |
| Reference for procedure | BTCILCWDC1 - 11 |
| Diagram reference | N/A |
| Brief description of procedure. The description should cover the essential parameters and operations performed | The Monitoring Plan contains a procedure for ensuring regular checks are carried out to determine if any changes e.g. in relation to emission sources, source streams are planned for the installation. |
| Post or department responsible for the procedure and for any data generated | Energy & Power Manager |
| Location where records are kept | BTCILCWDC1 data centre |
| Name of IT system used | N/A |

13. Abbreviations

II. 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 |
|--|--|
| 201811291350.pdf | Generator Type 1 - Spec Sheet |
| Gas Oil Delivery Verification.pdf | This document shows that the measuring instrument used for gas oil deliveries has passed a verification test and is in compliance with the Legal Metrology (General) Regulations |
| Geenerator Type 2.pdf | Generator Type 2-Spec sheet |
| BTCIL CW DC1 Thermal Capacity Assessment.xlsx | Contains ratings of all generators and their installation dates. Contains dates of Management takeover of sites and link to further details regarding this. Also contains note explaining that there are no further combustion activities on site such as boilers or pressure washers. |
| Organisational Chart - BTCIL CW DC1 Nov 20 Rev 2.pdf | Organisational Chart - BTCIL CW |

| Attachment | Description |
|--|---|
| BTCIL CW DC 1 Generator Fuel Tank Level_V2.xlsx | Historic tank level reads, invoiced volumes, estimated annual emissions and calculation for uncertainty of tank dip reads |
| Application for Transfer of GHG Permit IE-GHG191-10517-1 FINAL.pdf | Application for Transfer of GHG Permit IE-GHG191-10517-1 FINAL.pdf |
| Catepillar Engines (consolidated).pdf | Caterpillar Engines (consolidated) |
| Perkin Engines (consolidated).pdf | Perkin Engines (consolidated).pdf |
| Calculation - Block A.pdf | Calculation - Block A.pdf |

15. Confidentiality

mm. 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 true form should be treated as commercially confidential/sensitive:

The table below identifies which (if any) sections of the form the operator considers should be treated as commercially confidential and explains why disclosure of this information would cause an adverse effect to commercial interests.

| Section | Justification |
|-------------------|--|
| Emissions Details | This section highlights the number and size of the individual generators. This information is not generally known or accessible to the public, this is because this information may be useful to competitors, it has |

| Section | Justification |
|-------------------------|---|
| | commercial value. Therefore, we request that this information is not disclosed when making other information presented in this application available to the public. |
| Installation Activities | "BT Unit 4027 and Unit 4029 GHG Permit Layout" Management rate data and physical security at their data centres very highly. To this end, the making public of site maps facilitating identification of key facility equipment and geographical location is to be avoided. |

END of Appendix I.