An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities

Interim Transmission Network Charges for Energy Storage

Decision

Reference:	CRU/2026/96	**Date Published:**	16/06/2026		

CRU Strategic Plan 2025-27

Vision, Purpose, and Values

OUR VISION:

Resilient, efficient, sustainable, and safe energy and water services for Ireland.

OUR PURPOSE:

We actively serve the public interest by regulating the provision of energy and water to Irish homes and businesses, while supporting the transformation to net zero.

OUR VALUES:

• Integrity • Professionalism • Openness • Accountability

Executive Summary

In April 2026, the CRU published a consultation paper CRU/202645 ("the Consultation") outlining its minded-to position to revise the interim Transmission Use of System ("TUoS") charges applicable to Energy Storage Units ("ESUs"), superseding the interim arrangements established under Decision CRU/20/115. In setting out its minded-to position in the Consultation the CRU did not seek to revise arrangements for Distribution Use of System ("DUoS") charges applicable to ESUs.

Specifically, the CRU sought stakeholder views on the implementation of a revised decision specifying that standalone ESUs, or those co-located with other forms of generation, should pay Generation TUoS ("G-TUoS") and not Demand TUoS ("D-TUoS") on an interim basis, consistent with the treatment of generation technologies.

The CRU received 17 responses to the Consultation from a range of stakeholders including ESU developers, suppliers, industry associations, and energy providers. All but one respondent explicitly voiced support for the CRU's minded-to position as set out in the Consultation. No respondent indicated that they did not support the CRU's minded-to position.

In support of their position, respondents stated that the proposed approach would:

- better reflect the operational characteristics of ESUs;
- remove distortions arising from volumetric D-TUoS charging;
- support a more level playing field between ESUs and generators;
- improve alignment of charging arrangements across the Single Electricity Market ("SEM"); *and*
- support more efficient deployment and operation of storage assets.

Respondents also highlighted the broader system benefits associated with ESUs, including improved system flexibility, reduced curtailment and redispatch costs, support for renewable generation integration and enhanced security of supply.

However, some respondents were careful to note that, while the change in network charging arrangements presented an improvement relative to current arrangements, further work is required to develop an enduring solution for ESU network charging through the multi-annual Electricity Network Tariff Structure Review ("ENTSR").

Respondents generally supported the proposed timeline to implement the revised charging arrangements for the 2026/2027 tariff year (i.e., for application from 01 October 2026). Several respondents emphasised the importance of timely implementation ahead of the 2026/2027 tariff

year. In its response, EirGrid raised concerns regarding the constrained timeline of implementation, specifically relating to limitations in measuring or inferring house load to calculate ESUs' D-TUoS payments. However, EirGrid also stated that it remains committed to working collaboratively with the CRU to facilitate the implementation of the proposed changes.

The CRU recognises that the implementation of the proposals set out in the Consultation would remove ESUs from the pool of D-TUoS customers and could, in the short-term, increase network charges for the remaining demand customers through recovery of the same revenue requirement across a smaller customer base. In the Consultation, the CRU stated that the potential benefits to customers arising from the matters set out therein, including lower energy prices, system costs, and emissions, would likely outweigh the marginal increase in D-TUoS charges over the longer-term.[1] No respondent disagreed with this assessment from the CRU.

The CRU remains of the view that the potential longer-term benefits to customers arising from the minded-to position set out in the Consultation are likely to outweigh the short-term redistribution resulting in a marginal increase in D-TUoS charges for the remaining demand customers. The net benefits to customers arise given:

- downward pressure on electricity prices due to the potential for energy storage units to store electricity when supply is abundant and release it during times of higher prices,
- reductions in balancing costs, curtailment and redispatch;
- increased integration of indigenous renewable energy, along with associated emissions reductions;
- enhanced incentives to locate storage in ways that reduce the need for network reinforcements;
- increase use of existing assets to maximise value without the need for increased capital investment, *and*
- increased investment in energy storage to provide system services and reduce the need for network reinforcement.

Having considered stakeholder feedback, and as per its minded-to position, the CRU has decided to implement revised transmission use of system network charging arrangements for energy storage units on an interim basis under this decision paper as follows**:**

[1] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision, p.4.

- Standalone ESUs and ESUs co-located with generation will be subject to G-TUoS charges per Schedules GTS-T or GTS-D of the Statement of Charges, consistent with generation units;
- ESUs will pay D-TUoS charges on energy volume and capacity only in respect of house load consumption, in line with the applicable G-TUoS Statement of Charges. For some ESUs, existing metering arrangements do not allow the separate metering of energy consumption related to house load from energy consumption related to charging. In these cases, ESUs will pay relevant components of D-TUoS levied on capacity i.e., Maximum Import Capacity (MIC) related to house load, but not components levied on energy consumption (i.e., MWhs). Section 3.1 explains these provisions in more detail; *and*
- No changes to network charges will apply to storage co-located with demand or for charging arrangements for Autoproducer Users (Schedules ATS-T, ATS-D).

These interim network use of system charging arrangements are introduced further to the revised regulatory arrangements regarding scheduling and dispatch in the Single Electricity Market ("the SEM") introduced last year which enable active participation by energy storage units in the all-island wholesale energy market. These measures, and on-going work to procure Long Duration Energy Storage ("LDES"), will further the benefits to customers listed above, consistent with the objectives of the National Energy Demand Strategy published by the CRU in 2024 and with the work of the Government's National Energy Affordability Task Force.

The decisions set out in this paper will apply from the 2026/27 tariff year for application from 01 October 2026. The CRU acknowledges the work being carried out by EirGrid to implement these decisions from 01 October 2026. The CRU will consider ESU use of system charging arrangements further in the context of the wider, multi-annual ENTSR.

Public/Customer Impact Statement

The CRU's assessment of the impact on customers of this Decision remains unchanged from the assessment carried out for the Consultation. The CRU still expects this Decision to result in the following overall net benefits for customers:

- downward pressure on electricity prices due to the potential for energy storage units to store electricity when supply is abundant and release it during times of higher prices,
- reductions in balancing costs, curtailment and redispatch,
- increased integration of indigenous renewable energy, along with associated emissions reductions,
- enhanced incentives to locate storage in ways that reduce the need for network reinforcements,
- increase use of existing assets to maximise value without the need for increased capital investment, *and*
- increased investment in energy storage to provide system services and reduce the need for network reinforcement.

The CRU acknowledges that revising the basis for charging energy storage units for their use of the transmission network from an approach where they are charged like other network users who demand electricity to an approach where they are charged like generators, will reduce the pool of customers who pay demand use of system charges. The CRU considers that resulting marginal increase in these charges will likely be outweighed by the benefits listed above.

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
ACER	European Union Agency for the Cooperation of Energy Regulators
Act	Electricity Regulation Act, 1999
AIE Regulations	The European Communities (Access to Information on the Environment) Regulations 2007 to 2014
AIRAA	All-Island Resource Adequacy Assessment
Autoproducer User	A User who supplies a natural or legal person who consumes and generates electricity in a Single Premises or, on whose behalf another person generates electricity in the Single Premises where such generation is essentially used in that Single Premises
BESS	Battery Energy Storage Systems
CEP	Clean Energy Package
CRU	Commission for Regulation of Utilities
D-TUoS	Demand Transmission Use of System
ECA	Economic Consulting Associates
EirGrid	The holder of the Transmission System Operator licence granted to it by the CRU under section 14(1)(e) of the Act
ENTSR	Electricity Network Tariff Structure Review
ESBN	ESB Networks
ESI	Energy Storage Ireland
ESU	Energy Storage Unit as defined in the Grid Code
EU	European Union

FNA	Flexibility Needs Assessment
FOI Act	Freedom of Information Act 2014
G-TUoS	Generation Transmission Use of System
kW	Kilowatt
LDES	Long Duration Energy Storage
MEC	Maximum Export Capacity
MIC	Maximum Import Capacity
MW	Megawatt
MWh	Megawatt-hour
NEDS	National Energy Demand Strategy
Network Charges	For the use of the transmission system infrastructure for the transportation of electricity
PN	Physical Notification
Postage Stamp Component	A portion of G-TUoS that is intended to recover a minimum of 70% of the total G-TUoS revenue and is applied evenly across all generators
Regulatory Authorities (RAs)	The Utility Regulator (UR) in Northern Ireland and the Commission for Regulation of Utilities (CRU) in Ireland and the term “Regulatory Authority” shall be construed accordingly to mean any one of them as the context admits or requires
RES	Renewable Energy Source
SDP 2	Initiative 2 of the Scheduling and Dispatch Programme
SEAI	Sustainable Energy Authority of Ireland
SEM	The Single Electricity Market, which is the wholesale all island single electricity market
SEMC	Single Electricity Market Committee

SEMO	Single Electricity Market Operator
SONI	The System Operator in Northern Ireland and the holder of the Licence to Participate in the Transmission of Electricity granted by the UR under the Electricity (Northern Ireland) Order 1992
System Services Charge	For the recovery of the costs arising from the operation and security of the transmission system
TAO	Transmission Asset Owner
TNUoS charges	Transmission Network Use of System charges that recover the cost of installing and maintaining the transmission system in England, Wales, Scotland, and offshore
Triad	The half-hour settlement period of highest demand on the Great Britain's electricity transmission system between November and February (inclusive) each year
TSO	Transmission System Operator
TUoS	Transmission Use of System
UR	Utility Regulatory in Northern Ireland

1. Introduction

1.1. Background

EirGrid's Grid Code defines ESUs as "*Generation Units using storage devices to generate and consume electricity as, or as part of, a PPM*" (Power Park Module).[2] Prior to 2020, ESU capacity in Ireland totalled approximately 19.5 MW.[3] ESUs connected to the transmission network paid Transmission System Use of System charges ("TUoS") on both energy withdrawals (Demand TUoS, or "D-TUoS") and injections (Generation TUoS, or "G-TUoS") given the potential to impose costs to the transmission network from both activities.[4]

Battery Energy Storage Systems ("BESS") have operated under an interim arrangement for transmission network charging since 2020. The CRU published a Decision in 2020 revising the above charging arrangements on an interim basis as it was considered that levying both D-TUoS and G-TUoS on these units may not have accurately reflected the costs imposed on the network by BESS and posed a potential barrier to entry.

However, since the 2020 Decision, both the anticipated investment in ESUs and their role on the system have changed substantially, enabled by new policy and market design changes such as Initiative 2 of the Scheduling and Dispatch Programme ("SDP 2").[5] These changes increase the scope of potential system benefits delivered by ESUs through participation in wholesale markets. In addition, the ENTSR was postponed in 2022, with CRU resourcing diverted to manage the impact on energy markets arising from the Russian invasion of Ukraine.

Given these changes and calls from industry to charge ESUs on the basis of G-TUoS in alignment with arrangements in Northern Ireland, the CRU published a consultation paper[6] to gather feedback on its minded-to decision to implement revised network charging arrangements for ESUs under which these units would pay G-TUoS and not D-TUoS on an interim basis in advance of the completion of the wider, multi-annual electricity network tariff structure review ("ENTSR").

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[2] EirGrid (17 October 2025), EirGrid Grid Code Version 16, p. 417.
[3] SEAI (December 2025), Energy in Ireland 2025 Report, p.70.
[4] The CRU (June 2020), Network Charges for Commercial Storage Units Interim Solution Consultation Paper, CRU/20/066, p.1. See also SEAI (December 2025), Energy in Ireland 2025 Report, Table 4.10.
[5] EirGrid, SEMO & SONI (November 2025), Overview of SDP Solution for Battery Units Version 2.0.
[6] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision.

The following considerations informed the CRU's minded-to decision to levy G-TUoS charges on ESUs:

1. The role of ESUs in the electricity market has changed since 2020, increasing both in installed capacity as well as moving from providing system services to actively contributing to balancing and congestion relief.
2. The locational element in G-TUoS may incentivise more efficient siting of ESUs.
3. Applying G-TUoS to ESUs promotes a level playing field for ESUs across the SEM.
4. Applying G-TUoS charges promotes a level playing field between ESUs and generation technologies offering similar services.
5. Applying G-TUoS to ESUs avoids distortions resulting from the volumetric nature of D-TUoS charges.

In the Consultation the CRU explained that it intended to apply the revised interim network use of system charging arrangements to all ESUs which are standalone units or co-located with generation, to ensure consistency with generation units. The CRU's minded-to position did not seek to change charging arrangements for ESUs co-located with demand or for Autoproducer Users,[7] nor did it seek to update DUoS charges.

The CRU recognises that this proposed change has the potential to increase charges for the remainder of D-TUoS customers as set out in the Impact Statement in the Consultation.[8] The CRU estimates that ESUs currently account for around 2%[9] of D-TUoS revenues in Ireland and applying G-TUoS charges to ESUs will result in an additional €24.0 to €26.4 million to be paid annually through D-TUoS charges by the remaining customers.[10]

This decision document summarises responses from industry stakeholders, outlines the CRU response to specific issues, and provides the CRU's final decision.

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[7] The CRU notes that Turlough Hill already pays transmission network charges on the basis of G-TUoS. See also: EirGrid and SONI (29 August 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS).
[8] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision, p.4.
[9] This calculation is based on the existing methodology to implement the cap on network charges per EU Regulation 838/2010.
[10] Based on c. €1,278 million in allowed revenues to be recovered via D-TUoS in the 2025/2026 tariff year. The remainder of the allowed revenues (c. €118 million) is recovered through G-TUoS. See: EirGrid and SONI (8 September 2025), Approved 2025/2026 Generator Use of System Charges (GTUoS), Accompanying Note, p. 5.

1.2. Related Documents

- Network Charges for Commercial Storage Units Interim Solution (CRU/20/115)
- Transmission Network Charges for Energy Storage - Minded-to Interim Decision (CRU/202645)

1.3. Legal and Policy Background

The CRU's remit regarding electricity network use of system charges is primarily set out in Sections 35 and 36 of the Electricity Regulation Act, 1999 (the Act). Here, the CRU may give directions to the regulated electricity network companies from time to time regarding the basis for use of system charges and approves statements of charges received further to such directions.

More generally, the CRU's functions and duties are set out principally in Section 9 of the Act. Here, the CRU shall carry out its statutory functions in a manner which does not discriminate unfairly between relevant stakeholders and with regard to a range of factors which are relevant to the matters under consideration here. For example, the CRU must have regard, *inter alia*, to:[11]

- the need to protect the interests of final customers and to secure that all their reasonable demands for electricity are satisfied;
- the need to promote the continuity, security and quality of supplies of electricity;
- the need to promote competition;
- the need to promote efficiency and the use of renewable, sustainable or alternative forms of energy;
- the benefits of developing demand-side participation in electricity markets, including through energy efficiency, demand-response, distributed generation, energy storage and the use of digital technologies; and
- the use of energy storage technologies in participating in the balancing of electricity demand and supply.

Section 9 also states that, without prejudice to the duties of the Minister and the CRU not to discriminate as above, nothing in the Act shall unduly hamper *'…investments into, in particular,*

[11] Electricity Regulation Act 1999 , Section 9: Functions of Commission.

variable and flexible energy generation, energy storage and the deployment of electromobility and new interconnectors between Member States'.[12]

Other governing legislation is also relevant, including:

- Article 59 of **EU Directive 2019/944** states that each regulatory authority has the duty to fix or approve, in accordance with transparent criteria, transmission or distribution tariffs or their methodologies, or both;[13]
- Matters prescribed in Article 18 of **EU Regulation 2019/943**;[14] and
- Requirements set out in **EU Regulation 838/2010** regarding inter TSO compensation and a common regulatory approach to transmission charging.[15]

Article 18 of EU Regulation 2019/943 is of particular note as it sets out requirements in relation to network charges, both connection and use of system, including, for example, that they shall be cost-reflective, transparent, take into account the need for network security and flexibility, shall be applied in a non-discriminatory manner and shall not include unrelated costs supporting unrelated policy objectives. It also states that they shall not discriminate either positively or negatively against energy storage or aggregation and shall not create disincentives for self-generation, self-consumption or for participation in demand response.

The CRU is a relevant body within the meaning of Section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended) (the 2015 Act). Accordingly, the CRU has considered whether the outcome of this Decision is consistent with the climate objectives set out in section 15(1) (a) – (e) of the 2015 Act and has concluded that it is, in so far as practicable, consistent with these objectives.

1.4. Structure of Paper

This paper is structured as follows:

- **Section 2** summarises stakeholder feedback on the four consultation questions and Public/Customer Impact Statement, and outlines the CRU's response to the issues raised, including how these informed the final decision;
- **Section 3** outlines the CRU's final decision; *and*

[12] Electricity Regulation Act 1999 (revised up to 31 December 2025), Section 9: Functions of Commission, para. 4 (ab) (iii).
[13] EU Directive 2019/944, Article 59, para. 1 (a).
[14] EU Regulation 2019/943, Article 18.
[15] EU Regulation 838/2010.

- **Section 4** outlines the next steps.

2. Summary of Responses

This section summarises stakeholder responses to the Consultation and outlines the CRU's response to the comments raised. Sections 2.1 to 2.4 each consider responses related to the four questions outlined in the Consultation. Section 2.5 considers responses which specifically related to the Public/Customer Impact Statement which the CRU provided in the Consultation.

2.1. Consultation Question 1

Do you agree with the CRU's minded-to position to remove D-TUoS for ESUs and charge on the basis of G-TUoS and not D-TUoS, consistent with other generation units?

17 stakeholders from a range of different groups, including ESU developers, energy providers, industry associations, energy suppliers, and EirGrid responded to this question. The responses received generally indicated broad support for the 'minded-to' position set out in the Consultation to remove D-TUoS for ESUs, and charge on the basis of G-TUoS. Specifically:

- 16 respondents explicitly stated support for the CRU's minded-to position. In voicing their support, all respondents raised potential benefits of the minded-to position which are discussed in Section 2.2 below. Of these, five respondents explicitly stated that they expected a net benefit to customers arising from the minded-to position.
- EirGrid acknowledged the minded-to position, noting that it is subject to further comprehensive review ahead of an enduring solution. It agreed that charging ESUs G-TUoS was in line with the treatment of generators, consistent with charges in Northern Ireland, and appropriately recognised the role of storage as a flexibility provider.

While stakeholders generally voiced support for the CRU's minded-to position, some stakeholders were clear that they supported this as an interim measure while a more enduring solution was developed. Sections 2.2 to 2.4 provide further discussion of responses relating to a more enduring approach.

CRU Response

The CRU notes the general support from all respondents for the minded-to position set out in the Consultation. The CRU agrees with respondents' assessment of the potential benefits arising from the minded-to position and discusses these in Section 2.2 below. Section 2.5 below

considers responses which specifically relate to the estimated net impact to customers arising from the matters set out in the Consultation.

Notwithstanding this, the CRU acknowledges that a more comprehensive review is likely to be necessary ahead of a more enduring approach to develop ESU network charges that reflect the transmission network costs that tend to be imposed by ESUs. Sections 2.2 to 2.4 set out the CRU's response to stakeholder feedback on specific issues relating to both the interim and enduring approaches.

2.2. Consultation Question 2

Do you agree with the reasons stated for the position, which are that replacing D-TUoS charges for ESUs with G-TUoS:

- *provides a locational siting signal for ESUs;*
- *promotes a level playing field across ESUs located across the SEM;*
- *promotes a level playing field between ESUs and generators within the SEM; and*
- *promotes ESUs' ability to provide system benefits in wholesale markets by removing the distortions of volumetric charging?*

Seventeen stakeholders from a range of different groups, including ESU developers, energy providers, industry associations, energy suppliers and EirGrid responded to this question. Below, the CRU summarises stakeholder responses to each argument in turn.

2.2.1. Consultation Question 2(a): Locational siting signal for ESUs

Respondents generally agreed that the minded-to position set out in the Consultation would improve locational siting signals for ESUs, but that (i) the locational signals sent by G-TUoS may not always be appropriate signals for the efficient siting of ESUs; and/or (ii) a more comprehensive review is necessary to inform the design of enduring charging arrangements. In summary:

- All 17 respondents explicitly agreed that the move to G-TUoS would provide additional locational siting signals to guide future ESU investment. Respondents noted that locational signals would allow ESUs to dynamically respond to system conditions and network needs. Respondents expressed the view that locational signals would encourage siting of future ESUs near demand centres, where G-TUoS charges are typically low, reducing reinforcement needs and facilitating efficient system operation by ensuring energy is available where and when it is needed.

- One respondent agreed that G-TUoS represents a significant improvement versus the present charging regime but stated that G-TUoS would send an "inefficient market signal" in relation to locational signalling. The respondent explained that this inefficiency arises because G-TUoS charges tend to be highest in areas with high renewable constraint, where ESUs can provide benefits through renewable absorption, congestion relief, redispatch reduction, and potential deferral of network reinforcement. The respondent acknowledged it was possible that other economic factors such as the availability of significant surplus renewable energy might be sufficient to offset this signal but expressed the view that it was nonetheless a significant inefficiency. The respondent suggested appropriate locational signals for storage should be further developed as part of an enduring solution, and in alignment with the Flexibility Needs Assessment ("FNA"), potentially by looking at how storage is reflected in G-TUoS calculation studies.
- Similarly, another respondent agreed that G-TUoS may provide a locational siting signal but argued that the signal may not appropriately reflect the system value of storage, as it is derived from generator-related cost drivers. The respondent explained that ESUs located close to constrained generation assets may face high G-TUoS charges despite their potential to reduce curtailment and alleviate system constraints. The respondent also highlighted that it was important to consider how the €2.5/MWh cap set under EU Directive 838/2010 might impact any locational signal.
- Another respondent stated that G-TUoS represents an improvement, but that additional refinement may be required to fully reflect the value of storage in managing constraints and supporting network efficiency.
- Two other respondents also supported the position that locational signals for ESUs should continue to evolve in alignment with the FNA.
- One respondent noted that the annual process to calculate G-TUoS charges lacks transparency and predictability, meaning it is at best a short-term indicator of relative network conditions, rather than an enduring locational signal.

CRU Response

The CRU notes feedback from respondents that the move to G-TUoS would improve locational siting signals for ESUs, and that this is likely to result in system benefits. The CRU agrees that sending locational signals could incentivise more efficient siting by ESUs, and that moving to G-TUoS on an interim basis is more conceptually aligned with the role of ESUs than D-TUoS, which continues to classify ESU demand as if it were adding to system load rather than balancing and providing congestion relief.

As outlined in the Consultation, the CRU acknowledges that locational siting signals from G-TUoS may not always be appropriate for ESUs, specifically regarding the signals to locate ESUs away from demand centres to absorb surplus generation (e.g. in areas where network constraints arise from the need to evacuate a surplus of generation).[16] The CRU emphasises that its decision applies on an interim basis and acknowledges the need to further examine locational price signals for ESUs as part of broader analysis to design more enduring charging arrangements. However, the CRU recognises that this will take time to complete and considers that the reasons set out above necessitate revised interim network use of system charging arrangements now in order to promote efficiency, the use of indigenous renewable, sustainable or alternative forms of energy, and to protect the interests of final electricity customers.

As set out by some respondents, and beyond its review of network tariffs, the CRU is also currently working with EirGrid on Ireland's first National FNA, which follows an EU-wide methodology to examine future flexibility requirements.[17]

The CRU notes that the methodology to set G-TUoS falls under the remit of the SEM Committee (SEMC) and is outside of the scope of this Decision.

2.2.2. Consultation Question 2(b): Level playing field for ESUs across the SEM

Respondents generally agreed that the minded-to position set out in the Consultation would provide a more level playing field across the SEM, by better aligning network tariffs for ESUs in Ireland and Northern Ireland:

- Sixteen respondents explicitly stated that they agreed that the minded-to position set out in the Consultation would result in a more level playing field for ESUs across the SEM. Respondents noted that it would reduce inconsistencies between jurisdictions, support fair competition, reduce distortions in investment decisions, and support a more holistic approach to storage deployment.
- One respondent requested further clarity on the treatment of ESUs connected directly to the distribution network ("distribution-connected ESUs") and provided its view that the interim charging scheme should apply to all distribution- and transmission-connected ESUs.
- One respondent expressed the view that, at present, two cross-jurisdictional distortions exist: (i) difference in the total charge level; and (ii) difference in the charge structure

[16] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision, pp. 23-24.
[17] The CRU (13 April 2026), CRU/202627 Flexibility Needs Assessment.

(e.g., by levying a volumetric component in Ireland only). The respondent noted that the minded-to position set out in the Consultation would align the charge structure, but not the charge level, since underlying revenues recovered through network tariffs are set on a jurisdictional basis. The respondent also noted that G-TUoS charges are capped at €2.5/MWh in Ireland, in line with EU Directive 838/2010.

- One respondent chose not to comment on Consultation Question 2(b).

CRU Response

The CRU notes the general support from respondents that the move to G-TUoS will result in a more level playing field for ESUs across the SEM. The CRU agrees with respondents that improved jurisdictional alignment resulting from this move is likely to support fair competition, reduce distortions in investment decisions, and support a more holistic approach to storage deployment.

For clarity, the minded-to position set out in the Consultation would mean that all ESUs connected at the transmission or distribution level would pay transmission network charges on the basis of G-TUoS (i.e., per Schedules GTS-T and GTS-D in the Statement of Charges).[18] Under these arrangements, ESUs at the distribution level would pay transmission network charges depending on their Maximum Export Capacity (MEC), per Schedule GTS-D:

- Distribution-connected ESUs with an MEC ***greater than*** 5 MW would be subject to G-TUoS charges, and D-TUoS charges for house load only.
- Distribution-connected ESUs with an MEC ***less than or equal to*** 5 MW would ***not*** be subject to Generation Network Location-Based Capacity Charge within G-TUoS, but would be subject to pay D-TUoS for house load only.

The CRU notes stakeholder feedback on the different total charge level in Ireland and Northern Ireland. This is consistent with the legal remit of both the CRU and UR and is outside of the scope of this review. However, the €2.5/MWh cap on average G-TUoS established by EU Directive 838/2010 applies to both jurisdictions equally.

2.2.3. Consultation Question 2(c): Level playing field between ESUs and generators

All 17 respondents agreed that the minded-to position set out in the Consultation would result in a more level playing field between ESUs and generators in the SEM. Respondents noted that it

[18] EirGrid (15 September 2025), 2025-2026 Statement of Charges, pp. 12-13.

would promote technology neutrality by aligning network charges for ESUs with generators, support efficient competition, improve cost-reflectivity and fairness in charging, and ensure storage is not penalised relative to other flexibility options.

One respondent stated that the minded-to position set out in the Consultation is important as it supports ESUs and other technologies' ability to compete on an equivalent basis when providing energy, capacity, and system support services to the market.

CRU Response

The CRU notes the general support from respondents for the proposals in the Consultation given their views that the move to G-TUoS will result in a more level playing field between ESUs and generators and may improve the cost-reflectivity of transmission network charging arrangements for ESUs. The CRU agrees with respondents that the proposals promote a level playing field between different technologies which are in competition to provide the same service. The CRU also notes the importance of considering potential distortions arising from different charging arrangements for competing technologies as part of an enduring solution.

2.2.4. Consultation Question 2(d): Removing volumetric charges for ESUs

All 17 respondents agreed that removing volumetric charging by switching to G-TUoS would promote ESUs' ability to deliver system benefits. Respondents said that volumetric charges introduce distortions in market signals for ESUs, and that removing these distortions would enable more efficient participation of ESUs in wholesale markets, reduce curtailment and balancing costs, and improve system flexibility.

CRU Response

The CRU notes the general support from respondents for the matters set out in the Consultation, specifically that removing volumetric charging by switching to G-TUoS would promote ESUs' ability to deliver system benefits. The CRU agrees with respondents that the minded-to position as consulted on promotes ESUs' ability to deliver system benefits by removing distortions to enable more efficient participation in wholesale markets, reducing curtailment and balancing costs, and improving system flexibility.

2.3. Consultation Question 3

Do you have any feedback regarding the CRU's proposed implementation of its decision?

14 stakeholders from different groups, including ESU developers, energy providers, industry associations, energy suppliers and EirGrid responded to this question. The responses received generally supported the CRU's proposed implementation timeline:

- 13 respondents supported the proposed implementation for the 2026/2027 tariff year. Some respondents emphasised the importance of timely implementation for the 2026/2027 tariff year. Respondents also emphasised the importance of the timely development of an enduring charging framework that is appropriate for storage through the separate ENTSR.
- One respondent highlighted the importance of ensuring market participants have visibility of final arrangements for network charges well in advance of implementation, and the importance of clear communication on transitional arrangements.
- One respondent noted that the proposed change interacts with parallel developments, including scheduling and dispatch arrangements, hybrid connections, and wider flexibility mechanisms. The respondent suggested that coordination with these developments is important to ensure consistency in how storage is treated across the system.
- One respondent noted that the framework for G-TUoS already exists in Ireland and Northern Ireland, so the matters set out in the Consultation should be relatively simple to implement.
- EirGrid identified concerns regarding the constrained timeline of implementation for the 2026/2027 tariff year, particularly concerning charging D-TUoS for house load, which is not metered for ESUs. Specifically, EirGrid highlighted that house load could not be measured or inferred from available metering data, and that the CRU might therefore need to explore alternative means by which ESUs would make D-TUoS payments (e.g., on a capacity basis, or some other proxy). However, EirGrid stated that it remained committed to working collaboratively with the CRU to facilitate the implementation of the proposed changes.

CRU Response

The CRU notes the general support from respondents on the proposed implementation approach, as well as the importance of meeting the implementing timeline for the 2026/2027 tariff year (i.e., by 01 October 2026). The CRU remains committed to adhering to this implementation timeline.

The CRU acknowledges the importance of ensuring market participants have visibility of changes to charging arrangements for ESUs, including the importance of clear communication on

transitional arrangements. In line with existing processes, G-TUoS tariffs levied on ESUs under this Decision will apply from 01 October 2026 (start of the 2026/2027 tariff year). The methodology to set G-TUoS will not change under this Decision. The CRU intends to assess enduring use of system network charging arrangements under the ENTSR, the scope of which is being consulted on later this year. The CRU notes the remit of the SEMC in relation to G-TUoS charging structures.

The CRU will continue to consider parallel developments which interact with ESU network charging. As set out in the Consultation, developments such as Initiative 2 of the Scheduling and Dispatch Program have resulted in changes to the way in which ESUs operate in the SEM.[19]

The CRU acknowledges concerns related to D-TUoS charges for house load consumption by ESUs. The CRU has engaged with EirGrid during the consultation period to progress a pragmatic way forward regarding this issue given the absence of metered data regarding house load for ESUs. The approach to this issue set out in Section 3 of this paper seeks to provide for a charging method that is feasible, given the above constraint, and determined on a transparent basis to support charging of D-TUoS to ESUs to the extent practical given equity objectives.

2.4. Consultation Question 4

Should the CRU be considering other factors in evaluating the effectiveness of this interim decision and in future work regarding a more enduring decision?

10 stakeholders, including ESU developers, energy providers, industry associations, energy suppliers and EirGrid responded to this question. The responses suggested a wide range of additional factors for the CRU to consider as part its decision. These responses are grouped according to six themes:

- Wider system interaction/implications (Section 2.4.1);
- Distribution-connected ESUs (Section 2.4.2);
- Hybrid projects (Section 2.4.3);
- Cost-reflectivity of charges (Section 2.4.4);
- Ongoing monitoring (Section 2.4.5); *and*
- Constrained implementation timelines (Section 0).

[19] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision, p.20.

2.4.1. Wider system interaction/implications

- One respondent highlighted that the CRU should consider the effect of future ESU capacity on the need for investment in Ireland's transmission network.
- One respondent noted that investment in energy storage contributes to security of supply, supports RES integration, and displaced fossil fuels.
- One respondent noted that network charge reform complements development of procurement mechanisms (e.g., ESBN Demand Flex, TSO LDES Procurement, Capacity Markets, etc.).
- One respondent noted that the CRU should build on this interim measure by undertaking a full assessment of storage treatment across all elements of the regulatory and market framework.
- One respondent noted that storage interacts with multiple elements of market design, and that charging arrangements should align with development in system services, market operation, and flexibility requirements.
- One respondent said that the market should compensate system value provided by storage, particularly LDES, and that increasing LDES at key points on the network could nearly double the transfer capacity of critical circuits.
- One respondent emphasised that it was unclear what factors the CRU is already considering for the purposes of evaluating the effectiveness of this decision. The respondent noted that network tariffs are only one factor, albeit an important one, that will impact how effectively ESU's can support the Irish electricity system.

CRU Response

The CRU recognises that investment in ESUs can contribute to security of supply, support the integration of renewable generation, reduce reliance on fossil fuel generation, and facilitate more efficient operation of the electricity system. The CRU agrees that future ESU deployment may also influence future transmission network investment requirements. In particular, the CRU recognises that network charges that are cost-reflective may help to incentivise efficient siting of future ESUs in areas that alleviate some network constraints and reduce reinforcement requirements.

The CRU also acknowledges respondents' views that network charging reform may complement the development of wider flexibility and procurement mechanisms, including ESBN Demand Flex initiatives, TSO procurement processes for LDES, system services arrangements, and capacity market design. The CRU agrees that the development of more enduring charging arrangements

should consider potential interactions with other developments in market design, operational requirements for ESUs, and flexibility procurement frameworks.

The CRU further notes respondents' views that network tariffs are only one factor influencing the extent to which ESUs can efficiently support the electricity system. While network charging arrangements can provide important investment and operational signals, the CRU recognises that outcomes for storage deployment will also depend on wider market, regulatory, and procurement arrangements but that these factors are out of scope of this consultation process and Decision.

2.4.2. Distribution-connected ESUs

- One respondent noted that distribution-connected energy storage assets in the SEM are currently subject to full TUoS (either DTUoS or GTUoS) and to DUoS charges, resulting in double charging. The respondent also noted that this is atypical compared to other markets and does not reflect the behaviour of this type of asset. The respondent suggested that distribution-connected storage should pay DUoS charges only and be exempt from (or pay significantly lower) TUoS charges.

CRU Response

For clarity, the scope of the CRU's Consultation and of this Decision do not seek to revise DUoS charging arrangements for ESUs but only TUoS charging arrangements. Here, distribution-connected ESU will be subject to G-TUoS only, per Schedule GTS-D.[20] See Section 2.2.2 for further explanation of G-TUoS charges, which vary according to the unit's MEC. The CRU intends to assess enduring distribution network charging arrangements through the multi-annual ENTSR.

2.4.3. Hybrid projects

- Two respondents said that the minded-to position set out in the Consultation would facilitate development of hybrid projects with shared connections.

CRU Response

The CRU acknowledges respondents' views that the minded-to position set out in the Consultation may facilitate the development of hybrid projects with shared network connections. The CRU recognises that network tariffs have a role in sending cost-reflective price signals that

[20] EirGrid, 2025-2026 Statement of Charges, 15 September 2025, pp. 12-13.

incentivise efficient siting of ESUs across the network. The CRU also notes that hybrid and co-located projects may provide wider system benefits, including improved network utilisation, increased operational flexibility, and more efficient integration of renewable generation.

2.4.4. Cost-reflectivity of charges

- One respondent noted that work being undertaken as part of ENTSR can ensure that network charges are fairly applied to network users.
- One respondent said that work must continue to develop an enduring network charges framework that reflects the flexibility and capacity that ESUs provide to the grid.
- One respondent said that the enduring solution should aim to deliver a consistent, predictable, and cost-reflective approach that recognises the role of storage.
- One respondent suggested the CRU should consider policies (e.g., discounting fixed additions to power costs) that incentivise use of surplus renewable energy for longer-term space and hot water heating.

CRU Response

The CRU recognises that designing charges to be as cost reflective as possible (i.e., signalling the transmission network costs that different types of usage tend to impose) can provide price signals to participants that incentivise efficient siting and use of the grid. The CRU previously proposed that cost-reflectivity should be included as a principle to evaluate network tariff structure reforms within the scope of the 2021 ENTSR[21] and intends consult on these principles later this year.

The CRU considers that the proposals set out in the Consultation are more conceptually aligned with the role of ESUs than charging them D-TUoS, which treats ESUs as demand as if it were adding to system load at times of constraint, rather than balancing and providing congestion relief. However, as set out above, the CRU acknowledges that locational siting signals from G-TUoS may not always be appropriate for ESUs.

The CRU notes that charges for heat storage technologies are outside of the scope of this review.

2.4.5. Ongoing monitoring

- One respondent stated that it was important that the CRU monitors how the revised framework impacts the operation and utilisation of ESUs in practice.

[21] The CRU (18 October 2021), CRU/21/123 CRU's Electricity Network Tariff Structure Review: Objectives, Principles & Call for Evidence, p.21.

CRU Response

The CRU acknowledges the importance of monitoring how the revised charging framework impacts the operation and utilisation of storage assets ESUs in practice. The CRU agrees that ongoing assessment of operational and market outcomes following implementation will be important in evaluating whether the revised arrangements are incentivising efficient deployment of ESUs, while delivering the intended system and consumer benefits. However, it also recognises the challenge of isolating the impact on the operation and utilisation of ESUs specifically from the proposed change in charging arrangements as distinct from all other market/regulatory developments that may impact on how ESUs operate. The CRU will engage with EirGrid regarding the monitoring of operational and market outcomes following implementation of this Decision.

Constrained implementation timelines

- One respondent noted that the constrained implementation timeline means that it does not consider it appropriate for additional factors to be considered in assessing the effectiveness of this interim measure. The respondent suggested that any such factors may be more suitably addressed as part of the broader work to develop more enduring solutions within the scope of the ENTSR project.

CRU Response

The CRU considers that there is a strong body of evidence that supports implementation of the minded-to position set out in the Consultation. The CRU also notes that no respondent indicated opposition to the CRU's minded-to position.

The CRU is aware that there are matters which highlight the need to carry out comprehensive assessment to design a more enduring solution for ESUs' network charging arrangements. The CRU intends to assess enduring use of system network charging arrangements under the ENTSR, the scope of which is being consulted on later this year. The CRU notes the remit of the SEMC in relation to G-TUoS charging structures.

2.5. Responses on the Public/Customer Impact Statement

In the Consultation the CRU provided a Public/Customer Impact Statement (the "Impact Statement") outlining expected system benefits and distributional changes to network tariffs arising from the minded-to position set out in that paper.

Nine stakeholders provided responses which related to the Impact Assessment. Specifically:

- Eight respondents highlighted system benefits associated with the minded-to position set out in the Consultation. Several of these respondents cited evidence from Economic Consulting Associated (ECA) which estimated an increase in storage utilisation of 30%, and cost-savings of €37 million per annum, following removal of import charges on storage assets. Of the eight respondents, five explained that they expected that the consumer benefits arising from the proposals set out in the Consultation were likely to outweigh any potential increases in network charges (e.g., due to redistribution of D-TUoS charges to the remaining, non-ESU demand customers) over the longer-term.
- The one remaining respondent did not comment on the expected net cost impact of the minded-to position set out in the Consultation. The respondent did note that distributional impacts were uncertain, since including ESUs in the G-TUoS charging base would affect the cost allocation across customer groups, but noted that that this can only be confirmed retrospectively depending on whether GTUoS payments remain within the €2.5/MWh cap from EU Directive 838/2010. The respondent noted that there is an interaction where G-TUoS charges above the cap are returned to generators and funded through D-TUoS, and that this interaction would need to be considered in the context of any changes to ESU tariffing arrangements.

CRU Response

The CRU recognises that the implementation of the minded-to position set out in the Consultation would remove ESUs from the pool of D-TUoS customers and could, in the short-term, increase network charges for the remaining demand customers through recovery of the same revenue requirement across a smaller customer base. In the Consultation, the CRU stated that benefits to customers from the implementation of the minded-to position, including lower energy prices, system costs, and emissions, would likely outweigh the marginal increase in D-TUoS charges over the longer-term.[22] No respondent disagreed with this assessment from the CRU. The CRU remains of the view that the potential longer-term benefits to customers arising from the implementation of the minded-to position set out in the Consultation are likely to outweigh the short-term redistribution resulting in a marginal increase in D-TUoS charges for the remaining demand customers.

[22] The CRU (15 April 2026), 202645 Transmission Network Charges for Energy Storage Minded-to Interim Decision, p.4.

In the Consultation the CRU provided estimates of the distributional impact on customers arising from the move from D-TUoS to G-TUoS charges for ESUs. This estimate reflected the cap on the amount recovered from generators. The CRU agrees that true distributional impacts can only be confirmed retrospectively and remain subject to the €2.5/MWh cap set under EU Directive 838/2010.

3. Decision

Having considered stakeholder feedback, **the CRU has decided to implement a Decision per its minded-to position as follows**:

- Standalone ESUs and ESUs co-located with generation will be subject to G-TUoS charges per Schedules GTS-T or GTS-D of the Statement of Charges, consistent with generation units;
- ESUs will pay D-TUoS charges on energy volume and capacity only in respect of house load consumption, in line with the applicable G-TUoS Statement of Charges. For some ESUs, existing metering arrangements do not allow the separate metering of energy consumption related to house load from energy consumption related to charging. In these cases, ESUs will pay relevant components of D-TUoS levied on capacity i.e., Maximum Import Capacity (MIC) related to house load, but not components levied on energy consumption (i.e., MWhs). Section 3.1 explains these provisions in more detail.
- No changes to network charges will apply to storage co-located with demand or for charging arrangements for Autoproducer Users.

Table 1 below provides the relevant Schedule in the Statement of Charges for each type of ESU pre- and post-implementation of this Decision.

This Decision will apply from 01 October 2026 on an interim basis while the CRU progresses the multi-annual ENTSR.

Table 1: Changes to Network Charges by ESU Type

ESU Type	Post-Implementation	Pre-Implementation
Transmission-connected ESUs		
Standalone	GTS-T	DTS-T
Co-located with generation	GTS-T	DTS-T
Co-located with demand	No change post-implementation	DTS-T
Autoproducer	No change post-implementation	ATS-T
Distribution-connected ESUs		
Standalone	GTS-D	DTS-D
Co-located with generation	GTS-D	DTS-D
Co-located with demand	No change post-implementation	DTS-D
Autoproducer Users	No change post-implementation	ATS-D

This CRU Decision will apply for an interim basis only. The CRU intends to conduct more comprehensive assessment and identify enduring approaches to network use of system charging structures under the multi-annual ENTSR, the scope of which is being consulted on later this year. The CRU notes the remit of the SEMC in relation to G-TUoS tariff structures.

3.1. D-TUoS Charges for ESU House Load

In its response to the Consultation, EirGrid identified system limitations which prevent it from metering house load consumption volumes for some ESUs (see Section 2.3 above). The CRU has been working with EirGrid to develop an approach to D-TUoS charges for ESU house load that can feasibly be implemented ahead of the 2026/2027 tariff year.

ESUs are unique in that they import energy from the grid both for charging, and for house load consumption. Extending existing TUoS arrangements as applied to generators and Turlough Hill would mean that ESUs should be liable to pay G-TUoS and also D-TUoS on house load only (and not consumption to charge the storage unit).

D-TUoS charges are levied on both energy consumption (i.e., MWhs) and capacity (i.e., MIC).

EirGrid already has a process to collect and validate ESUs' house load MIC for the purpose of calculating Public Service Obligation (PSO) charges. Accordingly, this Decision specifies that ESUs will pay the Demand Network Capacity Charge[23] of D-TUoS on the basis of house load MIC as identified through existing arrangements that enable the charging of the PSO, and as established by EirGrid.[24]

However, for many ESUs, existing metering arrangements do not allow separate identification of consumption for house load and consumption for charging. Accordingly, on an interim basis, where an ESU's energy consumption related to house load is not separately metered, that ESU ***will not pay*** any volumetric charge elements of D-TUoS levied on house load. Table 2 summarises appliable D-TUoS charge components for ESUs with, and without separately metered house load consumption.

23 EirGrid (15 September 2025), 2025-2026 Statement of Charges.
24 EirGrid (23 January 2020), Derivation of Agreed House Load MIC for Commercial Storage Units.

Table 2: Applicability of D-TUoS Charge Components for ESU House Load

D-TUoS Category	Components Paid if Energy Consumption for House Load *is* Separately Metered and Identified	Components Paid if Energy Consumption for House Load *is not* Separately Metered and Identified
DTS-T	Demand Network Capacity Charge Demand Network Unauthorised Usage Charge Demand Network Transfer Charge Demand System Services Charge	Demand Network Capacity Charge
DTS-D1	Demand Network Capacity Charge Demand Network Transfer Charge Demand System Services Charge	Demand Network Capacity Charge
DTS-D2	Demand Network Capacity Charge Demand Network Transfer Charge Demand System Services Charge	N/A[25]

For the avoidance of doubt, any ESU which does have separate metering for house load will be liable to pay all capacity and volumetric elements of its relevant D-TUoS charge schedule.

4. Next Steps

The decisions set out in this paper will be implemented for the 2026/27 tariff year (i.e. for application from 01 October 2026). The CRU acknowledges EirGrid's co-operation in facilitating implementation of the revised interim network use of system charging arrangements set out in this paper for the upcoming tariff year.

The CRU will engage with EirGrid to establish monitoring and reporting arrangements regarding the operational and market impacts of this Decision on exiting energy storage units and on

[25] Transmission services charge DTS-D2 does not have a charge element that is levied on capacity.

additional units installed over the course of the application of this Decision. This will include consideration of any impacts of new /differing types of storage technologies that may have different operational and/or technical characteristic to the current suite of installed storage units which may result in unintended outcomes. The CRU acknowledges the challenge of isolating the impacts arising from the introduction of the revised network use of system charging arrangements set out in this paper as distinct from all other market/regulatory developments that may impact on the above. The CRU will be mindful of this in developing the monitoring and reporting approach.