



ÁDARÁS EITHEORACHA NA hÉIREANN
IRISH AVIATION AUTHORITY

Appendix 1: CIP27 Review by Project

July 2026



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1. Sustainability

- 1.1 The Sustainability group was first introduced in Dublin Airport's submission for the 2022 Review Decision. CIP27 builds on the CIP2020+ Sustainability group and seeks to further Dublin Airport's progress towards Net Zero 2050. The projects proposed below mainly aim to address a regulatory requirement, improve air/water quality or invest in renewable energy sources at the airport. We refer to the relevant regulations the project is intended to address, note any potential grant funding that may become available to Dublin Airport and where applicable highlight the operational savings the project is likely to generate.
- 1.2 CIP27 proposes three major decarbonisation initiatives that are intended to help Dublin Airport's in meeting its obligations under the Climate Action and Low Carbon Development (Amendment) Act, 2021 which mandates it to reduce its carbon emissions by 51% by 2030.

CIP27.01.01 - Terminal 2 and Pier 1 Renewable Heating

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€106m	30 years	StageGate	Y

*All allowances in this appendix are in nominal terms.

- 1.3 This project is a rollover from CIP2020+ (CIP.20.09.008) and intends to transition both T2 and Pier 1 from fossil fuels to a renewable heating source. The main deliverables of the project include a T2 heating system upgrade, Pier 1 plant room upgrades, deployment of geothermal wells within the campus land, a new energy centre and the use of biomethane/hydrogen for existing boilers and Combined Heat and Power (CHP) units.
- 1.4 The project is proposed to support Dublin Airport in reducing its scope 1 carbon emissions by 51% by 2030, as set out in the Climate Action and Low Carbon Development Act, and to aid in complying with a broad range of other mandates such as the Energy Efficiency Directive, Renewable Energy Directive (RED II and RED III) and the Effort Sharing Regulation.
- 1.5 We note that Dublin Airport may ultimately avail of grant funding of up to 60% of the final project costs under the Connecting Europe Facility (CEF) Alternative Fuels Infrastructure Facility (AFIF) programme to advance sustainable transport. When the final amount of funding is known, this will be reflected as a cost saving on the project.
- 1.6 We recognise the requirement to reduce carbon emissions and the significant contribution this project is expected to make towards achieving legally mandated emissions reductions, and the financial implications Dublin Airport would face should it not meet its targets. As the IFS recognises, there are still several scoping decisions to be taken on this project and as such we allow for it in the StageGate programme. Given the scale of this project and that it was not advanced through StageGate in the previous regulatory period, we are proposing to trigger the allowance for this project.
- 1.7 It is likely that the operational savings generated from this project will be mostly realised in the next regulatory period given that neither element is expected to be operational until the end of the period.

CIP27.01.02A – Charging Network

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€59.6m	15 years	StageGate	N

- 1.8 This is a rollover project from CIP2020+ (CIP.20.09.001). Dublin Airport has refined the scope of the original project through feasibility studies. This project provides for 80 Ground Support Equipment (GSE), 20 airside EV and 135 landside EV charging points and is proposed in conjunction with the broader MV/HV Network Expansion. These new charging points will be introduced across pier 1 east, south apron, airfield maintenance base, eastlands cargo, car hire, car parks, taxi rank and the west apron charging hub and will include the associated cabling, infrastructure and civil works.
- 1.9 As in 2022, we acknowledge the importance of transitioning to EV's and note that reliable charging infrastructure is key to facilitating this from the perspective of both Dublin Airport and third parties. The IFS has noted that the scope as currently presented is not sufficient to fully assess its efficiency. By including this project in the StageGate process, Dublin Airport will have opportunities to consult with users as it further develops the scope.

CIP27.01.02B – North Apron GSE charging Hub

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€35.5m	15 years	StageGate	Y

- 1.10 This project is also a rollover (CIP.20.09.001) which included an €8.8m allowance for the North Apron Charging Hub. This project provides for the development of the North Apron GSE Charging Hub. The hub will feature approximately 160 mix-sized charging spaces for various vehicle dimensions—small, medium, and large- for charging of GSE with 12kW output.
- 1.11 We asked Dublin Airport if it had considered alternative suitable locations for the charging infrastructure given the considerable risk of PFAS in the North Apron. It responded that while various locations were initially considered, it concluded that charging facilities are required in a location that is operationally suitable for the operators of both the north and south aprons, considering the journey to and from the apron. We note that an amount of €10.4m is estimated for this project under CIP27.02.50 which will be drawn down as part of the StageGate process.
- 1.12 As above, we acknowledge the importance of transitioning to EV's and note that reliable charging infrastructure is key to facilitating this from the perspective of both Dublin Airport and third parties. We agree with Dublin Airport that the allowance for this project should be triggered, and we include it in the StageGate process. For this project and for CIP27.01.02A we retain the asset life of 15 years we set for CIP20.09.001, although we note that Dublin Airport has proposed 20 years.

CIP27.01.03 – Solar PV and Energy Storage

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€142.45m	25 years	StageGate	Y

- 1.13 This project is a rollover from CIP.20.09.006. Two undelivered elements of this CIP2020+ scope are expected to be delivered in Q1 2028: PV Phase 2 and Battery Energy Storage System (BESS) at Stockhole Lane, Cloghran Stud Area and PV Phase 1 and BESS at R108. Following a feasibility study, the CIP27 version provides for a new solar farm with a capacity of 11MWp, installation of rooftop solar panels over a number of existing campus buildings with a combined capacity of 1.6MWp, and a new Battery Energy Storage System (BESS) with a capacity of 15MWh. The new rooftop solar panels will be located on the three existing car hire buildings, Gate Post 9, Gate Post 1B, T2 multistorey car park roof, and T1 8-bay roof, with other identified buildings included in campus building retrofit project. In addition, the project will deliver Solar PV installation through car portals installation over the existing Blue Car Park.
- 1.14 Dublin Airport is also proposing a wind renewable energy solution trial, by installation of micro generation devices, which are designed to capture turbulent ground-level winds. Integration with Dublin Airport's electrical network, Solar PV and battery storage installation will also be part of the trial. Dublin Airport expects this project to deliver substantial electricity over the regulatory period and to have significant cost savings in terms of Opex, which we have reflected in our Opex forecast as a reduction of €2.8m within the triggered allowance.
- 1.15 In 2022 and in 2019, we allowed for solar photovoltaic farm developments. We acknowledge the contribution that such developments can have in meeting legally mandated emissions reductions and supporting Dublin Airport in reducing carbon emissions. We again allow for this project as part of StageGate, noting the IFS' observations that there is a lack of evidence to support the efficiency of the project as the scope incorporates car park portal mounted solar panels which are known to be considerably more costly than roof mounted systems. Ongoing consultation with Users through StageGate will give Dublin Airport an opportunity to review the proposed scope elements.
- 1.16 We agree with Dublin Airport that the allowance for this project should be triggered. Ahead of the Final Determination, we will explore whether it is appropriate to set separate triggers for the individual components of the project, and we invite views in that regard. We also retain the asset life of 25 years which we set for the PV Farm projects in 2019 and 2022, as opposed to accepting the 20-year asset life proposed by Dublin Airport.

CIP27.01.04 – Mobility and Accessibility

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€6.9m	9 years	Flexible	N

- 1.17 This project proposes various accessibility enhancements to improve the overall passenger experience. Deliverables include upgrades to digital and IT equipment such as audio and tactile user interfaces for Flight Information Displays (FIDs), bus timetables, gates, piers, and bathrooms. Injection points at Piers 2, 3 and 4 will be upgraded with additional signage, replacement of seating and installation of hydration stations.
- 1.18 We have previously found projects similar to this to be in the interests of Users, and we again make an allowance for the proposed improvements here. We agree with Dublin Airport's proposed treatment of this project as Flexible.

CIP27.01.06A – Air Quality and Noise Monitoring

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€17.3m	23 years	Flexible	N
1.19	This project aims to improve the collection of empirical noise data for regulatory reporting, which can inform the development of dwelling purchase schemes. This project will add five more noise monitors to the existing five, a further two fixed noise monitors to the existing three, and will also involve the installation of acoustic earth berms will at the North Runway. The placement of the noise monitors is to be determined by ANCA.			
1.20	We acknowledge that Dublin Airport's noise mitigation measures are required by the Noise Action Plan and the wider requirement to meet the Noise Abatement Objective as set out by ANCA. The project also aligns with Dublin Airport's requirement to both monitor and report on air pollutant concentrations within the Dublin Airport environs.			
1.21	We consider that this project addresses multiple noise, air quality, pollution and related environmental regulations, including the Environmental Noise Directive, the Aircraft Noise Regulation, and the Ambient Air Quality Directive. We therefore allow for this project and agree with Dublin Airport's treatment of this project as Flexible.			

CIP27.01.06B – Noise Insulation Scheme

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€49.1m	15 years	StageGate	N
1.22	The primary objective of this project is to deliver noise insulation measures to eligible houses in the vicinity of Dublin Airport. As per the Coimisiún Pleanála (ACP) decision on the North Runway Relevant Action (NRRRA) issued in July 2025, up to 1,100 properties will be eligible under the Residential Sound Insulation Grant Scheme (RSIGS). The maximum grant offered under the scheme is €30,000. This project also includes biennial review performance upgrades following statutory reviews scheduled for 2026, 2028 and 2030, and a Schools Insulation Scheme (SIS).			
1.23	Dublin Airport has proposed that this project is designated as Deliverable. However, we consider that, given the proposed cost of the project, the high level of uncertainty including: the ACP NRRRA decision not yet being fully legal operative, the possibility that different insulation may ultimately be needed to meet the current NAO targets and/or new NAO targets, and the likelihood that instrument flight procedures will need to be reviewed (whether with a view to addressing specific issues identified and/or as part of the standard IFP 5-yearly review cycle), we consider that this project is better suited to the StageGate process. This will allow Dublin Airport to consult with Users as the scheme progresses and the requirements surrounding NAO targets become clearer or develop further.			
1.24	We acknowledge the importance of noise insulation schemes to the wider Dublin Airport community. We have previously allowed for the cost of such schemes in the North Runway project. However, as the IFS has also concluded, we do not consider it efficient to allow <i>ex-ante</i> for the costs of a 100% take up rate of the scheme. As acknowledged by Dublin Airport, that is not a centreline assumption. As set out in the draft IFS report, we allow for the cost of 990 RSIGS grants provided instead of the 1,100 assumed by Dublin Airport and			

we include the project in StageGate. The allowance can be adjusted up or down as needed depending on uptake, through the StageGate process.

- 1.25 We also consider that the 5-year asset life as proposed by Dublin Airport is too short and agree with the IFS that an asset life of 15 years is more appropriate. While Dublin Airport suggests that an asset life shorter than the expected life of the assets is appropriate because Dublin Airport will not own/manage the assets and the cost to Dublin Airport will be incurred during the CIP27 period, these are not reasons to set a shorter asset life for the purposes of the determination. Airport Users will continue to benefit from these assets over their useful life, as a noise mitigation measure aimed at reducing the impact of their operations on residential amenity.

CIP27.01.07 – Biodiversity and Natural Habitat Restoration

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€19.2m	50 years	Deliverable	N

- 1.26 Dublin Airport is proposing a habitat replacement which includes the development of a Biodiversity Enhancement Plan. The plan will identify eligible sites on a phased basis to achieve biodiversity net gain. This project is being proposed as many of the existing green and brownfield sites at the airport will be developed into aprons, taxiways, aircraft stands and commercial properties, such as car parks.
- 1.27 Dublin Airport is proposing to include approximately 40% of the total estimated habitat lost due to the CIP27 development in the biodiversity development. We understand this is a first phase of the habitat restoration programme, with next phases continuing in the next regulatory periods. The phases will be guided by Dublin Airport's Biodiversity Action Plan which it will submit to Fingal County Council (FCC).
- 1.28 We understand that Dublin Airport's ability to carry out biodiversity impact assessments and demonstrate Biodiversity Net Gain (BNG) has been a key requirement of recent major planning applications including, the North Runway, North Apron Airside Support, T1 Rank Enclosure, South Apron Animal Welfare and Cargo Redevelopment Project. We agree with the IFS that Dublin Airport should conduct a site selection process which includes the necessary surveys and assessments at the beginning of the project. We understand from Dublin Airport that a pilot biodiversity scheme is currently underway, the results of which will be used in the final design of this project.
- 1.29 Given the alignment of such works with various national and EU policies which aim to protect natural habitats as outlined in the Issues Paper, as well as the importance to the success of future planning applications, we agree with Dublin Airport's efforts to demonstrate Biodiversity Net Gain (BNG). We propose to make this project a Deliverable, with reference to the first three criteria set out at paragraph 9.31 of the Issues Paper.

CIP27.01.08 – Campus Building Sustainability Retrofits

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€18.7m	20 years	Flexible	N

- 1.30 This project is proposing to retrofit 7 buildings across the airport campus in order to improve their energy performance and rating. The buildings in scope are Cloghran House,

Landside Maintenance Base, Cargo 6, Cargo 4 unit 1, Skybridge/TASC building, Airfield Maintenance Base and Fire Station. The scope of works includes the installation of alternative renewable technology (heat pumps and solar PV), systems controls, boiler upgrades and heat recovery with insulation and windows upgrades where applicable.

- 1.31 Dublin Airport has recently secured the CEF AFIF funding for the DACE – (Dublin Airport Campus Electrification). While it is currently developing a pipeline of funds to match up with the planned projects, this process has not yet been finalised but there is a possibility that some grant funding will be assigned to this project, in which case it will be reflected as a cost saving.
- 1.32 We recognise the requirement to reduce carbon emissions and the significant contribution this project is expected to make towards achieving legally mandated emissions reductions. We allow for this project and agree with Dublin Airport that it should be included as Flexible.

CIP27.01.10 – Landside Surface Water Compliance

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€24.8m	47 years	StageGate	N

- 1.33 This project is part of Dublin Airport's Drainage Masterplan, which covers both surface and foul water for future expansion. The surface water management system will include new network collection and conveyance, as well upgrade works to the existing infrastructure. This proposal focuses on the assessment of existing network and attenuation storage for future developments in the eastern campus area.
- 1.34 We have previously allowed for similar drainage projects, such as the CIP20.03.052 Surface Water Environmental Compliance project, which addresses airfield drainage. This project is focussed on landside drainage, mostly within the horseshoe. We acknowledge this project has a role in facilitating the expansion of landside facilities, such as Pier 1 East, The Integrated Transport Hub and various car parks. Dublin Airport has provided an EPA report which shows that the River Mayne (Cuckoo Stream), Sluice and Santry reiver are below 'good' status. We therefore also assess that the project will support Dublin Airport in meeting regulatory requirements under the EU Water Framework Directive.
- 1.35 The IFS has noted that the information provided to date has been insufficient to fully assess scope and cost efficiency. Therefore, we agree with Dublin Airport to include this project in the StageGate process to allow for further consultation as the scope is refined following the feasibility/asset condition survey. We are proposing a longer asset life than Dublin Airport. We have estimated a weighted average asset based on the various components, which includes long-life buried infrastructure such as drainage equipment.

CIP27.01.11 – Legacy PFAS Mitigation and Remediation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€172.9m	20 years	StageGate	N

- 1.36 This project expands upon Dublin Airports existing PFAS (perfluoroalkyl or polyfluoroalkyl substance) mitigation programme and includes provision for a waterbodies survey, development of an environmental data management software tool, and a detailed

Quantitative Risk Assessment. This project will deal with existing PFAS in known locations on the airport campus and will require mitigation even if there is no new infrastructure development in these areas.

- 1.37 We acknowledge the presence of PFAS at Dublin Airport and the significant costs associated with its removal/disposal at affected sites. The costs of several StageGate projects in CIP2020+ increased due to the presence of PFAS. We agree with the approach of Dublin Airport to now have one project dedicated to the remediation and mitigation of PFAS at known affected sites. It is in the long-term interest of Users if Dublin Airport can improve its handling of PFAS, establish an effective monitoring regime and develop an effective strategy to treat the substances. We also acknowledge that the regulation of PFAS is a priority under the EU's Chemicals Strategy for Sustainability. Due to the early stage of the project and the uncertainty of the scope, we agree with Dublin Airport and the IFS that this project should be included in StageGate.

2. Airport Development

CIP27.27.02.02A – Pier 1 East

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€673.1m	32 years	StageGate	Y

*Excluding associated retail/security projects

- 2.1 This project is a part rollover from CIP20.03.036. The original scope of CIP20.03.036 was solely for the first phase or Module 1 of the ultimate Pier 1 East extension, while the subsequent intention to develop Module 2 and Module 3 was also set out. CIP27.02.02A includes the full development of Pier 1 East, including Modules 2 and 3, along with the associated stands and apron infrastructure.
- 2.2 The project provides for 14 contact gates served by 7 new fixed links, with 6 bussing gates. Pier 1 East will have an overall provision of 14 NBE stands. It will be a three-storey structure consisting of retail, food and beverage options, and general seating on the first floor, and a new airline lounge and a roof garden terrace on the second floor. There will be contact gates on the first floor and bus gates at the apron level.
- 2.3 Ryanair rejects the project at the proposed cost, stating that it is over scoped. It states that the proposed development is largely unnecessary given that 75% of T1 traffic is from low-cost airlines. Ryanair believes the project needs to be a simplified low-cost pier with no airbridges, fixed links, or airline lounge. Ryanair states that fixed links and airbridges significantly reduce efficiency, increasing turnaround times and not facilitating rear door access. Ryanair also disputes Dublin Airport's claim that airbridges will support compliance with PRM assistance obligations.
- 2.4 Dublin Airport states that all airlines will be mandated to use the fixed links, but the use of airbridges will remain an airline choice. The fixed links on Pier 1 East will also provide future resilience and capacity for Pier 2 / 3 airlines during construction of these piers. Dublin Airport references the strong support from the Passenger Advisory Group for fixed links as essential to improving accessibility, comfort, and overall passenger experience. We also note strong support from Lufthansa for the installation of airbridges in Terminal 1.
- 2.5 Skylark (on behalf of Aer Lingus) states that the addition of Modules 2 and 3 represents a change in the project, not a refinement of an agreed concept and that the IAA and IFS should require Dublin Airport to treat Modules 2 and 3 as effectively new projects requiring standalone needs cases and capacity justification. It states that the scope-change element should be subject to full StageGate scrutiny, with cost benchmarks verified against comparable pier developments in the Irish and UK markets. Skylark questions whether the 2035 delivery date also raises the question of whether some costs should be deferred to the 2032–36 period.
- 2.6 We note that Dublin Airport can progress with Module 1 independently of Modules 2/3. Dublin Airport has outlined that its current strategy is to progress the Mod 1 design and if/when planning permission is granted, to progress with the Mod 1 construction as soon as possible (aspiration 2029). It is proposed to submit planning for Mod 2/3 within the regulatory period and begin construction when planning permission is granted. Delayed planning for Mod 2 /3 will have no impact on current Mod 1 design.

- 2.7 We note there is conflicting assertions from Ryanair and Dublin Airport about the efficiency of fixed links and airbridges. We note the IFS considers the scope of this project as presented by Dublin Airport to be efficient and it states, "*The stand configuration makes the best use of the limited stand depth available by orientating the WB aircraft efficiently*". We acknowledge support from Ryanair to increase the capacity of Pier 1 though it does not support the cost of the solution proposed by Dublin Airport.
- 2.8 In terms of the merit of the design including airbridges, we note the contrasting views between Ryanair, on the one hand, and Dublin Airport, Lufthansa, and the PAG on the other. We do not propose to amend the cost assumptions as suggested by Ryanair and note that the airbridges makes up just 5% of Dublin Airport's total proposed cost for the Pier 1 East development. We think that such multifunctional facilities provide a flexibility and future-proofing which is in the interests of Users more broadly. While acknowledging that Ryanair is the primary user of Pier 1, we continue to think that it would be disproportionate to make such an adjustment.
- 2.9 We note that Dublin Airport already differentiates charges on the basis of airbridge use. Where that differentiation is cost-related, then the existence or otherwise of airbridges would be cost neutral for Ryanair. We also disagree with Ryanair's criticism of the additional commercial features such as lounges. Those facilities provide services for which there is passenger demand, and generate commercial revenues which enhance the value proposition for Users.
- 2.10 We note in response to the CIP2020+ version of this project, Ryanair supported Module 1 project but expressed a preference for the Module 2 project to also be included, to ensure an acceptable level of contact stand service is provided. The previous project was always premised as the first step of the new pier, with the further modules to be added subsequently. The design of the project has since been developed to include both Modules 2 and 3. This project is a key element of the additional capacity simulated in the Fast Time Simulation analysis and servicing the future demand.
- 2.11 We note concern from Skylark regarding the addition of Modules 2 &3 to the scope. In response to the Skylark submission, the IFS has undertaken a full review of the CIP27 project as presented including benchmarking the relevant rates with developments in the Irish and UK markets.
- 2.12 We also acknowledge that there is a planning related implication of including Modules 2 and 3, as Module 1 is included in the Infrastructure Application and Modules 2 and 3 will require its own separate submission. To address this, for the Final Determination, we could split the project into two separate triggered amounts, the first in relation to Mod 1 and the second in relation to Mod 2 and Mod 3. Dublin Airport has confirmed that Mod 1 can progress independently of Mod 2/3 should the Infrastructure Application be approved. Within the respective trigger amounts, we also include the cost of the commercial units (CIP27.03.10A ARI Retail Projects) and the lounge (CIP27.03.04 Airline Lounges).
- 2.13 We agree with Dublin Airport to include the project in StageGate. However, we are proposing an asset life of 32 years which is longer than its proposed 25 years. As noted by the IFS, this is aligned to the CIP2020+ iteration of Pier 1 East. While Aer Lingus and IATA have suggested that permanent concrete structures should have an asset life of around 40-years, the project also includes MEP systems, aeronautical equipment and interior finishes which have lower asset lives. The proposed asset life reflects the useful life of each subcomponent.

CIP27.27.02.02B – MRO relocation and facilities

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€154.5m	25 years	StageGate	Y

*Not including security elements linked to this project.

- 2.14 The Maintenance Repair Overhaul (MRO) hangars demolition and relocation works were also included in CIP20.03.036. This now-standalone project proposes to demolish hangars 3, 4 and 5 in order to deliver Pier 1 East (CIP27.02.02A). The scope of the project includes enabling works for new hangars at an alternate site in the west of the airfield. The project also provides for the construction of a new link taxiway and access apron covering approximately 28,000 sqm. Dublin Airport states that hangars 1,2 and 3 must be demolished to facilitate Mod 1 of Pier 1 East, and hangars 4 and 5 will be demolished to facilitate the construction of Mod 2/3.
- 2.15 Dublin Airport has provided an options report which included three options for the relocation of MRO, and the prospect of a do-nothing case. The options considered were 1) Southwest of the Runway 10L threshold, 2) North of the Runway 10R threshold (east of option 2), 3) North of the Runway 10R Threshold (east of Option 2). Ultimately, option 2 was chosen because it is further from runway centrelines and outside air traffic control sight line constraints. The do-nothing case would block the development of Pier 1 East, or alternatively require removal of MRO operations from the airport campus.
- 2.16 Dublin Airport has identified windshear, sightlines from the control tower, impact of the hangar on equipment (such as ground movement radar) and operations during Low Visibility Procedures (LVP) as issues requiring further review as part of its risk assessment at the chosen location. Dublin Airport states that it is engaged in ongoing discussions with both airlines and MRO service providers. The site requirements of the MRO service providers were incorporated into functional design briefs and will form part of a planning application to be submitted by the end of 2026.
- 2.17 We note that the 2015 National Aviation Policy (NAP) commits to maintaining and building Ireland's attractiveness as a base for MRO activities. We consider that allowing for this project is therefore aligned with the NAP. We also think that retaining MRO services on-site is in the interests of Users. Given the scale of the proposed project and its interdependency with the delivery of Pier 1 East, we agree with Dublin Airport that this should be included in the StageGate process. We also agree with Dublin Airport to make this a trigger project. The trigger amount includes the cost of security equipment for the new MRO Gatepost (from CIP27.05.05, Security Operations Systems and Equipment).

CIP27.02.02.04 – Terminal 2 CBP and Transfer Extension

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€150.7m	25 years	StageGate	Y

- 2.18 This project was previously proposed under CIP.20.03.030. The project scope now includes an expanded transfer immigration checkpoint which has been added to the second floor. The project will require the demolition of two existing Pier 4 fixed link bridges, and MARS stand 409. This will allow for the construction of a three-storey building. The ground floor design is currently based on accommodating five 19 metre TSA lanes and 22 CBP booths.

The first floor will accommodate an airline lounge, retail units, and wait for gate seating areas. The second floor will accommodate a new transfer facility which will include 8 immigration booths, 10 e-gates with associated queue space, offices, transfer ticket desks, toilets, and plant rooms. The current Pier 4 transfer facility is proposed to be moved to the second floor of the CBP extension facility.

2.19 Dublin Airport considered three options for this project. These were:

1. Pier 4 CBP Extension – Southern Side
2. Pier 4 CBP Extension – Northern Side
3. Multi-Level Terminal 2 extension

2.20 Option 1 was identified as the preferred choice. Dublin Airport assesses it to be the best value for money, the lowest overall risk as it avoids complex crossovers at Pier 4 and finds it to be in the optimal location to provide CBP to Piers 4 and 5, the primary CBP-enabled piers.

2.21 In its assessment of the project, the IFS finds that there may be a challenge in terms of the passenger flow for Pier 5 departures and that transfer passengers arriving from Pier 5 could easily miss the small transfer access door before proceeding with the arrivals flow through anti-return gates towards T2. The IFS finds that the incorporation of too many different functions into a limited space might lead to inefficiencies.

2.22 In the Fast Time Simulation (FTS) analysis, To70 finds that *“The new TSA-CBP area has enough space and passenger processors to provide an adequate level of service, as both time and space metrics stay at acceptable levels”* it also concludes that *“The addition of numerous CBP processors results in a rather efficient operation at this area”*.

2.23 As in 2022, we note the continued support of some Users for this project. The current US Preclearance facilities require additional capacity to facilitate expected growth in US traffic at optimal times, and the To70 analysis shows the benefit which this facility could provide in that regard. We propose to continue to allow for this project, and have proposed it as a trigger project which will be included in StageGate. The total triggered amount is inclusive of certain elements which Dublin Airport has included within other project allowances but which are actually linked to this project, including some new commercial units (CIP27.03.10A ARI Retail Projects), the lounge on the first floor (CIP27.03.04 Airline Lounges) and the security equipment (CIP27.05.05 Security Operations Systems and Equipment).

2.24 The StageGate process will afford Dublin Airport the opportunity to further develop the scope elements as appropriate, while continuing to engage with Users. We note that Dublin Airport has received planning permission for the construction of the two-storey facility but not the third floor. It states that if the planning is delayed or rejected for the three-storey amendment, it will progress with the two-storey scheme. In this instance the Pier 4 transfer facility will remain unaffected and will continue to operate as it does today. Ahead of the Final Determination we may consider whether to have two separate triggers for this project: for i) the two-storey building and ii) the third floor, and we invite views on that point.

2.25 We expect this project to generate incremental annual Opex of c€1.3m (including additional cleaning and retail costs) and incremental retail revenues of c€1m. We include these amounts within the triggered allowances.

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€443.1m	25 years	StageGate	Y
2.26	This major project is a rollover from CIP.20.03.029. This standalone Pier 5 project now proposes a single sided, linear pier that extends from T2. It will consist of three stories and also feature six new narrowbody bus gates equipped with dedicated bus bays at the apron level along with washroom facilities, F&B, retail space, and gates at apron level reserved for non CBP departures. Distinct from its approach in CIP2020+, Dublin Airport has submitted the Eastlands Cargo enabling works and the re-location of Gate Post 4 in separate discrete projects in CIP27.			
2.27	Pier 5 will provide 8 narrowbody gates at 1st floor level which can be combined to provide 4 widebody gates, linked to aircraft stands by fixed links and airbridges. Each fixed link will also have open access for walkout operations and access to the second-floor arrivals route for deplaning passengers. Due to the demolition of Gate 409, the number of net narrowbody gates added by Pier 5 will be 6 (3 WB). The apron level will provide 6 new narrowbody remote hold rooms serving aircraft movements from remote aprons. As noted below, CIP27.02.05B will deliver the apron area necessary to enable the use of Pier 5. Dublin Airport has outlined that if the South Apron expansion is delivered ahead of Pier 5 then it can be operated remotely in the interim, providing additional capacity through 3 to 5 remote stands.			
2.28	We acknowledge submissions from Aer Lingus, IATA and Skylark who consider an asset life of 25 years to be too short for the Pier 5 development. We note that in the 2022 Review Decision, the corresponding project CIP.20.03.029 had an asset life of 28 years. However, the longer asset life was mostly driven by the Eastlands Cargo development which is now presented separately under CIP27.02.06. In its analysis, the IFS agrees that a permanent concrete and steel structure would have an asset life in the region of 40 years but that the other elements of this project including MEP systems, aeronautical equipment and interior finishes will have lower asset lives. The proposed asset life of 25 years is a result of the individual components and their differing useful lives.			
2.29	In the FTS analysis, To70 finds that <i>“Even if the CIP (traffic) schedule does not materialise as expected, those extra stands at Pier 5 will provide a valuable space that can be used to limit the amount of towing in the southern parts of the airport”</i> . To70 also caveats however that if the Pier 5 stands are <i>“occupied by new wide-body operations, (they) may not provide additional resilience to handle the anticipated 10% increase in aircraft movements (compared to Summer 2026 levels)”</i> . The To70 analysis suggests that the Pier 5 development will provide valuable additional multifunctional stand and gate capacity.			
2.30	In the 2022 Draft Decision, we concluded that this project is a key part of the development of the south apron as a secondary hub, which is in line with the NAP. This project is directly addressing the current shortage of contact stands, in the interests of Users.			
2.31	As in 2022 we allow for this project in the StageGate process and intend to again make it a trigger project. Similar to Pier 1 East and the CBP extension, the total trigger amount is inclusive of new commercial units which are in practice part of this project (within CIP27.03.10A ARI Retail Projects).			

CIP27.02.02.05B – South Apron Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€225.7m	34 years	StageGate	Y

- 2.32 This project is a rollover from CIP.20.03.031. It involves the re-design and expansion of the South Apron to facilitate the use of Pier 5, including the associated new aircraft stands, enablement works and a dual code E parallel taxiway, linking to taxiways R and V. The expansion will deliver 4 widebody MARS contact stands accommodating 4 widebody aircraft or 8 narrowbody aircraft at Pier 5. Dublin Airport intends that the Code C south apron stands will be wholly unrestricted in terms of use by Code C aircraft. The expansion of the apron requires the diversion of the nearby cuckoo stream and associated pollution control monitoring infrastructure.
- 2.33 Similar to the Pier 5 project, we continue to allow for this project, which aligns with the 2015 NAP objective of developing the airport as a secondary hub, and aligns with the interests of Users in providing necessary capacity. We note the IFS has raised some concerns over the volume of airfield pavement rehabilitation. We agree with the IFS that as the project enters detailed development, Dublin Airport will be required to demonstrate that it is pursuing the most efficient use of existing pavements. Including this project in the StageGate programme will facilitate this ongoing consultation. We also agree with Dublin Airport to trigger the allowance for this project.

CIP27.02.06- Cargo Relocation (Eastlands)

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€104.8m	50 years	StageGate	Y

- 2.34 This project was previously included as part of CIP20.03.029. This now-standalone project provides for the enablement of a site to support the future expansion of cargo handling facilities to the east of the Dublin Airport boundary. Dublin Airport states that a secure bonded road and bridge will provide airside access from the cargo base which will be located to the east of the R132 road. Landside access will be provided through a new entrance and exit on the R132. The scope also includes the relocation of non-commercial state agencies such as border inspection, customs, and revenue which will be repurposed into a single warehouse in the new development area. Distinct from the CIP2020+ version of this proposal, the project scope does not now include new cargo warehouses, just the necessary access and enabling infrastructure (three to four warehouses will be facilitated).
- 2.35 Dublin Airport identified and considered four options which were assessed against the airport's long term development plans, stakeholder preferences, scalability, and operational impact. The four options included Corballis Park, area of ALSAA Sports Centre, Westlands and Eastlands. The Eastlands location was chosen on the basis that i) it exceeds the required area size, hence safeguarding for the future cargo expansion, ii) it involves relatively straightforward construction, iii) has minimal operational impact during the delivery works, and iv) enables continuity of operation in the East Campus via bond road and access bridge.
- 2.36 We note there has been significant feedback from stakeholders, in particular from cargo operators, in relation to this project. The main arguments are summarised as follows:

- Aer Lingus, IAG, IAG Cargo and Worldwide Flight Services believe that Dublin Airport's approach to cargo infrastructure falls short of both Government policy, and the needs of the Irish economy. They state that the National Aviation Policy (NAP) and the National Air Transport Facilitation Programme (NATFP) explicitly recognise the critical role of air cargo in supporting Ireland's export competitiveness and, as such, Dublin Airport should by now have developed and published a clear dedicated cargo strategy.
- IAG Cargo and Worldwide Flight Services believe that Dublin Airport should fully fund the relocation of cargo warehouses ensuring the cargo infrastructure is fit for purpose and aligned with Government policy, and the needs of the wider economy. Both state that the planned cargo development falls far short of their expectations for facilities that can meet the requirements as set out in the NAP and NATFP and EU Ground Handling Directive.
- Ryanair questions how the project has ended up landside, necessitating a bridge over the main airport access road and how Dublin Airport can now justify the west apron underpass project given that it was initially supported by cargo operators who will now be operating out of the eastlands.

2.37 We acknowledge the concerns from cargo operators and from Ryanair around the current cargo warehouse proposal. We encourage Dublin Airport to work with cargo operators as the project design is developed. We intend to allow for this project in the StageGate process which will afford Dublin Airport the flexibility to accommodate any changes to its current proposal through ongoing consultation with Users.

2.38 We propose to again allow for this project. We note that the Programme for Government 2025, *Securing Ireland's Future*, recognises air cargo as a strategic priority for Ireland's connectivity, trade and economic resilience and that the National Air Transport Facilitation Programme (NATFP) aims to ensure that *"the movement of passengers, crew, aircraft and cargo is conducted in an efficient, secure, and passenger-focused manner, in line with international obligations and national legislation"*.¹

2.39 We received submissions from IATA and Skylark suggesting that the asset life should be longer than Dublin Airport's proposed 25 years. The IFS has suggested that an asset life of 50 years is reasonable. We are therefore proposing a 50-year asset life instead. We also agree with Dublin Airport to include the cargo development as a trigger project.

CIP27.02.02.07 – Gate Post 4 Relocation

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€19.8m	20 years	StageGate	Y

*Excluding the security element of this project, which has been included in the triggered allowance.

2.40 The scope of this project was also previously included as part of the Pier 5 (CIP.20.03.029) project. The expansion of the south apron outlined above, including the development of Pier 5, necessitates the demolition of the existing Gate Post 4. This project will relocate Gate Post 4 to the current site of an existing cargo building. The new Gate Post 4 will be a two-storey building with vehicle screening lanes, access roads, adjacent security fences and staff welfare and administrative facilities. In total the project will deliver 5 vehicle security lanes: 2 incoming lanes to the north of the gate post will serve incoming landside traffic, with 1 additional outgoing lane, 2 lanes to the south will serve incoming and outgoing traffic via bonded road to the Eastlands Cargo.

¹ https://assets.gov.ie/static/documents/516bcb8a/20251218_National_Air_Transport_Facilitation_Programme_2026-2029.pdf

- 2.41 We note that Ryanair has criticised the cost of this project, as it sees it as being additional to the Pier 5 project, having previously been included in the Pier 5 costs. We find this is not the case as Dublin Airport has split sub-elements of the CIP2020+ project into individual CIP27 projects, now including also the separate project for the Cargo Eastlands project. The IFS has assessed each project cost plan for double counting and has not identified any here.
- 2.42 As Gate Post 4 will be an enabler of the south apron expansion, we find it also has a role in meeting the 2015 NAP objective of growing the south apron as a secondary hub. Dublin Airport has proposed that this allowance is Flexible and included it as a trigger project. Given the project's interdependency with wider south apron developments, we agree that it should be triggered. However, it is not possible for a triggered project to be given Flexible regulatory treatment. In this case we propose to allow for the project but include it in the StageGate process. As outlined for other projects above, the Gate Post 4 trigger amount will be inclusive of the cost of security equipment (CIP27.05.05 - Security Operations Systems and Equipment).

CIP27.02.08 Wide Body Engine Test Facility

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€21.1m	25 years	StageGate	Y

- 2.43 This project is a rollover from CIP.20.03.079, with no substantive changes in scope. We allowed for this project in 2022, noting that replacing this facility was in the interests of Users who operate widebody aircraft, as the previous arrangement of engine testing on operational runways or taxiways would no longer be possible once the North Runway was in use. Dublin Airport has indicated that Runway 16/34 is now used as one of the primary north-south taxiway routes which necessitates an alternative location for wide-body engine testing. This project proposes to increase the existing ETS1 facility to enable full-power engine testing that can accommodate aircraft up to the size of a Boeing 777 and allow access from Taxiway S.
- 2.44 The project will include 16,000 sqm of new pavement and taxiway interface works, taxiway fillets to facilitate optimal aircraft routing to and from the facility and a new 235m jet blast fence around the northern perimeter of the testing site to protect the taxiways behind. The IFS finds the project scope and specifications of this project to be at a very high level.
- 2.45 Ryanair opposes this project, stating that power testing is permitted on stand. In response, Dublin Airport confirms that while short interval and minor low power testing is permitted on the stand and at several designated locations, if prolonged and higher power testing is required, it must be conducted in a safe area away from primary operations. Dublin Airport has also confirmed that the blast fencing has been assessed in the current design and will not penetrate the OLS of either runway. Neither, according to Dublin Airport, does the proposed HML (lighting) pose an OLS impact. While this will be subject to assessment in due course, at this stage we find Dublin Airport's response to queries raised on this project satisfactory and, as in 2022, we consider it to be in the interests of Users who operate code E aircraft.
- 2.46 As the IFS has highlighted, the scope of the project remains largely uncertain, and we therefore propose to allow for it in the StageGate process. We agree with Dublin Airport to include it as a trigger project.

CIP27.02.09/10 North/South Apron De-icing storage

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€15.3m	20 years	Flexible	N
2.47	This project is a rollover from CIP.20.03.076. The CIP2020+ project aimed to produce a feasibility study in respect of a consolidated de-icing strategy, which has now been carried out. Dublin Airport suggests that the complexity of the project has increased. While on-stand de-icing remains the preferred approach, the objective of this project is to provide de-icing fluid storage facilities on the North and South aprons to address the demand on de-icing infrastructure in winter.			
2.48	All existing tanks require either demolition or relocation to facilitate the construction of Pier 1 East and to support the South Apron Hub development. The North Apron de-icing facility will be located on the existing pavement of Apron 5H GSE parking and will feature seven bunded storage tanks (35,000L capacity each) and a water and mixing tank. The new South Apron facility will be situated on new pavement next to the South Apron GSE parking area and will also include 7 bunded storage tanks of 35,000L each and a water and mixing tank.			
2.49	Ryanair remarks that <i>"that it shouldn't have taken a €1.3m feasibility study for daa to determine that additional de-icing storage is required"</i> . While the full allowance of CIP.20.03.076 was €1.3m, Dublin Airport has spent less than that on the feasibility study, which is the amount that will actually enter the 2027 opening RAB.			
2.50	We allowed for this project in 2022, noting it would support the passenger experience, particularly during severe weather events and acknowledged the support it received from some Users. We note continued support from such Users. We continue to allow for the project and categorise it as Flexible.			

CIP27.02.011 - Fuel Hydrant Network

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€89.5m	30 years	StageGate	N
2.51	This project is a rollover from CIP.20.03.075, under which works on the eastern end of Pier 1 have begun and further works relating to Pier 3 and the West Apron Underpass are ongoing. This project primarily focuses on expanding the supply network and installing hydrant pits at stands that are not included in larger parent projects. Pier 1 East, Pier 5, and the South Apron PBZ already assume hydrant enablement as standard.			
2.52	There is provision for the expansion of the existing dual trunk main to accommodate the installation of hydrants around the North Apron, Triangle, and Pier 2. 24 fuel hydrant-enabled stands are proposed to be installed during the CIP period, with the precise number of hydrant pits and connections contingent upon the configurations of the stands. Dublin Airport intends to deliver the programme of works in two phases: approximately half will be delivered initially, and the other half will be delivered in the next CIP. The first phase is expected to be operational in 2032 and the second phase in the mid/late 2030s.			
2.53	The project is currently at conceptual design and is subject to an initial detailed feasibility			

study as to determine the exact requirements and scalability of the existing pumping system. Given the high level information provided on this project, the IFS has not been able to comment in detail on efficiency. Consequently, we consider it appropriate to include this project in the StageGate process to allow for further consultation with users when the design of the project is more advanced and more cost information is available.

- 2.54 In 2022, we acknowledged support from Users for this project, and stated that the provision of fuel hydrants instead of existing tanker arrangements would allow for a more environmentally friendly, fast, and reliable method of refuelling and reduce the number of vehicles on the apron. We continue to allow for this project.
- 2.55 Although the CIP2020+ version of the project had an asset life of 20 years, we consider that this project is delivering long-lived buried infrastructure meaning that the asset life should be longer than 20 years. We agree with the IFS' proposed asset life of 30 years.

CIP27.02.012 – MV/HV Network Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€389.7m	25 years	StageGate	Y

- 2.56 This project is a rollover from CIP.20.07.035. It provides for a) an extension to the existing Dardistown HV/MV substation to enable a "hot standby" b) approximately 250 km of new MV distribution network ducting and cabling across the east and west campus c) 86 new MV/LV substations and modification of 26 existing substations and d) feasibility and strategy studies to assess current capacity, future demand, asset condition and optimal infrastructure requirements.²
- 2.57 The CIP2020+ version of the project provided for the feasibility study and an MV Resilience Substation "cold standby" at Dublin Airport, which is a result of Dublin Airport's MV Masterplan. This project included a full MV system asset review and considered known and anticipated MV growth to 2040 & 55mppa. This project is expected to be delivered in 2029, subject to planning permission.
- 2.58 We asked Dublin Airport how the newly proposed strategic and feasibility analysis build on the previous study and why an additional study is now deemed necessary. Dublin Airport stated that the analysis is required to assess the current network capacity, the lifespan of assets, anticipated future demands, and the optimal infrastructure needs and locations in accordance with CIP27 and forthcoming development initiatives. This study will incorporate collaboration and insights from external energy providers, while also considering on-site renewable energy generation.
- 2.59 In relation to our allowance for this project in 2022, we noted that the ICAO Aerodrome Design Manual- Part 5 (Electrical Systems) recommends that *"for major airports, it is desirable to have at least two independent incoming power sources coming from widely separated sections of the electricity network beyond the aerodrome"*.
- 2.60 The IFS assesses that this project and CIP27.01.03 Solar PV and Energy Storage are intrinsically linked, and coordination will be essential to ensure the necessary power will be available to the airport. In response to our queries on ESB Networks' ability to make the

² Hot standby and cold standby refer to the state of the backup supply source and how quickly it can take over if the primary supply fails. A cold standby source is disconnected during normal operation whereas a hot standby source is ready for immediate use, although it is not normally carrying load.

necessary amount of power available to the airport, Dublin Airport responds that ESNB has indicated that it will be at least 15 years until there is sufficient grid capacity to meet the airport's future load development and thus Dublin Airport needs to address this with PV, BESS and prime load generation for peak demand management.

- 2.61 The IFS notes that Dublin Airport should consider the implications of the Private Wires Act 2026 for the transmission of private electricity which it believes could open new and more efficient methods of supplying additional power and resilience.³ Given the scale and multi-phase nature of this project, we consider that this project should be included in the StageGate process. We also make this a trigger project.
- 2.62 Dublin Airport proposed an asset life of 25 years. While we have estimated a weighted asset life based on the various components of the cost plan, we arrive at an asset life equal to that proposed by Dublin Airport.

CIP27.02.13 – Junctions Upgrade

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€26.4m	20 years	D	N

- 2.63 This project is proposed to improve junctions surrounding the airport such as the J1 Airport Roundabout Junction, J2 R132/ Corballis Road South, J3 R132/ Old Airport Road, J4 R108/Old Airport Road, and J5 Recirculation.
- 2.64 Dublin Airport states this is required to optimise the existing junctions for the efficient operation of public transport corridors, with the objective to shorten the journey time for buses travelling to and from the airport, whilst maintaining or improving pedestrian and cyclist infrastructure. Dublin Airport notes that the majority of the junctions are on daa lands, but where this is not the case, Fingal County Council (FCC) has provided permission, as landowner, to include the junctions in the Infrastructure Application. The project will be entirely funded by Dublin Airport even though some works will be carried out on public roads albeit in the vicinity of the airport.
- 2.65 According to Dublin Airport, the works are a critical component of its Infrastructure Application, as FCC has identified traffic bottlenecks that must be addressed by Dublin Airport. We propose to allow for this project but make it a Deliverable, with reference to the first three criteria set out at paragraph 9.31 of the Issues Paper.

CIP27.02.14 – Integrated Transport Hub

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€140m	25 years	StageGate	Y

- 2.66 This project aims to consolidate bus and coach facilities into a single location, redesigning the current bus area to enhance capacity and operational efficiency. It will feature a new plaza area and a link bridge to facilitate access and connectivity between the new station and both terminals. It will provide seating areas and facilitate a safe passenger journey from transport modes through the terminals. The hub will also provide information displays to provide passengers with updates about their journey. The two-storey building will become

³ Annex I - General Scheme - Private Wires Bill 2025 Amendments to Electricity Regulation Act 1999.pdf

the new bus station, connected to the Atrium via Link Bridge while the bus apron will accommodate up to 24 buses and 5 minibuses with the local bus stand area providing for up to 8 bus stands. The short-term layover will provide for up to 13 bus bays.

- 2.67 Dublin Airport anticipates a commercial revenue stream of approximately €5m per year arising from this investment, including from bus and coach licensing concessions, food and beverage and retail fitouts. We do not expect such commercial revenues to be realised in this regulatory period (as the project will not be completed) and as a result we do not include any associated uplifts in our commercial revenue forecasts.
- 2.68 In the CIP27 submission, Dublin Airport states that several respondents raised concerns regarding scale, cost, deliverability, and the appropriateness of progressing such a complex project within the current regulatory period. We note strong opposition from Ryanair for the scale of the proposed development.
- 2.69 We understand that this project has been developed in response to feedback Dublin Airport received to its Infrastructure Application. It was designed in collaboration with consultants on behalf of the National Transport Authority (NTA) and involved several optioneering exercises. We consider this project to be in the interests of Users due to the improved passenger experience it will provide (especially PRM passengers), and also its role in supporting the progression of the Infrastructure Application. We also note the significant revenue opportunity which would enhance the value proposition in terms of offsetting the capital costs.
- 2.70 The IFS has some concerns over the current proposed design of the ITH. We find that by allowing this project into the StageGate process this will afford Dublin Airport the opportunity to further refine the design of the project to improve the passenger experience. We propose to include the cost of this project as a trigger, inclusive of the cost of the ITH retail unit. We consider that an asset life of 25 years is more reflective of the likely useful life of this development than the 20 years used by Dublin Airport and note that 25 years is in line with the asset life of other new buildings in CIP27.

CIP27.02.15 – Consolidated Security and Screening Centre

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€62.9m	20 years	StageGate	Y

* Excluding the security element of this project, which has been included in the triggered allowance.

- 2.71 This project proposes a consolidated security and screening centre in Eastlands, for delivering airport supplies and construction materials to airside locations. Dublin Airport states that this centre will provide direct access via a bonded road and bridge provided by the Eastlands Cargo project. CIP2020+ included a similar project (CIP20.06.014- Screening & Logistics Centre). In 2022, we allowed for this project as a Deliverable, but it was not delivered. Dublin Airport states that CIP27.02.15 has improved upon the design of the previous project.
- 2.72 We note the IFS' concern that no justification for the required capacity and scale of the project has been provided. It recommends that further studies are carried out to determine the future capacity requirements and the size of the facility. Ryanair has also objected to the current design of the project criticising what it sees as a "logistically unworkable" solution.

2.73 In the 2019 Draft Determination, we noted the expectation that *“this facility would continue to provide benefits in future CIP cycles”* and that we *“expect it to reduce capital expenditure in this period and in future periods”*. The project sheet for CIP20.06.014 also anticipated a reduction in Opex arising from fewer vehicles entering the CPRSA (as referenced in the draft CEPA report).

2.74 However, we note there are some outstanding concerns over the current design of this project, in particular its interaction with the cargo village and we plan to engage further with Dublin Airport on this ahead of the Final Determination. For these reasons and given the scale of the project we propose to include it in the StageGate process to allow Dublin Airport to develop the design further while consulting with Users. Particularly where a variation of this project was an undelivered Deliverable in the previous period, we agree with Dublin Airport that it should receive a triggered allowance in this determination (in which we also include the cost of associated security equipment from CIP27.05.05).

CIP27.02.18 – Existing Pier 1 West Extension

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€32.4m	28 years	Flexible	N

2.75 This project proposes an extension above the existing Pier 1 West single storey extension building. The extension will provide 2 new gates with associated hold room areas, a Food & Beverage unit, and washrooms. The objective of the project is to provide enhanced gate capacity (which can be delivered in the medium term) and improved passenger experience at Pier 1 by aligning the number of gates and hold rooms to the number of stands served by this pier, where currently we note that there is insufficient gates and holding areas relative to the number of stands at the end of the pier. We note that Dublin Airport has secured planning permission for this development.

2.76 Each gate area will be connected to the apron via one of two new Vertical Circulation Cores (VCCs), ensuring there is segregated arrival and departure flows. These proposals will allow Pier 1 to serve 22 stands using 18 gates, leading to reduced gate-sharing, enhanced efficiency and improved passenger and staff experience. Three options were identified and assessed from a strategic, operational, financial, deliverability and regulatory standpoint before the proposed option was chosen.

2.77 The project is supported by Ryanair, although it criticises the proposed cost. The IFS has assessed the cost efficiency of the project as presented by Dublin Airport and has adjusted the rates and quantities for some elements which has resulted in the allowance we propose. We consider that this project is in the interests of Users. It will lead to an enhanced passenger experience with 18 gates/hold rooms rather than the current 16.

CIP27.02.20 – Existing Pier 2 Optimisation and Refurbishment

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€77.9m	15 years	StageGate	Y

* Excluding the retail element of this project, which has been included in the triggered allowance.

2.78 Dublin Airport states that Pier 2 currently provides an IATA Level of Service E, which is suboptimal. As such, this project is proposed to reconfigure Pier 2 in a phased manner and

improve the passenger experience through enhancements to the circulation and gate capacity. This project also includes upgrades and replacement of façade-glazing and cladding to meet sustainability requirements.

- 2.79 We note support from some Users for the project. Ryanair states this project should be paused until a decision is made on the future of the crosswind runway and regarding both Pier 2 and 3 extensions.
- 2.80 During the next regulatory period, decisions on the long-term strategic development of the airport may be made, including the future of Terminal 1 and Runway 16/34. As referenced by Ryanair, the future development of Pier 2 will be contingent upon such decisions. Any full replacement of Pier 2 appears likely to be a longer-term project, given that it is also dependent on (and would follow) the delivery of Pier 1 East and Pier 5. For that reason, as set out by Dublin Airport in Appendix 4 of CIP27, this project is asset life compliant and thus not nugatory. We consider therefore that the refurbishment of Pier 2 is in the interests of Users and will enhance the passenger experience. This project is warranted in any event, but particularly in the event that these other projects were further delayed.
- 2.81 We propose to allow for this project in the StageGate process. We also propose to trigger the project (inclusive of the cost of the retail unit from CIP27.03.10A) meaning the associated costs will not enter the RAB unless the project is progressed.

CIP27.02.21 – Existing Pier 3 Optimisation and Refurbishment

Proposed Allowance*	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€48.2m	15 years	StageGate	Y

* Excluding the Lounge element of this project, which has been included in the triggered allowance.

- 2.82 This project is intended to reconfigure the departures and upper level of the Pier 3 rotunda. The scope of works provides for the removal of the F&B units from the entrance to create additional gate hold space and a double height void. A visual connection will also be provided with a new VCC connecting the two floors. This project also includes upgrades and replacement of the Pier 3 rotunda façade-glazing and cladding to assist with Dublin Airport's sustainability requirements and heat and gain glare improvements
- 2.83 Similar to CIP27.02.20, the full replacement of Pier 3 in the future is dependent on the delivery of Pier 1 East and Pier 5. Dublin Airport anticipates that the Pier 3 link and Pier 3 rotunda will eventually be demolished, but this will not take place until at least the 2040's, and so this project is asset life compliant.
- 2.84 Our rationale for allowing this project is similar to the Pier 2 refurbishment project above. We note that this is an aged pier designed for smaller aircraft which therefore provides sub-optimal LoS. We propose to allow for this project in the StageGate process. We also propose to trigger the project inclusive of the cost of the lounge from CIP27.03.04 meaning the associated costs will not enter the RAB unless the project is progressed.

CIP27.02.22 – Dual Passenger Boarding Bridge to stand 315C

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€12.8m	15 years	Flexible	N

- 2.85 This project is a rollover from CIP.20.02.004 and plans to upgrade stand 315C on Pier 3 to include dual airbridges. This is particularly relevant with the expansion of CBP facilities in T2 potentially relocating non-US long haul operations to Pier 3. A new swing door system will allow for flexible passenger flow between gates 304 and 305. The upgraded stands will also feature FEGP and be adaptable for use by narrowbody aircraft where possible. The objective of the project is to support faster aircraft turnarounds, improve boarding and disembarkation flows.
- 2.86 We previously allowed for the dual airbridge on stand 315C as part of wider Pier 3 and Pier 4 development works. In 2019, we stated that the capacity provided by the piers was needed and we would allow for developments that would meet traffic demand. We found that the dual airbridge would provide increased flexibility and capacity, especially in the context of the growth in widebody aircraft operations from T1. In response to a question on why this project was not delivered in the previous period, Dublin Airport stated that there was some uncertainty around how other projects including the Underpass and Critical Taxiways would impact on Pier 3 operations.
- 2.87 We again propose to allow for this project, which aligns with the interests of Users. We note however that the IFS has some reservations over the capacity restriction of the associated gates 304 and 305 inside the building. As we intend to provide an allowance for the Pier 3 Bolt On project and also the Pier 3 refurbishment project, we consider that Dublin Airport will have further opportunities to explore the space implications at the gates and potential remedies. Dublin Airport is aiming to progress this project in tandem with the West Apron Underpass to minimise the associated operational disruption.

CIP27.02.25 – Pier 3 Arrivals Washrooms

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€2.6m	15 years	Flexible	N

- 2.88 This small project will deliver new washroom facilities along the Pier 3 arrivals route into Terminal 2. Dublin Airport reports that passengers arriving in T2 from Pier 3 frequently record low SQM scores due to the shortage of washroom facilities.
- 2.89 We consider that this project will contribute to the passenger experience in Terminal 2 and expect this investment will support Dublin Airport in achieving the passenger satisfaction targets, although the project is not likely to be delivered until later in the regulatory period. We allow for this project but assign an asset life of 15 years in line with the IFS recommendation.

CIP27.02.30 – Airfield Safety Projects

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€91.3m	15 years	StageGate	N

- 2.90 This project proposes a series of airfield safety projects which are intended to reduce airfield complexity, and enhance pilot situational awareness. The scope of works includes taxiway redesignation, North Runway safety improvements, dedicated fire lane to North Runway and hot fire training facility, Taxiway W4/venair strip widening, yellow green taxiway centreline and a new demarcated area that will provide aircraft parking, sufficient lighting, access/egress, paint markings and signage. We note that Dublin Airport deferred the Link 6 turns and fueller welfare unit elements proposed as part of the draft CIP to subsequent regulatory periods.
- 2.91 IATA notes the importance of prioritising airfield safety projects and proposes this project be designated as a Deliverable. While we agree with IATA's position, we consider there would be complexities with including this project as a Deliverable due to the multiple elements involved and the need to assess the delivery of each element separately. Instead, we believe there is merit in including this project in the StageGate process, considering the substantial cost of the project and that the scope of some elements may need to be further refined. For example, the fire road geometry intersecting Runway 10L-28R may be challenging as fire vehicles would likely have to reduce speed to safely manoeuvre from the fire road to the runway which could result in an increase in response time beyond the regulatory requirement. The IFS has also noted an apparent scope inefficiency, with paved shoulders included as part of Taxiway W4, which does not appear to be necessary. The cost estimate has been adjusted accordingly.
- 2.92 We note that safety improvements are aligned with both the interests of Users, and our objective to promote safety and security. We propose to allow for the project and include it in StageGate, as this will allow Dublin Airport the opportunity to consider design elements further and consult with Users as each scope element progresses.

CIP27.02.31 – Airfield Operational Projects

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€36m	18 years	F	N

- 2.93 This project includes Unit Load Device (ULD) storage in the North and West Apron, an equipment maintenance unit to support ULD storage on West Apron for Cargo operations, and a one storey airfield winter fleet facility. Dublin Airport states that ULDs are currently sub-optimally stored on end-of-life dollies or on the ground, thereby exposing them to potential damage.
- 2.94 In terms of the West Apron Cargo, Dublin Airport acknowledges that while the majority of cargo operators (bellyhold operators) will be relocated to the Eastlands, cargo only operators such as UPS, FedEx will continue to operate from the West Apron.
- 2.95 This project proposes a single, one storey, joined facility that will be of sufficient quality to support heavy winter fleet vehicles. Currently, most of the apron fleet is housed at the existing airside snow base located near Gate Post 4, which is scheduled for demolition to allow for Pier 5 enabling works. We asked Dublin Airport why such a large building is proposed considering the temperate climate of Ireland and the common practice across UK and Irish airports to store snow fleets outside. In response, Dublin Airport refers to the need for operational readiness throughout the winter period and that winter fleet vehicles require larger and dedicated storage solutions. It states that provision of such facilities will prolong the useful lives of winter vehicles. It claims that it is common across the UK (in airports such as Gatwick, Heathrow and Edinburgh) and Europe, to have dedicated winter

vehicle storage sheds either independent of other structures or aligned with vehicle repair workshops which enables protected ad-hoc maintenance during a winter event.

- 2.96 The IFS considers that the airfield ground lighting that will be provided as part of this project is operationally necessary and is in direct support of the cargo operators and their safety requirements. In its cost assessment, the IFS has only undertaken a review of the rates included as no drawings were provided by Dublin Airport for this project.
- 2.97 We consider this project to be in the interest of Users as it is likely to extend the useful lives of equipment. The project will also benefit cargo operators using the West Apron and will support all airport users by facilitating the ongoing maintenance of snow clearance and de-icing vehicles so that such vehicles are readily available during adverse weather conditions. As noted by the IFS, the proposed investment in West Apron lighting should provide safety enhancements to operations on the apron, especially during the winter.
- 2.98 We have estimated a weighted asset life of 18 years with reflects the durability of some of the assets within scope.

CIP27.02.34 – Advanced Visual Guidance Docking System

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€24.7m	10 years	Deliverable	N

- 2.99 This project builds on CIP20.01.074, under which A-VDGS at the Pier 1 West and Triangle Stands has been delivered, and A-VDGS on Apron 5H and the North Apron stands is intended to be delivered by the end of 2026. This project will cover four stands on Apron 5G, 17 stands on Apron 5H, three stands on existing Pier 1, one stand on the Triangle, three stands on Pier 3 to mitigate any impact caused by installation of the Underpass, five stands on West Apron- North (General Aviation Area) and 24 stands on the West Apron.
- 2.100 In response to a question about the availability of SESAR funding for A-VGDS, Dublin Airport stated that while it has not utilised any SESAR funding for A-VDGS in this current CIP, it will try to avail of SESAR funding for the future A-VDGS roll-out.⁴
- 2.101 In 2019, we stated that CIP20.01.074 would lead to improved airfield efficiency, safety, and information sharing between stakeholders, particularly in the context of Airport Collaborative Decision Making (A-CDM). We acknowledged that A-VDGS had previously received the support of airlines. Ultimately, we concluded that the project was in the interests of Users and designated it a Deliverable. We again propose to allow for the CIP27 of A-VDGS investment and consistent with the 2019 and 2022 approach, we include it as a Deliverable and retain the 10-year asset life assumption.

CIP27.02.35 – Fixed Electrical Ground Power (FEGP)

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€53.9m	15 years	StageGate	N

- 2.102 The project objective is to equip all remaining stands with Fixed Electrical Ground Power to provide a reliable power supply for aircraft on stand and support sustainability

⁴ https://transport.ec.europa.eu/transport-modes/air/single-european-sky/sesar-project_en

commitments. FEGP will be installed at on three stands on Pier 1. Units are set to be installed at Pier 1, the Triangle, the West Apron, Apron 5G and Apron 5H.

2.103 Dublin Airport considers that the quantity of FEGP infrastructure included in CIP27 is realistic to deliver over the period simultaneous to other proposed stand infrastructure such as fuel hydrants, AVDGS, on-stand CCTV, where appropriate.

2.104 In 2022, we stated that we continue to support the installation of FEGP at Dublin Airport as it produces more efficient, reliable, and environmentally friendly power sources, improves local air quality, and reduces traffic on the apron by reducing the use of Ground Power Units (GPU's). For these reasons again we propose to allow for this project and as in 2022 we include it in the StageGate process.

CIP27.02.36 – On Stand CCTV

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€16.4m	7 years	Flexible	N

2.105 This project provides for approximately 80 CCTV's on existing stands that currently lack surveillance coverage, in the following locations: Apron 5H, remaining stands without CCTV coverage on Apron 5G, Triangle stands, West Apron inclusive of General Aviation (GA) portion, West Apron Hangars, Engine Test Sites 1 and 4 and Hangar 6.

2.106 On-stand CCTV was delivered on some Apron 5G stands under CIP20.05.007. Previously, cameras were used solely for safety/security, and more recently are being used for aircraft turnaround analysis.

2.107 As in 2022, we consider this project aligns with our statutory objectives to support safety and security at Dublin Airport. As the IFS outlines, the additional CCTV units will ensure that incidents can be reviewed at any time and will allowing the Operations Resource Allocation Unit (RAU) to monitor aircraft stands. We give this project a flexible allowance and retain the previous asset life of 7 years.

CIP27.02.37 – Foul Water Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€19.6m	35 years	StageGate	N

2.108 This project provides for the repair and upgrade of the eastern campus foul water drainage network. Dublin Airport submits that the existing foul water network is aged, and given the anticipated increase in demand, it is expected to require remedial or preventative maintenance.

2.109 The scope of the project includes repair and upgrade of approximately 5 km of existing foul water pipework, construction of new foul water drainage trenches within the eastern campus, upgrade of pumping infrastructure, and a feasibility and design study to inform the future programme of works. Dublin Airport states that this project is distinct from the asset care project CIP27.04.12, which will upgrade end-of-life equipment to provide for existing capacity demands. CIP27.02.37 aims to evaluate and address future demand levels.

2.110 The IFS notes that the project details are currently at a very high level. Dublin Airport has

also referred to the early design stage and states that the cost estimate is high-level because the full scope of work will not be known until the feasibility study is complete. Dublin Airport suggests we include this in the StageGate process for that reason.

- 2.111 We previously allowed for a similar project in CIP2020+, noting it was in the interests of Users to avoid increasing maintenance costs and asset failure. Dublin Airport notes that CIP20.02.006 went largely undelivered as it had intended to deliver the water works together with capacity projects, such as Pier 5, which are again proposed in CIP27. We again propose to allow for this project in principle; however, as it is not expected to be delivered until well after the next determination period, we are proposing to have the capital costs enter the RAB from 2034 (which will be reviewed at the next determination). As a result, while we 'allow' for the project in principle, its costs do not impact the required revenues in this period.
- 2.112 We agree with Dublin Airport that this project should be included in the StageGate process given the high-level nature of the current proposal. We adopt the IFS proposed asset life of 35 years rather than Dublin Airport's 25 years given the durability of the buried infrastructure and pavement reinstatement included. We note that IATA similarly suggested a longer asset life of 40 years for each of the three water expansion projects.

CIP27.02.38 – Hydrant Water Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€6m	35 years	StageGate	N

- 2.113 Dublin Airport intends to carry out a feasibility study to evaluate the current hydrant water network capacity, asset longevity and future demand to determine the most effective infrastructure upgrades and locations. The project scope includes upgrading a part of the existing network in the eastern campus to deal with ageing assets and to accommodate the increase in demand.
- 2.114 In response to a request for further information on the condition of existing assets, Dublin Airport has provided us with the drawings showing the initial installation of the hydrants in 2008/2009. It has also noted the condition of cast iron pipework is poor due to asbestos in the area which requires removal following the replacement of 110m of pipework last year. The recent EV bussing project, which installed bus chargers in the area of Red Car Park identified that there are no hydrants in the area, which will also require installation, similarly the future Solar PV installation and other expansion projects.
- 2.115 Dublin Airport has proposed this project for inclusion in StageGate. While a relatively low value project, given that the scope is currently uncertain and high level, we agree with that approach. We propose to treat this project in the same way as CIP27.02.37 and not include it in the RAB until 2034 when it is expected to be operational (again to be reviewed at the next determination). Again, we adopt the IFS' proposed asset life of 35 years rather than Dublin Airport's 25, years given the durability of the buried infrastructure and pavement.

CIP27.02.39 - Potable Water Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€7.5m	35 years	StageGate	N

- 2.116 This project proposes to review the capacity of the current potable water supply and upgrade where necessary. A strategic feasibility study will evaluate the current capacity and condition of the airport's potable water network, forecast future demand, and identify the most suitable infrastructure upgrades and locations in line with CIP27 and upcoming developments.
- 2.117 Similar to the two projects above, this project is at a very early stage of design. The current cost estimate allows for the upgrade of 10% of the existing potable infrastructure, an additional 1000m³ storage tank and associated works. Again, Dublin Airport proposes to manage the expansion works and the feasibility study through the StageGate process.
- 2.118 We propose to treat this project in the same way as CIP27.02.37 and CIP27.02.38 and not include the costs in the RAB until 2034 when it is expected to be operational. Again, we adopt the IFS proposed asset life of 35 years rather than Dublin Airport's 25 years. We also agree with Dublin Airport to include this project in StageGate. While the cost of €7.5m is lower than a typical StageGate project, we refer to the IFS' comments that the indicative route is located at a PFAS hotspot close to Apron 5H and that the submitted specifications are at outline/concept stage and therefore may not identify the full scope of the project at this stage. We consider that the trajectory of the project will be better understood following the feasibility study and this can be best managed during the regulatory period through the StageGate process.

CIP27.02.40 – Pier 2 Bolt On Extension

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€14m	25 years	StageGate	N

- 2.119 This project provides for a feasibility study for a two-storey modular bolt on extension to Pier 2. It is intended to advance the concept sufficiently such that it can be progressed once Pier 1 East and Pier 5 become operational. If the works on Pier 1 East and Pier 5 advance during the regulatory period, Dublin Airport will begin preparing drawings and documents for a planning submission for the Pier 2 Bolt-On.
- 2.120 In the draft CIP27, Dublin Airport submitted a proposal for the full construction of the Bolt On project. The construction elements of the project have now been deferred to later CIP regulatory periods, following a prioritisation exercise that "*considered stakeholder feedback, construction resourcing, and funding*".
- 2.121 We note many of the submissions on this project relate to the decision on the future of Runway 16/34. Aer Lingus partially supports this project until further clarity is provided on Runway 16/34, IATA questions how a potential Bolt On would integrate to the long-term future of Pier 2 which Dublin Airport intends to fully replace in the context of Runway 16/34 being either decommissioned or retained, and Ryanair opposes extending Pier 2 until a decision is made on Runway 16/34.
- 2.122 While the IFS concludes that the scope will fulfil its objective of providing a feasibility design ready for progression to delivery stage if required, it cannot assess the efficiency of the scope due to the following omissions: the IFS would have expected to see a vision of the future Pier 2 to demonstrate that the Bolt-On extension can be integrated into a future Pier 2; and a concept of how the Bolt-On extension could be used as a satellite building during replacement of the remaining part of the existing Pier 2.

- 2.123 We acknowledge that one of the objectives of the study is to explore how the development of Pier 2 would interface with future decisions regarding Runway 16/34, which will aim to address the concerns of stakeholders referenced above. We also acknowledge the issues raised by the IFS in relation to the efficiency of the project scope. However, given the potential capacity enhancements that would result from extending Pier 2 (with or without Runway 16/34) - the provision of an additional two airbridge served MARS stands- we are inclined to allow for the feasibility study to allow Dublin Airport explore the future of Pier 2 and prepare any necessary planning applications within the period. We consider this would avoid any unnecessary delays should it wish to later pursue the Pier 2 Bolt on Extension. We consider the feasibility study to be in the interests of Users as early planning can help to identify the option that delivers the greatest value for money and can facilitate infrastructure delivery before capacity constraints become too severe.
- 2.124 Dublin Airport proposes this project is treated as Flexible initially with a potential transition to StageGate, which we think is likely to cause confusion when reconciling expenditure. Given the uncertainty of scope, we propose to allow for the project in the StageGate process. Dublin Airport should bring the outcome of the feasibility study to StageGate regardless of whether the proposal is to progress with the bolt-on or not. This will facilitate further consultation with Users regarding the future of Pier 2.

CIP27.02.41 – Pier 3 Bolt on Extension

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€4.9m	25 years	StageGate	N

- 2.125 This project proposes a feasibility and planning exercise for a modular “Bolt-On” Extension to Pier 3. Similar to the Pier 2 project above, the focus of this project is a feasibility and design study which includes an allowance for the preparation of planning drawings and documents which would facilitate making a planning submission during the period if needed. We note the Pier 3 Bolt-On would be a smaller undertaking than the corresponding Pier 2 project.
- 2.126 The Pier 3 Bolt-On is currently envisaged to have five gates over two levels which would serve 2 MARS (4 narrow body) stands on the northern side of the pier. At apron level, the extension would provide 2 bussing gates, to be integrated with the West Apron Underpass and the associated re-configuration of stands.
- 2.127 We note that Aer Lingus, IATA and Skylark (commissioned by Aer Lingus) have made submissions regarding the 25-year asset life of the Bolt-Ons, suggesting a longer period is more appropriate. We refer to the IFS assessment that while the permanent concrete and steel structures should have a 40-year asset life, the projects also include M&E systems, aeronautical equipment and interior finishes which have lower asset lives, thus we arrive at the 25-year asset life.
- 2.128 As with the Pier 2 Bolt On, we propose to include this project in the StageGate process for similar reasons. Again, we expect that Dublin Airport will bring the results of the feasibility study to StageGate, whether the proposal is to progress with the bolt-on or not.

CIP27.02.43 – Passenger Boarding Zone Relocation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€39.3m	28 years	StageGate	Y

- 2.129 To facilitate the construction of Pier 5, the existing South Apron PBZ needs to be demolished. This project proposes a single storey replacement PBZ in the South Apron, across from Pier 5. In the draft CIP27, Dublin Airport presented the PBZ as an either/or proposal with a new Pier 6 with fixed links. The PBZ was ultimately identified as a more cost-efficient solution to meet forecast stand and boarding capacity requirements.
- 2.130 The five walk-out gates included in this PBZ facility would serve nine narrowbody stands, four of which would be MARS stands thus accommodating two widebody aircraft. Like the current facility, a regular shuttle service will transport passengers from Pier 4 or Pier 5 to the facility with walk-out access from the gates. The design proposes to increase operational flexibility by supporting both CBP and non-CBP operations and an internal swing gate arrangement to allow the PBZ to operate in different modes.
- 2.131 In the 2022 Review Decision, we included the cost of the replacement PBZ, noting User support. We note the demolition of the existing PBZ will result in the loss of necessary stand and gate capacity if not replaced. We consider the facility to therefore be in the interest of Users. We also note positive comments from the IFS regarding the flexible and efficient scope of the PBZ, and the fact that this project forms an important part of the To70 simulation analysis.
- 2.132 As in 2022, we propose to include this project in the StageGate process, and given its interdependency with Pier 5, we assign a triggered allowance.

CIP27.02.47 – Remote Bussing Lounges

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€6.8m	25 years	Flexible	N

- 2.133 This project provides for new bus gates in the Old Central Terminal Building (OCTB). A similar project (CIP20.03.017) was included with a Flexible allowance in 2019. However, that allowance was instead used for the relocation of bus gate 335 in T2. CIP27.02.47 is now a revision of the original scope of CIP20.03.017.
- 2.134 The project seeks to reactivate and refurbish the two gates at the rear of the OCTB to serve as bus gates for T1 departing passengers, with a new arrivals injection point that will provide direct access from the bussing drop off zone into the immigration hall. It also provides for upgrading the external kerb.
- 2.135 We have previously allowed for this project and although Dublin Airport used the Flexible allowance to deliver other projects (as it is entitled to do), we consider that the project as proposed is still in the interest of Users to meet demand. We note that the To70 report identified Pier 1 immigration as potential capacity pinch point once Pier 1 East is delivered. This project will aim to provide a smoother transition into the T1 Immigration Hall that may lead to a more efficient queuing set up. We propose to continue to allow for this project and again consider it Flexible.

CIP27.02.48 – Terminal 2 Check in and Sortation Optimisation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€61.5m	15 years	StageGate	Y

- 2.136 This project aims to provide additional check in desks and self-service kiosks in the central hall of T2. The T2 check-in solution aims to provide an indicative 5 additional check-in desks and self-service kiosks within the existing Terminal 2 check-in hall. However, it states that it is exploring a compressed layout that has been deployed at Edinburgh airport and will seek to provide the greatest increase in baggage input capacity within the existing space available. The project also includes an expansion of the CIP2020+ project Early Bag Store (EBS) (CIP20.03.028). This CIP2020+ project, which is now under construction, aims to provide space for 700 hold bags as well as a Hold Baggage Screening (HBS) facility.
- 2.137 The EBS extension proposes the construction of a 1500m² free-standing first-floor extension above the existing Terminal 2 service yard to support the expansion of EBS capacity and will directly connect to the EBS system. It also includes an allowance to optimise screening and sortation capacity, enabling more efficient load-sharing between Terminal 1 and Terminal 2 sortation systems.
- 2.138 The To70 report referenced that the T2 check-in area has enough space and passenger processors to provide an adequate level of service, as both time and space metrics stay within acceptable levels, with two notable exceptions: 1100 and 1900 where passengers face long waits. It notes that the additional check-in counters envisioned in CIP27.02.48 could alleviate this issue. We also note that when the EBS came to StageGate 1 in 2025, Dublin Airport said there is limited potential for future expansion within the current T2 Baggage Hall and that ultimately, any future expansion will depend on the availability of new space and would need to be planned in the context of the entire baggage system.
- 2.139 In relation the EBS, in the Original 2019 Determination we noted that *“increasing transfer passengers is a core part of the business strategy of certain airlines, as well as the National Aviation Policy. This project would provide more than sufficient capacity to meet transfer bag demand”*. In 2022, when Dublin Airport proposed to defer the EBS, it received airline support to progress the project. We consider that the aim to grow transfer passengers remains valid today and aligned to the NAP. We also consider the additional check in desks and SSKs are likely to result in an improved passenger experience at T2 and that an improved EBS is in the interests of Users.
- 2.140 We propose to allow for this project and include it in the StageGate process, similar to the EBS in CIP2020+. We agree with Dublin Airport to include the project as a trigger. Based on the IFS recommended asset lives of the individual project components, we estimate a weighted asset life of 15 years.

CIP27.02.49 – South Apron Handler Accommodation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€8.5m	20 years	StageGate	Y

- 2.141 This project proposes to repurpose the section of Cargo Unit 3 that is currently occupied by An Post to provide ground handler accommodation. The refurbishment will include the

provision of appropriate welfare and operational support areas, such as locker rooms, canteens, drying rooms, and briefing spaces, ensuring a safe, compliant, and fit-for-purpose working environment.

- 2.142 The IFS considers the proposed scope to be efficient but recommends an asset life of 20 years rather than 10 years proposed by Dublin Airport. We agree with the IFS' proposed asset life. We allow for this project given the requirement to demolish the existing facility to allow for the South Apron expansion. We propose to include it in the StageGate process consistent with previous similar projects. We agree with Dublin Airport to include it as a trigger project due to its dependency with the Cargo Eastlands project and the South Apron works.

CIP27.02.50 – PFAS on Construction Sites

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€106.8m	20 years	StageGate	N

- 2.143 This provides for the management of PFAS impacted materials (soil, cement, and groundwater) resulting from proposed/potential projects (many of which are trigger projects) with uncertain contamination levels and volumes. It encompasses 33 projects across all groupings in CIP27. This project is distinct from CIP27.01.11 (Legacy PFAS Mitigation and Remediation) which funds remediation measures for retained infrastructure (e.g., existing drainage systems) and any hotspot treatment beyond the scope of excavation.
- 2.144 While we agree with the necessity of addressing this issue in the context delivering such projects, we do not include this allowance in the base caps as done by Dublin Airport in its price cap model. Instead we align it with Dublin Airport's proposed approach in the CIP27 document, which states that *"the funding will be provided only as required for each project after the detailed site investigation. Additionally, if the projected budget for each project is exceeded, this will be specifically addressed during the StageGate process; otherwise, the draw-down will be documented in each cycle. Only the final drawdown will be included in the RAB at the conclusion of the regulatory period, in summary and for clarity, if no PFAS is found or the removal costs are lower than anticipated for each project, the funds will not be included in the RAB"*.⁵
- 2.145 We do not disallow the project in principle however, and we include it in the StageGate process. Dublin Airport has included the estimated cost of PFAS for each affected project in the CIP27 project sheet. The total across 33 projects is €106.8m. Benchmarking has also been undertaken using cost data from recent Dublin Airport projects, such as Apron 5H, to provide an appropriate basis for the estimate and ensure market alignment.
- 2.146 We expect that as each individual projects advances through StageGate Dublin Airport will also consult on the level of PFAS-related costs. We propose to report on the remaining allowance in CIP27.02.50 in each cycle where Dublin Airport reports on costs incurred. This will facilitate transparency in the reconciliation of expenditure at the end of the period.

⁵ CIP27 pg.308

3. Commercial

- 3.1 As outlined in the capital cost section of the Draft Determination, we have included 70% of the total forecast capital costs of the commercial projects. In the case of each project below we refer to the IFS assessed efficient allowance in nominal terms.

CIP27.03.01A – Long Term Express Red Surface Car Park Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€26.4m	20 years	StageGate	Y

- 3.2 This project is a rollover from CIP20.04.005. The objective is to increase the long stay passenger parking capacity on the eastern campus. It is intended to be a surface level facility expanding on the existing Express Red surface car park and will provide an additional 1,876 additional car parking spaces. Dublin Airport has provided a positive business case for this project.
- 3.3 In the 2022 Review Decision, we included this project with a Flexible allowance. We again propose to include this project given the high level of demand for car parking spaces. We note that Dublin Airport's car parks continue to be constrained at peak months of the year, including 2025 following the entrant of a new competitor. We include a commercial revenue uplift in the final year of the period.
- 3.4 As this project is included in the Infrastructure Application, we recognise the potential planning related delivery challenges and agree with Dublin Airport to include this project as a trigger. We also include it in the StageGate process and retain the 20-year asset life used in the 2022 Review Decision.

CIP27.03.01B – Other Car Parks

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€42.3m	20 years	Flexible	N

- 3.5 This project is a combination of both rollover from CIP20.04.009 (Staff Car Park Expansion), and new initiatives designed to improve both long term and short-term parking options for passengers and staff. This includes upgrades to current parking facilities and systems but also relatively new offerings such as Drop and Go. It consists of the following:
- Staff Car Park North- provision of 700 car parking spaces
 - Staff Car Park Remote South- provision of approximately 950 spaces
 - Long term Holiday Blue Drop and Go
 - Car Park Management Systems (CPMS)
 - Digital Interactive Wayfinding
 - Car Rental/T2 Airline Crew Shuttle Drop off and Pick Up area
- 3.6 Dublin Airport has provided positive commercial business cases for the revenue generating aspects of the project (Staff Carpark South and North, Long-term Holiday Blue Drop and Go). We propose to allow for this Flexible project and profile capital cost remuneration

entering the RAB over two years from 2030 as per the delivery schedule. We include a carparking revenue uplift for the Staff Remote South and Staff Northeast starting in 2030 and the Drop and Go Blue from 2031. As with the Red Car Park above, we retain the 20-year asset life from the 2022 Review Decision rather than the 25 years proposed by Dublin Airport.

CIP27.03.02 – Car Rental

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€83.5m	20 years	StageGate	Y

- 3.7 This project is a rollover from CIP20.04.002. It proposes to refurbish three existing car rental buildings, add three new customer collection buildings at the Eastlands car rental site, increase car storage capacity, and provide an additional 1,700 car parking spaces. A positive commercial business case has been provided for the car rental storage component of the project.
- 3.8 We included this project as a Deliverable in the 2022 Review Decision. To date, Dublin Airport has stated that some maintenance and mechanical upgrade works have been completed on the existing buildings. It confirms that the expansion element of the CIP is underway. A two-phase planning strategy has been developed, with the first phase application due to be submitted in Q3 2026.
- 3.9 We note the project has received support from car hire operators who have been engaged in the design consultation process and who want to see timely delivery of this project. In the 2022 Review Decision, we concluded that this project would enhance the passenger experience for those hiring cars. We consider this remains the case under the revised version of the project submitted as part of CIP27. However, this is a significant, costly project which Dublin airport has consistently not delivered. We propose to again allow for this project but include it as a trigger and as part of the StageGate process. We also include a commercial revenue uplift of €0.3m in 2030 and €1.2m in 2031 in our property concessions forecast (included within the trigger amount rather than the base price cap). Consistent with 2022, we adopt a 20-year asset life as opposed to the 15 years proposed by Dublin Airport.

CIP27.03.03 - OCTB Refurbishment

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€10.7m	20 years	StageGate	N

- 3.10 This is a rollover project from CIP20.04.034. It provides for light refurbishment works to the Old Central Terminal Building (OCTB). Dublin Airport views the vacant landside section of the OCTB as a commercial opportunity. It assesses that refurbishment of this space can provide rental accommodation, and complements other CIP27 initiatives such as the airside bussing lounge. The scope includes undertaking a feasibility study to investigate potential future uses of the space.
- 3.11 Dublin Airport has suggested this project be included in the StageGate process to allow for further consultation with airlines on the future use of the facility. We consider it inefficient that the OCTB building is left unused and are proposing to continue allow for this project.

A revenue earning use of the OCTB would ultimately be to the benefit of Users.

CIP27.03.04 - Airline Lounges

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
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€48.7m

12 years

Flexible

N

- 3.12 This project includes a programme of refurbishment works to existing lounges Liffey Lounge and Martello East. The project also proposes to fit out lounges in new areas proposed in CIP27, including Pier 1 East, the CBP Extension and the upper level of Pier 3. Dublin Airport has provided a positive business case for the CBP extension only. Refurbishment projects (Liffey Lounge and Martello Lounge) are stated to be revenue protecting.
- 3.13 Emirates supports enhanced airside lounge offerings, while Ryanair opposes this level of investment in lounges and states that a Pier 1 lounge is not needed. Ryanair notes that a projected asset life of 7 years is not cost effective. In response to Ryanair, we refer to Section 8 where we forecast strong growth in lounge revenue performance over the upcoming period.
- 3.14 We propose to allow for this project and designate it as Flexible. We agree with Ryanair that a 7-year asset life is short for the proposed works and instead retain the 12-year asset life used for CIP20.04.017 in the 2022 Review Decision. While we do not trigger this specific project, 83% of the project cost is included in the following trigger projects: CIP27.02.04 Terminal 2 CBP and Transfer Extension, CIP27.02.02 Pier 1 East, and CIP27.02.21 Pier 3 Optimisation and Refurb.
- 3.15 We include a commercial revenue uplift of €0.8m in 2029, rising to €1.8m in 2030 and €2m in 2031 for the Post CBP Lounge (linked into the trigger project) and the T2 IDL Lounge (in the base regulatory settlement). We also include an estimated Opex impact of €0.8m from 2030.

CIP27.03.05 – Commercial Property Refurbishment

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
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€21.2m

7 years

Flexible

N

- 3.16 This is a broad allowance for the maintenance and refurbishment of commercial properties across the airport campus. It is proposed to address terminal and ramp accommodations, cargo terminals and warehouse facilities, hangar and airline accommodation and campus operational buildings and offices. Similar allowances have been included in previous determinations.
- 3.17 Dublin Airport spent the full CIP20.04.025 allowance and delivered refurbishment works to Skybridge House, works to the offices at the link corridor in T1, refurbishment works at the South Apron office accommodation, Terminal 1 airline offices, and creation of additional storage accommodation in T2. As in 2022 we allow for this Flexible project and consider it to be in the interest of users by protecting property revenue streams. We retain the 7-year asset life used in the 2022 Review Decision, as opposed to the 10 years proposed by Dublin Airport.

CIP27.03.06 – Platinum Services Collinstown House Upgrade

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€34m	10 years	Flexible	N

- 3.18 This project provides for the renovation and expansion of the existing Platinum Services Facility within Collinstown House. Key deliverables include expansion of 2nd floor works, refurbishment of existing ground and first floors, and upgrades to the façade. The existing building is assessed to be one of the worst performing buildings on campus in terms of energy efficiency. As part of CIP20.04.016, Dublin Airport delivered four new private suites, toilets/showers, new kitchen, new reception and a new meeting room on level 1. On the ground floor it upgraded the kitchen, the walkway link corridor and added minor furnishing upgrades.
- 3.19 We consider that the works proposed will enhance the passenger experience and propose to include it with a Flexible allowance. We allow the project to enter the RAB in 2031 when it is expected to be operational and include a commercial revenue uplift of €1.6m in 2031. We agree with the responses from IATA and Ryanair that the proposed 7-year asset life is too short and retain the 10-year asset life used for the similar project in 2022.

CIP27.03.07 – Media Sales Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€13.9m	5 years	Flexible	N

- 3.20 The primary focus of this project is to upgrade existing digital advertising assets, introduce new digital technologies and expand the overall digital media infrastructure. A positive commercial business case has been provided, but only for a portion of the project (€7.5m of the Capex outlay relative to the entire Dublin Airport project proposal of €14.72m). Dublin Airport states that upgrades to the existing digital assets is revenue protection, rather than incremental revenue generation.
- 3.21 We propose to provide a Flexible allowance for this project and include commercial revenue uplifts of €0.5m in 2028, €0.8m in 2029, €1.1m in 2030 and €1.3m in 2031.

CIP27.03.09 – Commercial Innovation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€2.4m	5 years	Flexible	N

- 3.22 This project sets out to explore revenue-generating initiatives, and also enhance the passenger experience. Dublin Airport has submitted a positive business case for the project though we note it is at a high level considering the exact scope of the projects is not defined. We consider it to be in the interest of users that Dublin Airport explores further revenue generating initiatives and we include it with a Flexible allowance. We include an uplift to reflect an associated revenue target ranging from €0.5m from 2029 to €2m by 2031.

CIP27.03.10A – ARI retail projects

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€21.2m	7 years	Flexible	N

- 3.23 Dublin Airport proposes various developments and refurbishments that aim to enhance the airport's commercial retail offering. New commercial units are proposed for: The Integrated Transport Hub, Pier 1 East, Pier 1 Existing Expansion, Pier 5 and the CBP extension. Refurbished commercial units are proposed for the following locations: T2, T2 arrivals Pier 2 and Pier 3. Dublin Airport has provided positive business cases for the new commercial units.
- 3.24 Similar to the approach with the Airline Lounges project, while we do not trigger this project specifically, 45% of the cost of the project is included in the following trigger project allowances: CIP27.02.04 Terminal 2 CBP and Transfer Extension, CIP27.02.02 Pier 1 East, CIP27.02.14 Integrated Transport Hub, CIP27.02.05A Pier 5 and CIP27.02.20 Pier 2 Optimisation and Refurb.
- 3.25 We include a Commercial Revenue uplift of €1.5m in 2028 and 2029, rising to €2.1m in 2030 and €2.6m in 2031. We do not include commercial uplifts for the ITH, Pier 1 East or Pier 5 which are not expected to be operational until after the period. We note the approach is in line with the comments made by IATA that projects associated with new infrastructure should be linked to those projects.

CIP27.03.10B – Terminal 2 IDL ARI Refurbishment

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€25.7m	7 years	StageGate	N

- 3.26 A full redevelopment of the Direct Retail facilities in the International Departure Lounge (IDL) in T2 is proposed. The total area to be renovated is similar in size to the T1 IDL project, which has progressed through StageGate in 2025. Dublin Airport considers that the duty-free offering in T2 is out of date as it has not been upgraded since 2018. Under the proposed Pier 5 and CBP expansion, the passenger route and profile in T2 is expected to change. Consequently, Dublin Airport is proposing to review all duty-free units and their associated passenger flow and walk through, with the aim of improving the overall passenger experience and revenue generation.
- 3.27 In relation to the T1 IDL in the 2019 Determination, we concluded that the increased space per passenger and increased commercial floor space would lead to both an improved passenger experience and increased commercial revenues. We consider that the proposed T2 IDL has the potential to deliver similar benefits. In addition, Dublin Airport has provided a positive business case for the project. We propose to include this project in the StageGate process and currently include commercial revenue uplifts of €4.2m in 2028 and 2029, €5.4m in 2030 and €8m in 2031. We also include Opex uplifts of €0.9m in 2028, growing to €1.2m from 2029.

4. Asset Management

- 4.1 Similar to the Commercial approach above, we have included 66% of the total forecast capital costs of the asset care projects in the cost base. In the case of each project below we refer to the IFS assessed efficient allowance in nominal terms. We note the substantial level of proposed investment in this category in CIP27 and consider it will be challenging for Dublin Airport to deliver all of this within the next period. While we have not disallowed any individual project in this envelope, the group level reduction reflects our view that Dublin Airport is unlikely to deliver the total level of investment.

CIP27.04.01A – Airfield Pavement Rehabilitation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€166.5m	25 years	StageGate	N

- 4.2 This project proposes to replace and rehabilitate airfield pavements (aprons and taxiways) across the airfield. It is proposed that half of the works will be delivered in tandem with associated larger airfield projects, with the other half delivered as standalone works. The project aims to deliver 219,370 square meters of pavement rehabilitation works – 45,050 sqm of apron pavement and 174,320 sqm of taxiways over the coming regulatory period.
- 4.3 50% of the taxiway rehabilitation works relate to Taxiway S, which will undergo full pavement reconstruction, drainage upgrades, and replacement of the airfield ground lighting (AGL) system. Dublin Airport has provided a condition survey report of Taxiway S which confirms several defects, and also references the need to address drainage infrastructure in the area. We have reviewed additional evidence from Dublin Airport which illustrates the deterioration of certain pavement. Dublin Airport has also provided a pavement history site map which records when each area was last repaired/installed. In CIP2020+, Dublin Airport rehabilitated 61,536 square metres of apron and taxiway pavements (not including the 33,000 square metres of new pavement on Apron 5H). It is progressing other elements as part of the Critical Taxiway South and West Apron Underpass projects.
- 4.4 We are proposing to allow for the project. As in previous determinations, we consider pavement rehabilitation to be in the interests of Users as it will protect the condition of key airport assets, and also prevent further degradation which could ultimately lead to more costly repairs.
- 4.5 Ryanair opposes this project. It refers to the existing pavements which were installed between 1940-1960 & remarks that the proposed 20–30-year asset life is short in comparison. We note this comment was made when roads & apron/taxiway projects were combined. We do not accept this submission from Ryanair as it is not optimal practice for critical airfield pavements such as taxiways to be in service for such a prolonged period of time. We consider this would lead to more expensive large-scale investments if regular rehabilitation is not facilitated.
- 4.6 We agree with Dublin Airport that this project should be included in the StageGate process. We also note there is a significant risk of PFAS contamination with the areas identified for rehabilitation. The eventual costs will be addressed during each StageGate cycle and outturn reported against CIP27.02.50. We have adopted the 25-year asset life used by Dublin Airport in its price cap model and estimate it to be aligned to the IFS assessment of

20 years for flexible pavement and 30 years for rigid pavements.

CIP27.04.01B – Airfield Pavement Rehabilitation (Road and Joining)

Proposed Allowance		Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€20.5m		25 years	Flexible	N
4.7	The Apron Roads Rehabilitation Programme is intended to address the network of roads used by airport personnel and service vehicles. Dublin Airport aims to rehabilitate approximately 25,640 m ² of airfield roads, 8,850 m ² of apron roads, and 16,790 m ² of the southern perimeter Road. The project also proposes to replace/reseal approximately 43,000 m ² of airfield pavement joints. To date, Dublin Airport has delivered 24, 464 m ² of road rehabilitation under CIP2020+ project CIP20.01.004.			
4.8	We have reviewed and validated the apron road condition report and the road surface PSCI reports submitted by Dublin Airport. In line with our assessment in 2019, we propose to allow for this project as it will provide critical maintenance to key airport assets and prevent further degradation which is in the interest of Users.			
4.9	We agree with Dublin Airport that this project should be designated as Flexible and have adopted the 25-year asset life which it included for this project in the price cap model.			

CIP27.04.02 – Roads and Car Parks

Proposed Allowance		Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€85.7m		15 years	Flexible	N
4.10	This project involves the maintenance, rehabilitation and upgrade of internal roads and car park assets across the airport campus. The scope includes full structural rehabilitation of north parallel road, replacement and upgrade of road signs, guideposts, barriers, lighting, and utility poles, resurfacing and drainage upgrades in staff car parks, enhancements to public car parks, improvements to the west link road, Corballis road north, and T1 departures road and upgrades to internal traffic light junctions. Approximately 88% of the total cost relates to the public carparks rehabilitation.			
4.11	Dublin Airport reports customer dissatisfaction with the current condition of the long-term car parks. It intends to address the feedback as follows: spine road improvements, porous surface rehabilitation, kerb, light and shelter replacement in the long-term red car park, resurfacing and improvements to drainage in the long-term blue car park, structural and surface sealing upgrades in multi-storey car parks. we note this project builds on previous improvements to public car parks under CIP20.01.049.			
4.12	We note the IFS has raised concerns over Dublin Airport's approach to pavement maintenance. It proposes that Dublin Airport develop a more proactive maintenance strategy that optimises pavement Capex rather than proposing regular costly interventions when the pavement has reached the end of its lifecycle.			
4.13	Overall, we consider it is in the interests of Users to allow for investment which will protect the significant commercial revenues associated with airport car parks and to ensure that the passenger experience is not diminished. We are proposing a Flexible allowance.			

CIP27.04.03 – Airfield Lighting, Control and Signage Upgrades

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€23m	22 years	Deliverable	N
4.14	This project includes the replacement of legacy circuits on aprons and taxiways and rewiring of lighting on runways; upgrades to signage and docking guidance systems; expansion of intelligent lighting controls; and improvements to power resilience through generator and UPS enhancements. As part of the project, Dublin Airport will explore the integration of solar energy and use of super capacitor technology.			
4.15	The proposed upgrades are intended to replace legacy systems and bring them back into line with current EASA CS-ADR-DSN design and performance standards for runway, taxiway and apron lighting, stop bars, runway guard lights and control systems.			
4.16	We consider that all elements of this project are in the interests of Users to ensure the continued reliability of key airport assets. Given the importance of this project to airfield safety and operations we are proposing to designate it a Deliverable. We have previously included similar lighting and signage projects as Deliverables in this envelope. We have estimated a weighted asset life of 22 years, based on the IFS' assessments of each individual scope element.			

CIP27.04.04 – Building Fabric Upgrade

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€32.7m	25 years	Flexible	N
4.17	This project proposes a programme of upgrades that aim to extend the useful life of key structural elements across Terminals 1 and 2. The scope includes repairs to roofs, façades, canopies and exposed structural components. Repair and protection of steel structures and upgrades to the Terminal 1 Pier 1 and skybridge roof are primary objectives of the project. Problem areas such as the Terminal 2 VCC, Terminal 2 car park link building, Terminal 2 airside columns and tie-rods, and Pier 4 Columns have been identified through inspections, investigations and reactive maintenance activity.			
4.18	Dublin Airport has provided photographs which show structural damage to key infrastructure referenced above, which has allowed us to validate this position. We consider it is in the interest of passenger safety and the overall passenger experience that Dublin Airport carry out these works. We also consider it to be in the interest of Users that the works are not delayed to the extent that would eventually require a greater level of investment due to further deterioration.			
4.19	Dublin Airport proposed an asset life of 12 years for this project. As the IFS has determined, this is far too low for a project where the works involved are mostly structural improvements. We instead adopt the IFS proposal of 25 years, and include the project with a Flexible allowance.			

CIP27.04.05 – Airfield Maintenance Base Improvement Programme

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€28.6m	20 years	Flexible	N

- 4.20 This project proposes a new vehicle maintenance facility to support the servicing of the airport's operational vehicle fleet, including in the context of the increase in number of electric vehicles being deployed at the airport. The proposed workshop will have an approximate area of 18,000 m², including 3 full length vehicle inspection pits with movable axel lifters, integrated waste oil draining and pumping stations, two 4.5-tonne lifting ramps and one 6-tonne four-post ramp with laser alignment system.
- 4.21 In CIP2020+, Dublin Airport delivered upgrades to the airfield maintenance base welfare facilities and replaced the potassium formate tanks. These works are stated to be independent of CIP27.04.05.
- 4.22 Dublin Airport estimates that this project will reduce operating and maintenance costs in the future. We also expect it to support Dublin Airport's sustainability objectives by providing EV infrastructure and resource-efficient systems. We consider the purpose-built facility with drive through facilities is likely to deliver efficiencies on the airfield. We therefore propose to include the project and assign a Flexible allowance.

CIP27.04.06 – Airfield AGL Substation Improvement Programme

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€14.1m	15 years	Flexible	N

- 4.23 It is expected that some of the Airfield Ground Lighting (AGL) substations across the airport will reach end of useful life in the next regulatory period. Some elements of the existing systems are no longer supported by manufacturers. The aim of this project is to target deficiencies across multiple substations with the aim of improving resilience and standardisation. Substation generators A and B and one end of life mobile generator will be replaced under this project, both of which will exceed the industry standard service life of 20-25 years if not replaced in the upcoming CIP.
- 4.24 AGL substations provide critical power, control and monitoring functions for runway and taxiway lighting systems and associated safety-critical assets. We consider that it is in the interest of Users that Dublin Airport maintains operational continuity of such key airport assets. We propose to allocate a Flexible allowance for this project and accept Dublin Airport's proposed asset life of 15 years.

CIP27.04.07– Campus Buildings Critical Maintenance

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€3.3m	25 years	Flexible	N

- 4.25 This is a broad allowance to cover the maintenance and repair of the airport campus buildings, which includes terminal buildings, multistorey car parks, and various support facilities. The allowance will address structural and roof repair works, deliver regular

condition assessments and provide for maintenance schedules which will subsequently extend the service life. The campus buildings included in the scope of this project are those that are not currently earmarked for demolition as part of future capacity. We consider that maintaining these buildings to avoid any further degradation and cost escalation is in the interests of Users, and thus we have provided a Flexible allowance for this project.

- 4.26 We adopt the IFS proposed asset life of 25 years reflecting the structural nature of the repairs proposed that would have a longer useful life than the 20 years proposed by Dublin Airport.

CIP27.04.08 – Piers and Terminals Critical Maintenance

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€4.1m	15 years	Flexible	N

- 4.27 This project proposes a series of minor refurbishments to replace cracked window panes, renewal of flooring areas, replacement of door sets and improvements to the building fabric in back of house areas. The scope focuses on areas of the airport that have heavily-used public circulation areas, and back of house corridors, which experience continuous staff movement, trolley traffic, deliveries and impact damage. Like CIP27.04.07, the scope of this project has been developed based on previous experience of maintaining the terminal buildings over a five-year period. We included a similar allowance in the 2022 Review Decision, which Dublin Airport has spent.

- 4.28 As we have noted previously, such maintenance projects are in the interests of Users as they maintain the operability of these assets, prevent further and typically more costly degradation, and ensure the passenger experience is not diminished by poorly maintained infrastructure. We are proposing that the allowance is Flexible, and we retain the asset life of 15 years for the corresponding CIP2020+ project.

CIP27.04.09 – Asset Management Stores Consolidation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€2.4m	20 years	Flexible	N

- 4.29 Dublin Airport reports that it currently operates with 34 separate asset storage locations distributed across the campus. This project is intended to assess the inefficiencies of the current set up and develop a strategy to improve the efficiency, accuracy, and security of asset inventory management at the airport. The development of a centralised, purpose-built inventory store by constructing an extension to the existing asset management landside maintenance base is proposed to address such inefficiencies.

- 4.30 The scope of this project includes the development of architectural and engineering plans for the new extension of 565 m² to the current maintenance base and integration of 2,300 m² of stores including structural works, utilities, climate control, and secure access systems. The newly proposed facility will be equipped with modern inventory management technologies which will be integrated with the airport's Enterprise Management (EAM) platform to allow for real time stock visibility.

- 4.31 We consider that efficiencies will be generated from the consolidation of multiple fragmented asset stores into one centralised facility. We allow for this project and designate

a Flexible allowance. We adopt the IFS proposed asset life of 20 years in line with other facility projects.

CIP27.04.10 – Landside Gardening and Maintenance Consolidation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€1.6m	20 years	Flexible	N

4.32 This project involves the relocation and consolidation of all landside gardening operations to the existing landside roads depot, creating a single, centralised base for staff, polytunnels, and machinery. This extension will accommodate a purpose-built workshop and dedicated large spares storage areas currently based at the carpenter's facility.

4.33 We note that one of the main motivations for this project is that the existing landside gardening facility is in a central location that Dublin Airport may want to develop in the future. We consider that from a future planning perspective it is reasonable to move the landside gardening in a further away location from the terminals. We include this project with a Flexible allowance and adopt the IFS proposed asset life of 20 years.

CIP27.04.11 – Fire Risk Mitigation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€15m	15 years	Flexible	N

4.34 This project will establish a dedicated fire safety risk mitigation fund. The scope includes the provision for fire safety surveys, fire engineering design and consultation, rectification and upgrade works, certification and regulatory update and risk-based prioritisation framework.

4.35 We asked Dublin Airport for examples of projects where fire safety risks have arisen on recent projects. It refers to additional fire remediation works on Pier 3 that were identified following opening up works and included upgrades to the stair lobby and central plant room walls on level 10 and the provision of a large quantity of fire dampers, extensive service diversions and associated certification.

4.36 Dublin Airport identifies the T1 ARI retail project and T1 lounge project in CIP27 as also requiring fire remediation allowances and anticipates carrying out the following works: upgrade defective structures, including slab voids, deficient partitions, deficient dampers, fire blanket remediation, service alteration and associated certification to achieve fire compliance.

4.37 We note that compliance with such requirements is mandatory, and in the interests of fire safety and thus Users. We therefore provide an allowance for this project. We agree with Dublin Airport to include this as a Flexible project.

CIP27.04.12 – Surface Water and Foul

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€2.3m	35 years	Flexible	N

- 4.38 This project plans to upgrade foul water and surface water infrastructure across the airport campus. The scope includes the replacement of ageing pumps and ejector systems supporting the foul water network, upgrades to end-of-life assets in the wider surface water network such as road gullies, slot drains, french drains, open channels and manholes, upgrades to attenuation facilities including pumps, penstocks and sluice valves, and SCADA upgrades.
- 4.39 We asked Dublin Airport why CIP20.02.006 was not delivered in the previous period, which had a similar scope to this project. It stated that while a number of local interceptor replacements and related works were delivered, the wider programme was significantly delayed due to the dependence on larger airfield and terminal projects which were materially delayed in the context of planning and delivery challenges.
- 4.40 Dublin Airport has provided us with a pumping systems asset health review and replacement programme, which assesses the airport's pumping asset base. The report finds that the current pump portfolio contains a significant proportion of legacy wastewater and drainage assets, and that several assets exhibit increasing obsolescence exposure, uncertain spare availability, ageing hydraulic performance, and elevated maintenance intervention requirements. We consider this sufficient to support this project allowance and provide a Flexible allowance. We estimate a weighted asset life of 35 years which is mostly driven by the buried infrastructure components.

CIP27.04.13 – Airport Light Fleet Replacements

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€9.4m	5 years	Flexible	N

- 4.41 This project proposes to replace all light vehicles (vehicles with a gross vehicle weight less than 3,500kg) that have reached the end of their economic lifecycle (3-6 years), and add a further 10 vehicles to bring the total fleet to 153 in the period. Dublin Airport states that all light vehicles are maintained in accordance with the required road safety standards and are replaced once they reach the end of their useful economic life. The vehicles are used by operational business units such as airport police, fire service, airport search unit (ASU), airport operations, and asset management.
- 4.42 Dublin Airport confirms that vehicles are scheduled for replacement based on a number of factors including overall mileage, engine run hours, time in service, whole life operating cost, vehicle condition, number of rotating drivers and accumulated vehicle off-road time. We asked Dublin Airport if the asset life methodology is used to develop the replacement plan. It stated that while the asset life methodology is one of the metrics used to generate the fleet replacement plan, it also reflects infrastructure development plans, forecast passenger growth and the need to maintain operational continuity. It notes that such additional factors may require both replacement of existing vehicles and augmentation of the fleet where operational demand increases.
- 4.43 The increase in the number of vehicles seems appropriate given the anticipated increase in activity on the campus in particular due to the introduction of Apron 7 and the north and south apron extensions. As a fit-for-purpose light fleet is necessary to ensure that various airport functions can operate effectively, we have allowed for this project as it is in the interests of airport users. We included a similar allowance as part of CIP2020+, which has been spent by Dublin Airport. We are proposing that the allowance is Flexible.

CIP27.04.14 – Airport Heavy Fleet and Equipment Replacement

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€20m	7 years	Flexible	N
4.44	This project proposes the replacement, optimisation and decarbonisation of Dublin Airport's heavy vehicle fleet. Heavy fleet vehicles include a broad mix of vehicles such as fire tenders, snow and ice equipment (snow ploughs, runway de-icers, snow blowers), airfield pavement sweepers, tractors and support equipment such as hoists, cargo loaders and forklifts.			
4.45	Similar to the light fleet project above, Dublin Airport has stated that the replacement plan is based on more factors than just the vehicle asset life. In the case of the heavy fleet, consideration is also given to compliance with the European Clean Vehicle Directive and the Government's Climate Action Plan. Dublin Airport states that it will acquire EV's where operationally viable and economically advantageous to do so.			
4.46	We provided an allowance for a similar project under CIP2020+, which Dublin Airport has mostly spent. We consider that the heavy vehicle fleet is essential in meeting regulatory obligations under rescue and firefighting services (RFFS), runway friction management and airfield safety. We propose a Flexible allowance and adopt the same asset life of 7 years used for CIP20.01.065.			

CIP27.04.15 – Airport Existing MV Network Upgrades

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€65.7m	20 years	StageGate	N
4.47	The focus of this project is the replacement and upgrade of life expired electrical equipment and associated substation infrastructure. Out of 54 substations, 36 are considered to be life expired. Each life expired substation is proposed to undergo a full renewal, modernisation and compliance upgrade. The scope also includes the replacement of 54 obsolete Ring Main Units (RMUs) and primary MV switchgear, replacement of 20 10kV/400V transformers with modern dry-type equivalents where feasible, and renewal of approximately 10 km of end-of-life paper-insulated MV cabling across the airport campus.			
4.48	We asked Dublin Airport what, if any, efficiency benefits this project would provide. It stated that while there may be some maintenance efficiencies through the replacement of ageing equipment, the primary motivation is operational resilience.			
4.49	We also asked why this project has not been proposed for StageGate, due to the scale and complexity of the project. Dublin Airport said that the project is based on a well-defined scope of renewal works across an existing and well-understood asset base and is better suited to programmed renewal delivery than to a StageGate approach intended to provide flexibility for less fully defined projects.			
4.50	Dublin Airport has provided us with MV O&M service reports, the 2023 MV Masterplan condition survey, and the ABB equipment lifecycle and asset health evidence report. We find that those reports support the need for this project. We consider that failure of the existing MV network would have a detrimental impact on airport operations and we			

therefore propose to include this project. We do not agree with Dublin Airport that this project is not suited to the StageGate process. The IFS assesses that the information provided by Dublin Airport is at a very high-level and the specifications are at an early stage. Given the scale and complexity of the project, and the uncertainty of scope, we propose to include it in the StageGate process.

- 4.51 We estimate a weighted asset life of 20 years which is consistent with previous MV network projects in previous determinations.

CIP27.04.16 – Terminals and Piers Low Voltage (LV) Electrical Upgrade

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€19.9m	20 years	Flexible	N

- 4.52 This project is intended to modernise and replace life-expired Low Voltage (LV) electrical infrastructure across Terminal 1 and associated pier buildings to ensure safe, reliable, and resilient power distribution. Locations include the Terminal 1 energy centre, Terminal 1 basement, pier 2 and pier 2 link, pier 3 link and Terminal 1 suncity. The scope includes replacement of the obsolete LV distribution boards (DBs) with modern DBs with enhanced protection, replacement of deteriorated wiring, containment, and trunking system and replacement of legacy lighting with high-efficiency LED systems.

- 4.53 Dublin Airport stated that while this project is primarily a replacement of aged LV assets, the upgraded equipment will also support improved control, monitoring and predictive maintenance capabilities that are not possible with the current end of life switchgear. Dublin Airport has provided us with an asset management LV asset health review report and the latest service reports on LV Boards to support the need for this project.

- 4.54 We consider that the maintenance and replacement of such equipment is in the interests of Users to ensure operational continuity and reliable power distribution. We propose to allow for the project and make it Flexible. We adopt Dublin Airport's 20-year asset life.

CIP27.04.17 – Primary Standby Power Generation Upgrade

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€28.7m	15 years	StageGate	N

- 4.55 This project proposes to upgrade and expand onsite power generation infrastructure across the airport campus by upgrading existing generators to prime-rated operation and introducing new prime-rated generation across key electrical rings. The scope of works includes the provision of prime rated generation facilities with renewable energy sources, Battery Energy Storage Systems (BESS) and high efficiency Combined Heat and Power (CHP) technologies. The primary focus will be on converting existing standby rated generators to prime rated generation in order to increase capacity and introduce additional prime rated generator capacity to MV rings that do not have any standby generation.

- 4.56 Dublin Airport states that regional network capacity growth does not align with Dublin Airport's forecast electrical demand and that on-site generation will be required to bridge the gap between available import capacity and forecast demand growth. Prime-rated generators are therefore proposed by Dublin Airport because the future operating model is expected to include regular peak-looping operation, potentially for approximately 4–6

hours per day or night, including support for BESS charging and system capacity management. Standby generators are not rated for this regular continuous duty, and therefore prime-rated generation is required.

- 4.57 Dublin Airport states that the current Terminal 2 MV generators have been in service since 2010 and now require significant mid-life rebuilding works. The Terminal 1 MV generators date from 2011, although one replacement generator was installed in 2023 following failure of the previous 2001 generator. Other local generators across the terminals and campus, excluding AGL generators, are LV units intended for emergency event use only.
- 4.58 Dublin Airport has provided additional information which supports the investment in prime rated generators which is driven by the future duty profile rather than by isolated historical overload events. We understand that standby generators are suitable for infrequent emergency operation only and are not designed for sustained daily running. Considering the airport's forecast growth in demand for electricity and the constrained grid import capacity, it will be necessary for Dublin Airport to invest in onsite generation to ensure operational continuity. We consider that this project is in the interest of Users and agree with Dublin Airport to include it in the StageGate process. We adopt the proposed asset life of 15 years.

CIP27.04.18 – Small Energy projects

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€12.6m	15 years	Flexible	N

- 4.59 This project is a continuation of CIP20.02.013 (Small Energy Projects). Works delivered included lighting upgrades and energy-related improvement projects. Dublin Airport has reported the following outcomes from CIP20.02.013: a reduction of 244,203 kWh, or approximately 15%, from lighting works in the T1 and T2 multi-storey car parks, approximately 300,000 kWh or 60% energy savings from a White House HVAC upgrade and Terminal 2 lighting savings of approximately 677,092 kWh, or around 15%. Dublin Airport is also planning a significant energy metering upgrade project for delivery in 2026.
- 4.60 We asked Dublin Airport how energy grant funding will be used to fund this project. In response it states that it has secured the CEF AFIF funding for the DACE (Dublin Airport Campus Electrification) project and has recently applied for IF25 in support of the T2 Geothermal project. Dublin Airport is currently developing a pipeline of grant funds that will potentially match proposed projects. This process has not been finalised and therefore the full list of projects and potential grants is not known yet.
- 4.61 Based on the information that Dublin Airport has provided regarding energy savings from initiatives delivered under CIP20.02.013 we consider that allowing for this project is in the interest of Users and will lead to energy cost savings. We find that this project also aligns with our statutory objectives in respect of sustainability. The project addresses Dublin Airport's obligations under the Climate Action and Low Carbon Development Act and the Energy Efficiency Directive.
- 4.62 Where Dublin Airport's grant application is successful and funding is received, this will be reflected in a cost saving on the project and the net amount will be included when reconciling expenditure at the end of the period. We include the project with a Flexible allowance and adopt a 15-year asset life, consistent with CIP20.02.013.

CIP27.04.19 – Campus Buildings M&E and Life Safety Systems

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€41m	15 years	Flexible	N
4.63	The project is a refurbishment/replacement programme in respect of mechanical, electrical, and Life Safety Systems (LSS) across campus buildings. This project will also provide full sprinkler installation to Terminal 2 Multistorey Car Park (MSCP) and Block C MSCP in Terminal 1, full electrical and LSS upgrades to the Terminal 1 MSCPs, and LSS upgrade to the Terminal 2 MSCP and replace all street lighting cabling across the campus (with the exception of Terminal 2). The scope has been developed following condition and performance assessments, including operational performance data and failure history.			
4.64	Dublin Airport confirms that prioritisation of works is applied through a campus-wide RAG framework, and that the primary drivers for prioritisation are regulatory and statutory compliance, followed by life safety risk exposure, asset condition and remaining life, and operational criticality. Stakeholder requirements are also considered, alongside the asset management value framework of risk, cost, and performance, and opportunities to improve energy efficiency and reduce maintenance burden. The approach aims to ensure that investment is aligned to asset condition, risk, and future masterplan intent, while avoiding over-investment in assets with limited remaining life.			
4.65	We allowed for a similar project as part of CIP2020+, which included LED light fittings and electrical works. Dublin Airport has provided data which demonstrates the level of energy savings it has observed over the previous period, which was supplemented by works delivered under CIP20.02.009 including lighting upgrades in the T1 and T2 multi-storey car parks and in Terminal 2 public areas through retrofit of older fluorescent and related fittings. It further anticipates that early-generation LED replacement will provide performance improvements of approximately 30% over the current installed LED base.			
4.66	As in 2019, we consider this project to be in the interest of Users as it provides for operational continuity and is likely to reduce energy costs. We consider the project also has a building safety element relating to the re-wiring programme as it addresses earthing failures and provides for the renewal of local distribution boards and circuit protection. We include the project as Flexible and retain the 15-year asset life we adopted for the CIP2020+ project.			

CIP27.04.20 – Passenger Boarding Bridges and Fixed Electrical Ground Power Upgrade

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€24.3m	15 years	Flexible	N
4.67	Dublin Airport proposes to deliver a programme of upgrade works for airbridges at Piers 3 and 4, and an FEGP replacement programme at Pier 1, Pier 3 and Pier 4. The project proposes mid-life upgrades to 19 Pier 4 airbridges in addition to autonomous docking features to enable the airbridges to meet any future autonomous/AI aided docking functionality. Pier 3 works will also include the implementation of autonomous docking features in addition to complete cab and electrical controls replacements, replacement steel transition ramps and replacement tunnels rollers for the 8 airbridges. The FEGP element consists of standardising existing FEGP cables across Piers 1,3 and 4 (65 in total).			

- 4.68 The IFS has identified several inefficiencies relating to the scope of the project and has made several changes which are detailed in full in the IFS report. After the amendments are made to the proposed scope, we note the IFS considers that the broad scope of works will extend the asset life of existing infrastructure without the need for a full renewal. We have previously allowed for ongoing maintenance works on airbridges to ensure the asset life and operability of the airbridges. We therefore find that the project (following amendments by the IFS) is in the interest of Users and propose to include it with a Flexible allowance. We retain the 15-year asset life used for CIP20.02.004.

CIP27.04.21 – Lifts and Escalators Modernisation Programme

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€33.7m	20 years	Flexible	N

- 4.69 This project will provide a phased modernisation of lifts, escalators and associated control infrastructure across Terminals 1 and 2. It includes common lift controller replacement, remote monitoring and telemetry, drive and control system, lift car refurbishment, safety and compliance upgrades, goods lift enhancements, escalator controller standardisation, energy efficiency improvements and documentation and asset data capture.
- 4.70 We allowed for a similar project in CIP2020+, and Dublin Airport has used almost all of the allowance. In the Original 2019 Determination we stated that the project was in the interest of Users, as it would improve reliability and operability and prevent increased maintenance costs associated with ageing assets. The recently installed/modernised units will not be included within the scope of this project.
- 4.71 We again propose a Flexible allowance and adopt the same 20-year asset life.

CIP27.04.22 – Potable and Foul Water Upgrades

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€15.5m	25 years	Flexible	N

- 4.72 This project comprises a programme of works to support the staged renewal and upgrade of the airport's potable and foul networks. The networks include assets that are between 15 and 50 or more years old. Key deliverables include campus potable water mains replacement and diversions, foul water rerouting and relining, smart metering and leak detection installation, replacement of end-of-life domestic water infrastructure, validation of as-built records, hydraulic modelling and opportunity co-ordination.
- 4.73 Dublin Airport has confirmed that a significant element of CIP.20.02.006 was deferred due to changing Uisce Éireann pollution-control requirements which required the funds to be re-distributed. The project remains at design stage and includes replacement of a Terminal 2 cold water booster pump, which is now being carried forward into CIP2027. We understand that a large proportion of the CIP20.02.006 scope is now carried forward to CIP27.04.22 including the potable water resilience and replacement requirements.
- 4.74 We note that CIP20.02.006 was mostly undelivered due to unanticipated requirements on Apron 5H, and to a lesser extent delays incurred with the replacement of Terminal 1 potable water tanks which are linked to the Terminal 1 façade and Level 4 and 5 upgrade scope

(which has not yet commenced due to planning dependencies).

- 4.75 We consider that the project remains in the interests of Users, as the works aim to reduce the risk of asset failure, and/or forestall increasing maintenance costs. Dublin Airport also expects this investment to provide both maintenance and efficiency benefits. It states that the watermain repairs and upgrades were developed with efficiency and resilience in mind. When the upgrades are delivered, the cumulative effect of reducing leaks, improving control and future-proofing the network is expected to result in lower avoidable consumption of both water and power.
- 4.76 We are again proposing a Flexible allowance, although there may be merit in making this project a Deliverable in the Final Determination, given the previous non-delivery.

CIP27.04.23 – Terminals and Piers M&E and Life Safety Systems

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€36.3m	13 years	Flexible	N
4.77	This project addresses both the modernisation and standardisation of Life Safety Systems and infrastructure across Terminal 1, Terminal 2, associated piers, links and operational buildings. The scope includes the fire alarm system replacement, emergency lighting upgrade, Uninterruptible Power Supply (UPS) replacement, PAVA system modernisation (T1 and T2), sprinkler and suppression system replacement, centralised monitoring and replacement of Terminal 2 fire dampers.			
4.78	This is a rolling programme of upgrade and maintenance of Life Safety Systems. A similar project, CIP20.02.007, delivered a package of life safety upgrades including replacement of all Terminal 2 fire alarm panels, replacement of over 80 high-level smoke dampers in Terminal 1, UPS replacements in Terminal 1 and Terminal 2, including support for new passenger screening equipment and fire alarm, emergency lighting and sprinkler upgrades in Terminal 1 security areas. The areas identified for replacement in this regulatory period include Terminal 1 west, Terminal 1 street and the Terminal 1 reclaim hall. Further works are planned in the Terminal 1 basement as a standard-life safety and building services upgrade, on Terminal 1 level 4, within the sun city area, and in the remaining high-level smoke damper scope across the Terminal 1 mezzanine that was not fully captured under prior CIP2020 projects.			
4.79	As with previous versions of this project, we consider that ongoing phased capital intervention in Life Safety Systems is in the interest of Users as it ensures that the LSS systems remain compliant with building and fire safety regulations, while also forestalling increased maintenance costs. Dublin Airport expects that in the medium term, unplanned repair expenditure and cost volatility should reduce, improving budget predictability rather than materially lowering baseline Opex. It estimates that planned maintenance costs will remain broadly consistent due to routine inspection and testing. We estimate a weighted average asset life of 13 years and assign a Flexible allowance.			

CIP27.04.24 – Terminals and Piers HVAC Upgrade

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€13.2m	20 years	Flexible	N

- 4.80 The focus of this project is the phased renewal of the airport's heating, ventilation, and air conditioning (HVAC) systems, with specific focus on assets exceeding 30 years in operation and Building Management System (BMS) infrastructure that is over 15 years old. This project will target areas within Terminal 1 that have not been upgraded during the last number of years, including Pier 2 and Pier 2 Link, Pier 3 Link, Terminal West, Terminal 1 basement, primary Terminal 2 and Terminal 1 end of life chillers.
- 4.81 In 2019, we allowed for CIP20.02.008 which delivered replacement chillers, pumps and upgrades to 35 primary AHUs across Terminal 1. A recent delivery element was Terminal 1 work package 1, following upgrade of the primary chillers and associated pipework. This included twelve primary heating pumps installed across six circuits, together with six chilled-water pumps across three sets in the Level 4 plantroom. Estimated energy savings are approximately 268,000 kWh per annum based on 5,000 operating hours, equivalent to around 30% compared with the previous pumps. Dublin Airport refers to OEM market guidelines which indicate that energy savings of approximately 40% can be achieved from replacement of pumps together with variable speed drives and associated modern controls.
- 4.82 Dublin Airport has also provided the Lifecycle Cost Analysis- Economic Intervention charts relating to various elements of this project such as boilers, AHUs, chillers, dampers, fan coil units which includes assets that were installed between 2000-2010 which supports its targeted upgrade and replacement approach. In relation to the BMS upgrade, it confirms that the current manufacturer has ceased manufacturing the range of BMS controllers used in parts of Terminal 2, and Pier 1 which means there is a lack of ongoing spare-part manufacture and an increased dependence on older software and Windows-based support environments.
- 4.83 As in 2019, we consider this project to be in the interest of Users as it will ensure an appropriate level of comfort and safety for passengers and staff in terms of air and water temperature, as well as avoiding escalated maintenance costs from failed components impacting other parts of the systems. We note that Dublin Airport has also reported considerable energy savings arising from HVAC interventions in the previous period. We are proposing that the allowance is Flexible and retain the asset life of 20 years as proposed by Dublin Airport, and in line with our decisions in both 2019 and 2022.

CIP27.04.25 – Asset Management Monitoring and Control Systems

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€7.3m	10 years	Flexible	N

- 4.84 The primary objective of this project is to support the ongoing development of an integrated, airport wide asset monitoring and control platform. It focuses on integrating with BMS and supervisory control to cover all current and future assets that impact operational service levels, safety, or quality. The objective of the project is to enable data-driven asset management across all critical infrastructure to facilitate better planning of work and improved uptime performance for monitored critical assets. The project is proposed to support Dublin Airport's ISO 55001 recertification pathway, including the enhanced emphasis in the 2024 standard on the use of performance information and predictive approaches.
- 4.85 We asked Dublin Airport how this project interacts with CIP20.02.008 (Terminal Buildings HVAC Upgrade). It states that a significant element of the Terminal 1 BMS has been

upgraded, with approximately 40 of 105 outstations replaced, including the original 8 bay Terminal 1 building, 6 bay and Terminal west and Pier 3 as part of CIP.20.02.010. Remaining areas, including Pier 1, T1X and T1 street, are included within CIP27.04.25. The current project therefore proposes to complete the remaining areas and progress the Terminal 2 upgrades that were not delivered under CIP2020.

- 4.86 We also asked Dublin Airport how the proposed SCADA system interacts with CIP20.02.001 (Medium Voltage (MV) Electrical Network). It notes that the three airport MV SCADA systems were upgraded and merged in 2020/2021, providing a supported system through to approximately 2030. The now proposed MV SCADA system is retained for loss-of-mains detection and associated control functionality. It will remain separate from any future airport power microgrid control system so that reliability is not compromised by introducing unnecessary additional complexity into a single integrated SCADA platform.
- 4.87 We note that this investment is intended to expand asset monitoring and improve fault visibility. We are satisfied there is no duplication of scope with other projects delivered under CIP2020+ and consider the expected operational improvements will ultimately be to the benefit of Users. We include the project as Flexible.

CIP27.04.26 – BHS Terminal 2 Critical Asset Re-Life programme

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€65.2m	20 years	StageGate	N

- 4.88 This project focuses on delivering a mid-life upgrade to mechanical, electrical, control and automation assets, within the Terminal 2 Baggage Handling System (BHS). Dublin Airport has identified a targeted suite of assets which includes carousels motor, drive and chain upgrades, security and fire door replacement, switchgear in BHS controls, departures collector belts replacement, tilt tray sorter upgrade. Dublin Airport states that the primary driver for this programme is reliability rather than direct energy use reduction. It expects maintenance benefits to materialise mainly through reduced faults, improved supportability and more effective planned maintenance.
- 4.89 Dublin Airport states that the Terminal 2 Baggage Handling System is now 16 years in operation, and is supporting significantly higher passenger and baggage volumes than it was originally designed for. The increased in passenger numbers has led to near-continuous system operation, reduced access windows for planned maintenance and inspection and accelerated wear across mechanical, electrical, and control components. It has provided us with a list of control parts that are currently being phased out, discontinued, and deemed to be at the end-of-life cycle. In addition, it notes that OEM support is reducing, and the quality of equipment is no longer to the same standards as the original T1 OEM equipment.
- 4.90 We note that 16 years appears a relatively short asset life for some of the assets which Dublin Airport is proposing to replace. The motivation to replace the assets is driven by repeated reliance on reactive intervention to maintain performance, rather than planned, preventative activity. We do note the importance of the BHS to operations but are not entirely convinced by the need for the scale of the proposed intervention during this CIP period especially given the level of proposed investment in baggage systems in the period. Given the criticality of the system and the sub-optimal approach to continued maintenance rather than planned intervention, and also in the context of our approach of making a top-down adjustment to the asset care envelope, we are proposing to allow for this project but

will consider it further ahead of the Final Determination.

- 4.91 We consider this project suitable for inclusion in the StageGate process given the scale of investment, the scope as reviewed by the IFS is at a high level and the degree of cost escalation that has been incurred on CIP2020+ baggage projects. We note this is consistent with both Dublin Airport and IATA's positions. We adopt the 20-year asset life recommended by the IFS.

CIP27.04.27 – Baggage Handling System Efficiency and Resilience Upgrades

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€15.9m	14 years	Flexible	N

- 4.92 This project provides for a programme of BHS resilience and renewal works, with a particular focus on system upgrade, element replacements, improved monitoring, and renewal of critical identification and control systems. There is provision for optical character recognition (OCR) technology, which will reduce reliance on Baggage source messages (BSMs), which aims to ensure uninterrupted baggage sortation and improved operational resilience. The scope also includes rapid roller door replacement at Terminal 1 and Terminal 2, a Terminal 2 Departures and Arrivals Out of Gauge lift replacement, and airport baggage handling controls and equipment asset monitoring.
- 4.93 We asked Dublin Airport to demonstrate that replacement of these assets during CIP27 is in line with the 'economic intervention' approach to Asset Care. It responded that in the environment in which the BHS operates, degradation is accelerated beyond standard industrial assumptions. It suggests that preventive maintenance alone cannot sustain reliability indefinitely and failure risk increases disproportionately after mid-life, and obsolescence increasingly limits repair options. Dublin Airport states that the asset care rationale is supported by information sources including Vanderlande obsolescence management guidance and the IATA Baggage Operations Manual. It also provided us with its BHS components obsolescence register.
- 4.94 We consider that this project is likely required to provide resilience and efficiencies to the BHS. We note that the scope is replacing key operational infrastructure such as the Out of Gauge (OOG) lifts which have been in use since the opening of Terminal 2. There are new roller door products now available with higher speeds that are expected to reduce the reactive call on the doors in both terminals. The OCR provides resilience for loss of IT systems. We therefore find this project to be in the interests of Users, and we include it with a Flexible allowance. We have estimated a weighted asset life of 14 years based on the subcomponents which we propose to use instead of Dublin Airport's 20-year assumption.

CIP27.04.28 – Baggage Handling System Asset Replacements and Upgrades

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€57.2m	15 years	StageGate	N

- 4.95 This project proposes the renewal, upgrade and targeted enhancement of the Terminal 1 BHS which has been in operation for 27 years. It includes the replacement of the Terminal 1 BHS and Check in system, and added routing flexibility through a new connection to Area

14 from Terminal 1 8-Bay and 6-Bay.

- 4.96 Dublin Airport expects the project to lead to a reduction in maintenance costs from a combination of fewer reactive interventions, improved supportability and modern system architecture. It also notes that the current link to Area 14 is a single point of failure, and by adding a secondary link, the new make-up carousel could be better utilized to improve congestion and safety in the baggage halls. Dublin Airport is proposing this project in place of a full optimisation and refurbishment of the Terminal 1 check in area (which was presented in the draft CIP27).
- 4.97 We consider this project to be in the interest of Users as it will maintain the operational capability of the Terminal 1 baggage operations until such time that a decision is made on the long-term future of Terminal 1. Given the age of the Terminal 1 assets and that the BHS is a key airport system we propose to allow for this project. We note the proposed link to Area 14 provides resilience against a single point of failure. We agree with Dublin Airport to include this project in the StageGate process and note the IFS' comments that the project still needs considerable additional planning and design development.

CIP27.04.29 – Terminal Operational Improvements

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€19.8m	10 years	Flexible	N

- 4.98 This project particularly focuses on refurbishment of finishes and improvements within the terminals and piers. The scope of works is based on a review undertaken by Dublin Airport teams to identify both passenger facing areas and selected back of house areas, where architectural finishes have degraded and require refreshment, repair or replacement. Areas have also been identified to provide passenger enhancements such as increased Flight information Displays (FIDS), hydration hubs and smart bin provision.
- 4.99 Dublin Airport expects the project to generate efficiencies by avoiding larger-scale partial closures required for major works, minimising operational disruptions, and avoiding the escalation of maintenance expenses over time. It expects investments such as the smart bin provision to increase efficiency as it will notify teams when the bin is full rather than requiring repeated inspection.
- 4.100 We consider this project is in the interests of airport Users to reduce the risk of asset failure, and/or forestall increasing maintenance costs. We also expect it will enhance the passenger experience. We are proposing that the allowance is Flexible.

5. Security

CIP27.05.01 – Intrusion Detection Systems

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€13.4m	10 years	Flexible	N

- 5.1 This is a rollover project from CIP.20.06.015 (Intrusion Detection System) which set out to provide an automated intrusion detection system on the boundary of the Critical Part Security Restricted Area (CPSRA) through the installation of cameras directed by ground-based radar. Dublin Airport is proposing a perimeter fence with a second line of integrated intrusion detection sensors and systems that are operable regardless of the weather or light quality by the installation of 17 intrusion detection radar type devices along the perimeter fence with 21 pan tilt zoom cameras. The assets will be fully integrated with Dublin Airport's existing security architecture.
- 5.2 In 2019, we allowed for this project noting that it was in the interests of Users. We again propose to include this project with a Flexible allowance and adopt the 10-year asset life as assessed by the IFS.

CIP27.05.02 – Aviation Security Training Organisation (ASTO) Relocation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€27.3m	20 years	StageGate	Y

- 5.3 This project is a rollover from CIP20.06.022 (Aviation Security Training Organisation Upgrade and Expansion). The allowance for the original project was used to upgrade the existing facility, which was accommodated across several sites. These sites have now been either earmarked for demolition or repurposed to facilitate the proposed developments under CIP27, such as Pier 1 East and Pier 5. This project now proposes to relocate the Aviation Security Training Organisation (ASTO) to Castlemoate House as per the original CIP2020+ scope.
- 5.4 The scope includes upgrade works to Castlemoate House, the construction of a two-storey building with an estimated size of 1500 m² and car parking rehabilitation and landscaping. The new facility will include screening equipment, computer-based training systems, lecture rooms, examination rooms, and welfare facilities. Dublin Airport also intends to safeguard the site for an additional two-storey building of similar size in the future. As Castlemoate House is a listed structure, Dublin Airport is limited in the renovation and expansion works it can undertake and is therefore not considered a long-term viable option for the anticipated security workforce.
- 5.5 As we noted in the Original 2019 Determination, it is in the interests of Users, as well as the interest of promoting security, to ensure that Dublin Airport provides fit-for-purpose training facilities. The IFS states that it could not evaluate the facility sizing from the information provided by Dublin Airport as it did not include a demand schedule/sizing calculation. We consider that this project is therefore more suited to the StageGate process than the Flexible treatment proposed by Dublin Airport. We agree that it should be included as a triggered allowance and propose to include the cost of the security equipment from CIP27.05.05 (Security Operations Systems and Equipment) within the

trigger amount to ensure the equipment is remunerated in line with the facility.

CIP27.05.03 – Damage by Vehicle Risk Mitigation Programme

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€15m	20 years	StageGate	Y

- 5.6 This project is a rollover from CIP20.06.046 (Terminal Kerb Security Mitigation) and proposes glazing and frame replacement mitigations on both levels in T1 (arrivals and departures). The project also includes a structural survey of Terminal 1, and a High-Level Bomb Blast Analysis (BBA) to determine the level of risk on the existing structure from a blast load on the new blast resistant façade. Dublin Airport confirms that the bollard component from the CIP2020+ scope has been advanced and is expected to be completed by the end of the current regulatory period.
- 5.7 In 2022, we concluded that this project is in the interests of Users, and we again propose to allow for it in the StageGate process. The IFS notes that Dublin Airport has not addressed the implementation of vehicle mitigation measures to prevent unauthorised vehicles entering the existing pickup and set down roads. By including the project in the StageGate process we note that Dublin Airport can explore these measures further while consulting with Users.

CIP27.05.04 – Access Control System Replacement

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€16.9m	7 years	Flexible	N

- 5.8 Under this project, the existing access control system will be replaced with a new integrated management system for all service elements and supporting infrastructure. This includes replacement of the access control system for temporary vehicle passes, visitor passes, security training notification and automated access enforcement through integrations with HR applications services. The scope also includes supporting infrastructure, such as physical access readers on the doors and car parks, data cabling and applications.
- 5.9 The current access control system has been in operation since 2002 and Dublin Airport reports that vendors have recently issued several end-of-support notices requiring at times, urgent replacement projects to ensure continued operation of the service.
- 5.10 We consider this project will support the reliable operation of the access control system and reduce the need for ad-hoc maintenance and replacements. We propose to allow it as Flexible and estimate a weighted asset life of 7 years based on the IFS' assessment of the individual components.

CIP27.05.05 – Security Operations Systems and Equipment

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€43.6m	7 years	Flexible	N

- 5.11 The project aims to provide security screening systems and supplemental airport police

and security operations equipment. This project also includes security equipment, which is required to support expansion and relocation projects, such as CBP extension, consolidated security and screening centre, OCTB refurbishment for Platinum Services relocation, Gate Post 4 relocation, new MRO Gate Post, and security training centre (ASTO) relocation. A combined total of approximately 3,600 units of security equipment will be delivered from this project. 1,500 parts will be delivered to existing checkpoints while the remaining 2,100 parts will be delivered to new CIP27 developments.

- 5.12 The equipment to be replaced includes Liquid Explosive Detection (LEDs) systems, Explosive Threat Detection (ETD) systems, Handheld Metal Detectors (HMD), Walk through metal detectors (WTMD), mobile X-rays systems and handheld tablets. Additional equipment includes handheld mobile radios, ruggedised tablets used for vehicle and airside inspections, Tetra radio handsets and shoe scanners. We note that the additional equipment listed are operational rather than regulatory requirements.
- 5.13 We consider that while investment in detection technologies such as shoe scanners, handheld metal detectors or radio handsets is not expressly required by regulation, we consider it is in the interest of Users that Dublin Airport continues to invest in such equipment. We propose to allow for this project with a Flexible allowance. While we do not trigger this particular project, almost half of the total costs are included in other trigger projects including CIP27.05.02 (Aviation Security Training Organisation Relocation), CIP27.02.15 (Consolidated Security and Screening Centre), CIP27.02.04 (Terminal 2 CBP and Transfer Extension), CIP27.02.02B (MRO Relocation), CIP27.02.07 (Gate Post 4 Relocation), CIP27.02.15 (Consolidated Security and Screening Centre). This ensures that the security equipment is remunerated as the relevant parent project progresses. We adopt the 7-year asset life proposed in Dublin Airport's price cap model and which is consistent with CIP.20.06.041- Security Screening Equipment in CIP2020.

CIP27.05.06 – HBS System Upgrade

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€3.7m	5 years	StageGate	N

- 5.14 This project aims to upgrade the existing Hold Baggage Screening system to comply with the anticipated Standard 3.2 regulatory requirements should they come into effect in the next period.
- 5.15 We note that even if the 3.2 Standard 3.2 deadline does not come into effect during the regulatory period, Dublin Airport may have to carry out preparatory works to meet a deadline in 2032/2033. We note this was the situation with the main standard 3 transition.
- 5.16 Although the cost is considerably lower than other StageGate projects, we propose to include it in the StageGate process as this will facilitate engagement with Users when more information about Standard 3.2 becomes available. We note the IFS also has some concerns with Dublin Airport's mitigation strategies for Standard 3.2.

CIP27.05.07 – VCP 11 and 32 Building Replacement

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€9.7m	20 years	Flexible	N

- 5.17 This project proposes to replace the existing gate post buildings at the Vehicle Control Posts (VCP's) 11 and 32. The required security equipment for VCP 32, including two new C3 lanes, is provided for in CIP27.05.05 (Security Operations Systems and Equipment). VCP 11 will be replaced with a permanent structure and is used for VIP pedestrian movements to/from the West Apron. VCP 32 will be replaced with a single storey building gate post inclusive of a Persons Other Than Passengers (POTP) screening area and a dedicated access control area. Vehicular traffic ceased at VCP 32 in 2021 and is now used only for POTP.
- 5.18 We note that VCP 32 is a porta-cabin that was built in 2012 as a temporary solution for airline service access to this area of the CPSRA. The intended lifespan of the porta-cabin was originally 3- 5 years, which Dublin Airport has extended 3 times. The cabin now incurs excessive maintenance costs, leaks from the roof have caused electrical damage in the screening areas and the existing floor cannot handle the move to increasingly heavier screening systems. We consider that it is therefore necessary to carry out the necessary upgrade works as proposed. We also consider it is inefficient to Users if Dublin Airport continues to incur such excessive maintenance costs especially at the risk of screening equipment. We agree with Dublin Airport's proposal to include this project as Flexible, and we retain the 20-year asset life.

CIP27.05.08 – Terminal 2 T2 Staff Screening Expansion

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€1.1m	15 years	Flexible	N

- 5.19 This project intends to add capacity to the staff screening checkpoints by adding an additional screening lane at T2. The new lane will be a 7 metre C1 standard lane. This project will deliver the expansion works while the security screening equipment for this project will be provided by CIP27.05.05 (Security Operations Systems and Equipment).
- 5.20 Dublin Airport states that the additional lane is driven by space constraints at the divest end of the screening lanes which has negatively impacted overall process flow and lane performance. It reports negative feedback from airport users (including POTP and flight crews) regarding delays when attempting to access the CPSRA. We proposed to allow for this project considering it is likely to improve User experience. We adopt an asset life of 15 years which is consistent with other checkpoint works in the terminals, as per CIP2020+. As outlined in Section 12, we also propose to introduce queue time targets in respect of staff search.

CIP27.05.09 – Remote Screening Centre

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
0	-	-	-

- 5.21 This project proposes a remote cabin baggage screening centre on the T1 mezzanine level. The project proposes to deliver fit-out and internal finishes to an area with capacity for 60 screening positions, to replace the current in-lane screening model.
- 5.22 There appears to be some inconsistency/confusion as to what the driver/intended objective of this project is, and whether a remote screening model is the right approach, given experiences at other airports. As well as throughput, one of the intended benefits of a

remote screening model would be to enhance productivity, such as through specialisation of ASU officers. However, as Dublin Airport has itself separately noted, there are drawbacks to that approach, such as challenges in managing breaks. Dublin Airport's planning assumption is that 60 screening positions will be required, which is fewer than the current total number of in-lane positions, as a result of productivity/throughput improvements. However, Dublin Airport fails to take account of this in its Opex assessment in the CIP27 project sheet, instead suggesting that this project will actually increase Opex.

5.23 Although not stated in the project sheet, in the RFI process Dublin Airport clarified that a trial is needed to assess whether a remote screening model would be an improvement on the current in-lane screening model. No information is currently available in that regard. The scope of this project, however, includes the full built remote screening centre. There is also a risk in terms of future-proofing for potential required capacity, given that the facility would be limited to 60 positions, and separately (and on the other hand) there is the prospect that APIDS could lead to a major step change in screening workload and so this facility may not be needed, at least of the scope proposed here.

5.24 We are willing to consider the project further ahead of the Final Determination should any submissions in respect of same warrant further consideration. However, it appears to us that making an allowance for this project is premature, in the absence of any evidence as to whether this project will provide a benefit, and given inconsistent information/views from Dublin Airport in that regard. We suggest that, if such a trial demonstrates the benefits of remote screening, Dublin Airport could then progress the project using the flexibility in the security group allowance, and/or if necessary consult on increasing that allowance to include the project, once it has actually been assessed. We therefore do not propose to make an allowance for this project.

CIP27.05.10 – Security Operations Refurbishments

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€9.9m	10 years	Flexible	N

5.25 Dublin Airport proposes to refurbish Gate Posts 1B and 9, breakrooms, washrooms, locker rooms, and general areas in both terminals, central search in T1 and T2 and dog training facilities. The scope of works includes medium-level refurbishment of Gate Post 1B (280 m²) and Gate Post 9 (280 m²), light-level refurbishment of security operations facilities, including painting and repair to walls and ceilings, replacement of flooring and significant refurbishment of the existing dog training facilities. The areas in scope relate to security staff including central search and ASU staff facilities.

5.26 We consider that these investments will prolong the lifespan of existing areas and facilities thus negating the need for more costly interventions in future. We include it as Flexible and assign a 10-year asset life.

CIP27.05.11 – Security Innovation and Technology

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€7m	5 years	Flexible	N

5.27 This project proposes to introduce a series of technologies which aim to maximise

passenger throughput at central search. This project will explore a number of measures including: upgrading the existing passenger measurement system, introduction of a virtual queuing system, using Gigaplex to upgrade existing remote screening capabilities, implementation of AI assisted cabin baggage processing, and Threat Image Projection (TIP) trials for Computed Tomography (CT) image testing.

- 5.28 Dublin Airport intends to commence trials on the proposed technologies in 2027. It plans to start with threat image protection and passenger measurement systems trials in 2027. AI-assisted cabin baggage processing and passenger virtual queuing systems will not be available until 2028.
- 5.29 We consider that it is in the interest of Users for Dublin Airport to continue to innovate and explore technologies which may lead to improved throughput, which may include but not necessarily be limited to the measures listed here. Such measures may also support achieving the throughput improvements outlined in the draft CEPA report. We include a Flexible allowance but maintain an asset life of 5 years in line with other IT projects.

6. IT

General Overview

- 6.1 We propose to take a primarily top-down approach to the IT envelope, as we have in previous determinations. In the IFS draft report, it considers that while the scope descriptions are at a very high-level, the project scopes should meet the stated objectives relatively efficiently. The IFS has not been able to assess the costs of the IT projects in a similar way as for other projects because the cost plans provided by Dublin Airport had very limited information on how the costs have been estimated.
- 6.2 The IFS has therefore undertaken a top-down approach to evaluating the IT group. It assesses that the Dublin Airport proposed level of Capex for the IT project group is reasonable. The assessment is based on Comparison of Dublin Airport's historical IT expenditure with a global airport benchmark (SITA), analysis of the IT group composition in CIP2020+ vs CIP27, and comparison of the IT Capex plan with Heathrow Airport. The approach is detailed in Section 8 of the IFS draft report.
- 6.3 We are proposing to allow for all IT projects proposed by Dublin Airport and in each case, we assign a flexible allowance. We retain the asset lives as proposed by Dublin Airport and find that they align with similar projects in CIP2020+. We have treated the IT projects similar to all other groupings when considering the need/ benefit of each and have engaged with Dublin Airport where queries relating to the projects arose.
- 6.4 The submissions on IT projects mostly focused on the potential for duplication/competition between Dublin Airport's digital investments and airline led digital services (Aer Lingus/IAG) and concerns about the overall cost efficiency of the IT envelope (Ryanair). In response to Aer Lingus, we note that the IT envelope allows Dublin Airport the flexibility to work collaboratively with Aer Lingus and other airlines to develop a solution that works efficiently for all parties. In response to Ryanair, we refer to the efficiency analysis carried out by the IFS and note that the IT envelope is one area where Dublin Airport has recorded little underspend against the CIP2020+ allowances.
- 6.5 Dublin Airport is proposing significant investment in new and enhanced IT equipment and systems over the period, which should facilitate efficiencies and enhanced productivity in a range of different Opex lines (such as airside operations, and maintenance). In some cases, the projects allow for improved commercial performance (eg retail) also. As with asset care, there is generally limited evidence that this has been reflected in Dublin Airport's Opex and/or commercial revenue forecasts. In some cases it is even suggested that these projects will instead erode productivity through increasing Opex. We have sought to balance this in our Opex and commercial forecasts, as outlined in sections 7 and 8.
- 6.6 Dublin Airport states that it has moved towards a hybrid IT model, combining Capex investment to enable core capability with Opex based delivery for enterprise software, cloud platforms, cyber security services, data and digital passenger solutions, where value is realised through ongoing subscription and managed services rather than standalone assets. It states that it has reflected this in CIP27 which integrates forecast operational expenditure alongside capital investment, providing a view of the long-term cost of operating, maintaining and securing modern IT systems.

CIP27.06.01 – Airport Passenger Journey

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€10.5m	5 years	Flexible	N

- 6.7 The project seeks to provide a refresh and expansion of Common Use Self Service (CUSS) and Common Use Passenger Processing (CUPPS), which are deemed to be approaching the end of their life cycle. According to Dublin Airport, the end-of-life assessment is based on ageing hardware and operating systems which are increasingly unsupported. This is in addition to the vendor contract expiring in November 2026.
- 6.8 Dublin Airport states that the equipment will integrate with airline departure control systems (DCS) and airline applications, but it is also working closely with all airlines to ensure its technology aligns with their individual digital strategies. We consider that the project will enhance accessibility and improve assistance for PRM passengers.

CIP27.06.02 – Digital Passenger Experience

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€8.6m	5 years	Flexible	N

- 6.9 Through this project, Dublin Airport intends to build on its existing mobile and web platforms. It aims to deliver a programme of enhancements across Business to Consumer (B2C) digital channels focused on personalisation, real time information and a seamless user experience. It aims to establish digital relationships with non-Irish passengers on both their arrival and return journeys.

CIP27.06.03 – Airfield Technology

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€10m	7 years	Flexible	N

- 6.10 This project encompasses the lifecycle replacement of operational systems such as the airport operations systems (AOS), advanced visual docking guidance system (A-VGDS), airfield visual display (AVD) and the associated integration platform. The project proposes to deliver improved operations, improved aircraft turnaround performance, compliance with SES regulations, as well as the rollout of smart apron technologies across 50 stands.
- 6.11 A key driver of this project is compliance with the Single European Sky ATM research (SESAR) framework over 2027-2031. We asked Dublin Airport about the level of SESAR funding it is eligible for and if the funding (or part thereof) would be used for this project. In response, Dublin Airport confirmed eligibility for 50% funding and that it will apply for SESAR funding. Should Dublin Airport be successful in receiving SESAR funding, this will provide for a net saving when reconciling expenditure in at the end of the period.

CIP27.06.04 – IT innovation and AI

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€7m	5 years	Flexible	N
6.12	This project aims to trial and implement emerging technologies that enhance the digital passenger experience and operational efficiency. The project will include trials and phased rollouts of AI, Biometrics, Augmented and Virtual Reality, Robotics and other next generation technologies. This project will also support value scoping studies for infrastructure concepts such as vertiports, remote terminals and innovation incubators.			
6.13	This project builds on CIP.20.05.020 (Innovation and AI Investment) from CIP2020+, which was used for the following:			
	• AI at Passenger screening • APIDS (Automated Prohibited Item Detection Solution) uses AI to analyse the contents of Cabin Bags from the C3 images. • Beacons have been trialled in conjunction with the Airport App, allowing targeted location-based messaging to customers. • AI Chatbots and WhatsApp messaging support passengers on the day of travel, • AR wayfinding solution is being trialled • AI and sensors are used in Smart Bathroom trials • Engaging with airlines on Smart Stand trials including using CCTV analytics to improve turnaround times, AI foreign object detection on the Apron and Remote Airbridge automation.			

CIP27.06.05 – Sustainability (Digitalisation and Reporting)

	Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
	€6.5m	5 years	Flexible	N
6.14	The aim of this project is to create a centralised digital platform capable of capturing data across Environmental, Social and Governance (ESG) domains, in addition to the digitalisation of mandated ESG documentation which will enable automated third-party carbon emissions reporting. This project aims to address data collection requirements under the Corporate Sustainability Reporting Directive (CSRD).			
6.15	We note the importance of data processes and tools in meeting the requirements of both the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). However, it is also necessary to provide sufficient controls to facilitate auditing and including non-financial information in annual reports.			
6.16	We asked Dublin Airport whether there has been engagement with airlines regarding the integration with airline systems to acquire and report scope 3 carbon emissions data for Dublin Airport and how this project contributes to Dublin Airports Net Zero 2050 commitments. Dublin Airport states that engagement is ongoing on a current ESG Oracle EPM project regarding collection and automation of scope 3 data from airlines. Regarding Net Zero 2050 commitments, CIP27.06.05 aims to support Dublin Airport's Net Zero 2050 goals by digitizing & consolidating sustainability data thus enabling reporting and analytics			

to help minimise waste, improve efficiency and support more sustainable long-term operating practices across the organisation.

CIP27.06.06 – Commercial Technology Upgrades

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€6.5m	7 years	Flexible	N

6.17 This project involves the migration of the retail enterprise resource planning (ERP) platform to the cloud, consolidation of e-commerce systems, full integration with Stripe for payment processing, and the deployment of a next generation lounge management system.

6.18 Dublin Airport expects the move to a single e-commerce platform to eventually generate operational savings through platform consolidation, reduced duplication, simplified maintenance and compliance activity, and the retirement of legacy booking systems.

CIP27.06.07 – Operational Devices

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€9.9m	5 years	Flexible	N

6.19 This project involves the upgrade of operational devices used across Dublin Airport. This includes workstations, laptops, mobile devices, handheld scanners, telephone and radio systems, digital signage and meeting room technology which are all considered critical to operations.

CIP27.06.08– Cyber Security and Cyber Resilience

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€10m	5 years	Flexible	N

6.20 This project is proposed to protect both Information Technology (IT) and Operational Technology (OT) from potential cyber-attacks. This includes the upgrade of cyber security operations centre (CSOC) enhancements and transfer to a next generation Security Information and Event Management (SIEM) platform in addition to cyber resilience and zero trust implementation by deployment of advanced security technologies.

CIP27.06.09 – Operational Reliability (Safety, Security and Compliance)

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€22.5m	7 years	Flexible	N

6.21 The focus of this project is on lifecycle upgrades and enhancements across baggage systems, CCTV, asset maintenance and GIS platforms, queue management and access control, airside technical safety, passenger boarding and C3 screening systems, service recovery systems, training and compliance platforms, and mechanical services. The scope also includes the introduction of drone detection, robotics for perimeter inspection and

service recovery systems for added protection in the event of cyber incidents.

CIP27.06.10 – Networks and Infrastructure

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
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€17.6m

7 years

Flexible

N

- 6.22 This project is intended to ensure that all core, access, and edge network components remain within their supported lifecycle. Dublin Airport notes that as critical network hardware approaches end of life, there is increased risk of failure, reduced performance and declining vendor support. Included in the scope of this project is a full lifecycle renewal and enhancement of network infrastructure such as access layer network switches, core and edge switching, firewalls, routers and load balancers, wireless infrastructure, network monitoring platform, cabling and communications rooms.
- 6.23 An asset's useful life is based on Dublin Airport's network lifecycle policy and confirmed vendor end-of-support timelines. The proposed investment aims to ensure that network infrastructure remains fully supported, secure and resilient in line with Dublin Airport's asset management and regulatory obligations.

CIP27.06.11 – Servers and Storage

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
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€8.3m

5 years

Flexible

N

- 6.24 This project is proposed to replace ageing hardware and update key systems as per Dublin Airport's five-year lifecycle policy. It is intended to ensure continued reliability, performance, and security of Dublin Airport's core IT infrastructure by upgrading the on-premises server and storage environment.
- 6.25 Key deliverables of this project include upgrades to on-premises server infrastructure to support critical airport services and maintain compliance with lifecycle policy, storage arrays and fibre channel switches, operating systems, backup and event monitoring and telephony backend infrastructure.
- 6.26 Dublin Airport states that the storage upgrades are a refresh, optimisation, and incremental expansion within the existing data-centre footprint, aligned with replacement of ageing assets, improved density and efficiency of modern storage platforms, resilience and disaster-recovery requirements. No augmentation of existing physical storage array space is proposed.

CIP27.06.12 – Business Efficiency and Enterprise Applications

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
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€9.9m

5 years

Flexible

N

- 6.27 This project is focused on upgrading and modernising Dublin Airport's enterprise applications, introducing automation, and leveraging emerging technologies such as AI and digital twins. Nine workstreams will be addressed as part of this project, an oracle

fusion migration, service management enhancements, enterprise architecture platform, service management enhancements, IT operations management (ITOM), small business requests (SBR's), HR and time and attendance systems, small application upgrades, digital twins and advanced simulation, DevOps automation. Dublin Airport states that the intention is to transition from Oracle E-Business Suite (EBS) to Oracle Fusion SaaS by the end of the CIP period.

- 6.28 We asked Dublin Airport how this project differed from CIP27.06.04 which also focuses on AI. It stated that while both projects leverage cloud technologies, they deliver distinct outcomes. While CIP27.06.02 uses scalable cloud infrastructure as an enabling platform to support growth and resilience in passenger-facing digital services, CIP27.06.12 is focused on the modernisation and lifecycle replacement of Dublin Airport's core enterprise applications, including ERP and service management platforms.

CIP27.06.13 – Cloud, Data Centre, Disaster Recovery and Infrastructure

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€7.2m	5 years	Flexible	N

- 6.29 This project aims to support Dublin Airport's hybrid cloud strategy by enhancing both cloud and on premises infrastructure, and addresses the need for secure and compliant cloud infrastructure, modernised on site data centres and robust disaster recovery capabilities. The initiative includes the delivery of a secure cloud platform, upgrades to existing data centres, deployment of a cloud-based disaster recovery solution, and implementation of virtual desktop infrastructure.

- 6.30 We asked Dublin Airport how the project interacts with CIP.27.06.02, which lists scalable cloud infrastructure as a key deliverable. Dublin Airport outlines that CIP27.06.13 provides the underlying cloud, data centre and disaster-recovery infrastructure that supports the airport's IT estate. CIP27.06.02 uses this infrastructure as an enabling platform to deliver scalable, passenger-facing digital services. While both reference cloud scalability, CIP27.06.13 delivers the foundational capability, and CIP27.06.02 consumes it to meet passenger demand.

CIP27.06.14 – Data and Integrations

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€11.6m	5 years	Flexible	N

- 6.31 This project is proposed to build upon the migration to Microsoft Azure and the consolidation of Dublin Airport's estate under the CIP2020+. This next phase focuses on expanding the airport's data and analytics capabilities to support predictive modelling, real-time insights, and advanced automation across operational and commercial domains.

- 6.32 Under CIP20.05.003, Dublin Airport implemented a modern data platform improving descriptive and predictive analytics across landside, terminal and airside processes. Outputs include:

- Integration of new & existing systems into combined airfield, departing passenger, arriving passenger, asset management and check-in and baggage data products.

- Live and post ops dashboards and reports used across Dublin Airport
- Extended forecasting improving accuracy and look ahead duration across passenger touchpoints improving the efficiency of terminal processes.

7. Other Projects

CIP27.07.01 – Minor Works

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€6.7m	7 years	Flexible	N

- 7.1 This project is intended to address requirements for minor works that arise during the regulatory period that were not previously identified but are considered necessary to ensure continuous and smooth operations at the airport. The projects typically fall under 1) general maintenance, 2) efficiency and 3) operational safety and security. We have provided for similar allowances since 2014, and Dublin Airport has used the allowance to deliver a range of small projects such as hydration stations and BHS core asset upgrades in the Terminal 1 arrivals carousels.
- 7.2 As noted previously, this project is in the interests of Users as it facilitates minor refurbishment and reactive maintenance. However, we are concerned about the scale of the proposed project given the outturn expenditure to date on CIP20.07.002. We consider that a proposed investment of €33m represents significant cost escalation relative to the €15m allocated under CIP27.07.002, against which Dublin Airport has spent approximately 50%. No proper explanation for this was provided through the RFI process.
- 7.3 While we propose to allow for this project, we do so in line with the IFS' assumption of €1.2m spend per year on average based on a review of the cost estimate provided by Dublin Airport and the historical expenditure on CIP20.07.002 (Minor Projects).

CIP27.07.02 – Construction Accommodation

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€15.7m	10 years	Flexible	N

- 7.4 Dublin Airport is proposing the development of construction accommodation and logistics facilities intended to streamline the delivery of the North Apron and South Apron Hub developments. It proposes to refurbish the former Ryanair HQ, the 'White House', and provide temporary buildings to create a central project office and workspace for staff. A dedicated construction consolidation centre will be established on a greenfield site in Eastlands to support material logistics and personnel movement, and the North Runway compound will be recommissioned primarily as a transport and parking hub for site personnel.
- 7.5 We asked Dublin Airport about the future usage of the temporary buildings following construction. It intends for these construction compounds to be flexible in their use as required by projects delivered throughout the CIP period. This project will deliver the site prep and enabling works and the individual projects will deliver the buildings. The Whitehouse project will be demolished towards the end of the construction of Pier 5 (which will be coordinated with the ASTO relocation).
- 7.6 We note the importance of this accommodation considering the degree of planned works at the airport. We propose a Flexible allowance.

CIP27.07.03 – Capital Planning Studies

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€18.1m	5 years	StageGate	N

- 7.7 This project proposes to support the future development of Dublin Airport through evidence-based analysis and research. The project allowance will be allocated to future planning and regulatory applications and exploring options for long-term infrastructure development. The scope includes an update to Dublin Airport's Masterplan, preparation of planning documentation for potential infrastructure applications in the future, and further planning and feasibilities studies regarding the future of T1.
- 7.8 We note that strategic decisions about the long-term future of the airport may need to be made during this regulatory period, including but not limited to whether Runway 16/34 should be retained or decommissioned, and the possible replacement of Terminal 1. We consider it in the interest of Users and the effective and efficient development of the airport that it undertakes the necessary studies and analysis in support of such decisions. We therefore propose to allow for this project but propose to include it in the StageGate process. This will facilitate ongoing consultation with stakeholders and based on the T1 feasibility study which went through StageGate in the previous period, we find it is beneficial to consult on such key studies. We also note that the cost plan has been developed at a high level and it will be efficient to have further consultation on this as the scope develops.

CIP27.07.04 – Programme Management

Proposed Allowance	Proposed Asset Life	Regulatory Treatment	Triggered Allowance
€30.3m	5 years	Flexible	N

- 7.9 This project provides for the establishment and operation of a dedicated programme management team in respect of CIP27. The objective is to enable coordinated delivery, improved decision-making, and value for money throughout the regulatory period. The portfolio management team will consist of an infrastructure management team for planning sustainability, strategy, programme controls, contracts and commercial, quality, health and safety, technical and governance.
- 7.10 We allowed for a similar, smaller project as part of CIP2020+ (CIP20.07.001). We note that in 2019, the IFS assessed that Dublin Airport had under resourced the programme management team and expected that the cost proposed by Dublin Airport would have been much higher. We note this assessment is reflected in higher than forecast outturn expenditure on this project. Dublin Airport confirms that the scope of CIP20.07.001 changed significantly as the CIP developed because the organisational structure was amended to facilitate the delivery of the CIP. It states that the required additional funding is to facilitate a larger team over a longer CIP period than originally planned.
- 7.11 As in CIP2020+ we consider that this project is in the interests of Users and will supplement efficient and effective monitoring of the delivery of the CIP27 programme.

8. CIP27 Allowances Summary

Table 8.1: Draft Allowances, Asset Lives, Regulatory Treatment

Appendix	CIP	Project Name	Draft Allowance (€m)	Asset Life	Treatment
Sustainability	CIP27.01.01	Terminal 2 and Pier 1 Renewable Heating	106.0	30	SG
Sustainability	CIP27.01.02A	Charging Network	59.6	15	SG
Sustainability	CIP27.01.02B	North Apron GSE Charging Hub	35.5	15	SG
Sustainability	CIP27.01.03	Solar PV and Energy Storage	142.4	25	SG
Sustainability	CIP27.01.04	Mobility and Accessibility	6.9	9	F
Sustainability	CIP27.01.06A	Air Quality and Noise Monitoring	17.3	23	F
Sustainability	CIP27.01.06B	Noise Insulation Scheme	49.1	15	SG
Sustainability	CIP27.01.07	Biodiversity and Natural Habitat Restoration	19.2	50	D
Sustainability	CIP27.01.08	Campus Buildings Sustainability Retrofits	18.7	20	F
Sustainability	CIP27.01.10	Landside Surface Water Compliance	24.8	47	SG
Sustainability	CIP27.01.11	Legacy PFAS Mitigation and Remediation	172.9	20	SG
Airport Development	CIP27.02.02A	Pier 1 East	673.1*	32	SG
Airport Development	CIP27.02.02B	MRO Relocation & facilities	154.5*	25	SG
Airport Development	CIP27.02.04	Terminal 2 CBP and Transfer Extension	150.7*	25	SG
Airport Development	CIP27.02.05A	Pier 5	443.1*	25	SG
Airport Development	CIP27.02.05B	South Apron Expansion	225.7	34	SG
Airport Development	CIP27.02.06	Cargo Relocation (Eastlands)	104.8	50	SG
Airport Development	CIP27.02.07	Gate Post 4 Relocation	19.8*	20	SG
Airport Development	CIP27.02.08	Wide Body Engine Test Facility	21.1	25	SG
Airport Development	CIP27.02.09 & 02.10	North & South Apron De-Icing Storage	15.3	20	F
Airport Development	CIP27.02.11	Fuel Hydrant Network	89.5	30	SG
Airport Development	CIP27.02.12	MV/ HV Network Expansion	389.7	25	SG
Airport Development	CIP27.02.13	Junctions Upgrades	26.4	20	D
Airport Development	CIP27.02.14	Integrated Transport Hub	140.0*	25	SG
Airport Development	CIP27.02.15	Consolidated Security and Screening Centre	62.9*	20	SG
Airport Development	CIP27.02.18	Existing Pier 1 West Extension	32.4	28	F
Airport Development	CIP27.02.20	Existing Pier 2 Optimisation and Refurbishment	77.9*	15	SG
Airport Development	CIP27.02.21	Existing Pier 3 Optimisation and Refurbishment	48.2*	15	SG
Airport Development	CIP27.02.22	Dual Passenger Boarding Bridge to Stand 315C	12.8	15	F
Airport Development	CIP27.02.25	Terminal 2 Pier 3 Arrivals Washrooms	2.6	15	F
Airport Development	CIP27.02.30	Airfield Safety Projects	91.3	15	SG
Airport Development	CIP27.02.31	Airfield Operational Projects	36.0	18	F

Airport Development	CIP27.02.34	Advanced Visual Docking Guidance System	24.7	10	D
Airport Development	CIP27.02.35	Fixed Electrical Ground Power	53.9	15	SG
Airport Development	CIP27.02.36	On Stand CCTV	16.4	7	F
Airport Development	CIP27.02.37	Foul Water Expansion	19.6	35	SG
Airport Development	CIP27.02.38	Hydrant Water Expansion	6.0	35	SG
Airport Development	CIP27.02.39	Potable Water Expansion	7.5	35	SG
Airport Development	CIP27.02.40	Pier 2 Bolt On Extension	14.0	25	SG
Airport Development	CIP27.02.41	Pier 3 Bolt On Extension	4.9	25	SG
Airport Development	CIP27.02.43	PBZ Relocation	39.3	28	SG
Airport Development	CIP27.02.47	Remote Bussing Lounges	6.8	25	F
Airport Development	CIP27.02.48	Terminal 2 Check In and Sortation Optimisation	61.6	15	SG
Airport Development	CIP27.02.49	South Apron Handler Accommodation Relocation	8.5	20	SG
Airport Development	CIP27.02.50	PFAS on Construction sites	106.8**	20	SG
Commercial	CIP27.03.01A	Long Term Express Red Surface Car Park Expansion	26.4	20	SG
Commercial	CIP27.03.01B	Other Car Parks	42.3	20	F
Commercial	CIP27.03.02	Car Rental	83.5	20	SG
Commercial	CIP27.03.03	OCTB Refurbishment	10.7	20	SG
Commercial	CIP27.03.04	Airline Lounges	48.7	12	F
Commercial	CIP27.03.05	Commercial Property Refurbishment	21.2	7	F
Commercial	CIP27.03.06	Platinum Services Collinstown House Upgrade	34.0	10	F
Commercial	CIP27.03.07	Media Sales Expansion	13.9	5	F
Commercial	CIP27.03.09	Commercial Innovation	2.4	5	F
Commercial	CIP27.03.10A	ARI Retail Projects	21.2	7	F
Commercial	CIP27.03.10B	Terminal 2 IDL ARI Refurbishment	25.7	7	SG
Asset Care	CIP27.04.01A	Airfield Pavement Rehabilitation	166.5	25	SG
Asset Care	CIP27.04.01B	Airfield Pavement Rehabilitation- Roads and Jointing	20.5	25	F
Asset Care	CIP27.04.02	Roads and Carparks	85.7	15	F
Asset Care	CIP27.04.03	Airfield Lighting, Control and Signage Upgrades	23.0	22	D
Asset Care	CIP27.04.04	Building Fabric Upgrade	32.7	25	F
Asset Care	CIP27.04.05	Airfield Maintenance Base Improvement Programme	28.6	20	F
Asset Care	CIP27.04.06	Airfield AGL Substation Improvement Programme	14.1	15	F
Asset Care	CIP27.04.07	Campus Buildings Critical Maintenance	3.3	25	F
Asset Care	CIP27.04.08	Piers and Terminals Critical Maintenance	4.1	15	F
Asset Care	CIP27.04.09	Asset Management Stores Consolidation	2.4	20	F
Asset Care	CIP27.04.10	Landside Gardening and Maintenance Consolidation	1.6	20	F
Asset Care	CIP27.04.11	Fire Risk Mitigation	15.0	15	F
Asset Care	CIP27.04.12	Surface Water and Foul	2.3	35	F
Asset Care	CIP27.04.13	Airport Light Fleet Replacements	9.4	5	F

Asset Care	CIP27.04.14	Airport Heavy Fleet and Equipment Replacement	20.0	7	F
Asset Care	CIP27.04.15	Airport Existing MV Network Upgrades	65.7	20	SG
Asset Care	CIP27.04.16	Terminals and Piers Low Voltage (LV) Electrical Upgrade	19.9	20	F
Asset Care	CIP27.04.17	Primary Standby Power Generation Upgrade	28.7	15	SG
Asset Care	CIP27.04.18	Small Energy Projects	12.6	15	F
Asset Care	CIP27.04.19	Campus Buildings M&E and Life Safety Systems	41.0	15	F
Asset Care	CIP27.04.20	Passenger Boarding Bridges and Fixed Electrical Ground Power Upgrades	24.3	15	F
Asset Care	CIP27.04.21	Lifts and Escalators Modernisation Programme	33.7	20	F
Asset Care	CIP27.04.22	Potable and Foul Water Upgrades	15.5	25	F
Asset Care	CIP27.04.23	Terminals and Piers M&E and Life Safety Systems	36.3	13	F
Asset Care	CIP27.04.24	Terminals and Piers HVAC Upgrade	13.2	20	F
Asset Care	CIP27.04.25	Asset Management Monitoring and Control Systems	7.3	10	F
Asset Care	CIP27.04.26	BHS Terminal 2 Critical Asset Re-Life Programme	65.2	20	SG
Asset Care	CIP27.04.27	Baggage Handling System Efficiency and Resilience Upgrades	15.9	14	F
Asset Care	CIP27.04.28	Baggage Handling System Asset Replacements and Upgrades	57.2	15	SG
Asset Care	CIP27.04.29	Terminal Operational Improvements	19.8	10	F
Security	CIP27.05.01	Intrusion Detection System	13.4	10	F
Security	CIP27.05.02	Aviation Security Training Organisation Relocation	27.3*	20	SG
Security	CIP27.05.03	Damage by Vehicle Risk Mitigation	15.0	20	SG
Security	CIP27.05.04	Access Control System Replacement	16.9	7	F
Security	CIP27.05.05	Security Operations Systems and Equipment	43.6	7	F
Security	CIP27.05.06	Hold Baggage System Version Upgrade	3.7	5	SG
Security	CIP27.05.07	Vehicle Control Post 11 and 32 Replacement	9.7	20	F
Security	CIP27.05.08	Terminal 2 Staff Screening Expansion	1.1	15	F
Security	CIP27.05.09	Remote Screening Centre			Disallowed
Security	CIP27.05.10	Security Operations Refurbishments	9.9	10	F
Security	CIP27.05.11	Security Innovations and Technology	7.0	5	F
IT	CIP27.06.01	Airport Passenger Journey	10.5	5	F
IT	CIP27.06.02	Digital Passenger Experience	8.6	5	F
IT	CIP27.06.03	Airfield Technology	10.0	7	F
IT	CIP27.06.04	IT Innovation and AI	7.0	5	F
IT	CIP27.06.05	Sustainability- Digitalisation and Reporting	6.5	5	F
IT	CIP27.06.06	Commercial Technology Upgrades	6.5	7	F
IT	CIP27.06.07	Operational Devices	9.9	5	F
IT	CIP27.06.08	Cyber Security and Cyber Resilience	10.0	5	F
IT	CIP27.06.09	Operational Reliability, Safety, Security and Compliance	22.5	7	F

IT	CIP27.06.10	Networks and Infrastructure	17.6	7	F
IT	CIP27.06.11	Servers and Storage	8.3	5	F
IT	CIP27.06.12	Business Efficiency and Enterprise Applications	9.9	5	F
IT	CIP27.06.13	Cloud, Data Centre, Disaster Recovery and Infrastructure	7.2	5	F
IT	CIP27.06.14	Data and Integrations	11.6	5	F
Other	CIP27.07.01	Minor Works	6.7	7	F
Other	CIP27.07.02	Construction Accommodation	15.7	10	F
Other	CIP27.07.03	Capital Planning Studies	18.1	5	SG
Other	CIP27.07.04	Programme Management	30.3	5	F

Source: Dublin Airport, IFS, IAA

Draft Allowance is nominal

Note that the allowances quoted in this table and under each individual project in this Appendix are the IFS assessed efficient allowance of each project as presented in CIP27. The allowances in this Appendix have not been adjusted for the proposed trigger separation of the ARI Retail, Airline Lounge or Security Operations Systems and Equipment projects. This Appendix therefore reflects our assessment of each project as presented by Dublin Airport in CIP27 which did not, as we have noted throughout, include the retail units, lounges or security equipment in the associated development projects. Affected projects are marked with an * in the table above.

**Not included *ex ante*