

EirGrid Stakeholder Engagement Plan 2022

Consultation Response Paper

23 May 2022



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1. Introduction

This paper (the 'Consultation Response') is the last step in developing our final Stakeholder Engagement Plan 2022. This document responds to customer and stakeholder feedback received to our draft plan. The public consultation for the [draft Stakeholder Engagement Plan 2022](#) ran from January 25th to March 8th, 2022.

EirGrid is the electricity transmission system operator and market operator for Ireland. We believe that working together with all stakeholders – customers and industry, the public and local communities – leads to better outcomes that reflect all views. We will use the feedback received in this process to improve our plans for stakeholder engagement in future.

Our approach to stakeholder engagement is one of continuous improvement. This consultation on our draft Stakeholder Engagement Plan 2022 provided valuable feedback that we used to tailor and improve the plan. We would like to thank all our customers and stakeholders who have taken the time to engage with us.

The feedback we have received has helped to define and inform the final Stakeholder Engagement Plan 2022. All submissions received were considered by the relevant parts of the organisation. We have developed this document to collate the feedback and our responses to it. We also published the final [Stakeholder Engagement Plan 2022 on our website](#) in May 2022.

This Consultation Report

We received a total of four responses from the following organisations:

- Bord Gáis Energy (BGE)
- Federation of Energy Response Aggregators (FERA)
- Irish Solar Energy Association (ISEA)
- Wind Energy Ireland (WEI)

Thank you to those who responded to this consultation. Responses were reviewed and considered and, where possible and relevant, have been incorporated into the final Stakeholder Engagement Plan 2022. In addition, relevant feedback that was not incorporated in our Stakeholder Engagement Plan 2022 has been noted and will be considered for our future plans, where appropriate, as we continue to enhance our engagement.

Finally, some comments submitted related to matters of policy and other areas that are outside the scope of the consultation or EirGrid's remit. As a result, these comments have not been addressed in this response document. Any subject matter feedback that is not within scope for this consultation will be channelled to the relevant areas for consideration.

In the following sections we seek to address the comments and feedback received as follows:

- **Overarching Themes of Responses Received:** Where there was commonality in the points raised, we have sought to address these collectively; and
- **Specific Consultee Comments:** Any responses received which are not specifically covered in the updated Stakeholder Engagement Plan 2022 or under the overarching themes are addressed under this section.

EirGrid looks forward to continued engagement with stakeholders to optimise our stakeholder engagement strategy in future.

2. Overarching Themes of Responses Received

Overall, respondents welcomed the consultation on EirGrid's Stakeholder Engagement Plan 2022. We recognise that there are areas that can still be improved upon and that our stakeholder engagement is a process of continuous improvement. We have identified three key themes common to the consultation feedback which are set out below.

We have updated our [Stakeholder Engagement Plan 2022](#), which was finalised and published on our website on the 9th of May 2022 to include feedback that we received from our stakeholders.

We have also updated our [lists](#) of customer, industry, project engagements and publications planned throughout 2022, both on the EirGrid website and in the appendices of the final plan, with any available updated information.

Please see below for details on the three themes we identified throughout the consultation process and our respective responses.

2.1 Theme 1: Closer co-operation between EirGrid and ESB Networks

Respondents stated that collaboration and engagement between EirGrid and ESB Networks can have positive impacts for other stakeholders, including consumers and grid customers. The desired level of cooperation would speed up connections and improve flexibility.

EirGrid response:

EirGrid agrees with the feedback provided and recognises the importance of collaboration with ESB Networks. EirGrid and ESB Networks have committed to driving the transformation of the power system for future generations.

The collaboration and engagement with ESB Networks as Transmission Asset Owner (TAO) and as Distribution System Operator (DSO) have been set out through the associated joint incentives, as set out for PR5. Details around the assessment and metrics for our joint incentives for the price review period 2021-2025 are set out in the Commission for Regulation of Utilities (CRU) Price Review 5 (PR5) Decision Paper on the Regulatory Framework, Incentives and Reporting (CRU/20/154)¹. The CRU published an information paper on the 2021 Incentive Balanced Scorecards in March 2022 (CRU202226)². The TSO and DSO published a joint multi-year plan covering 2022-2026 for public consultation in October 2021³. The TSO and TAO also published a joint multi-year plan covering the same period for public consultation in October

¹ <https://www.cru.ie/wp-content/uploads/2020/12/CRU20154-PR5-Regulatory-Framework-Incentives-and-Reporting-1.pdf>

² <https://www.cru.ie/wp-content/uploads/2022/03/CRU202226-2021-Balanced-Scorecard-Information-Paper-1.pdf>

³ <http://www.eirgridgroup.com/site-files/library/EirGrid/DSO-TSO-Joint-Incentive-Multi-Year-Plan-Consultation-Paper.pdf>

2021⁴. EirGrid and ESB Networks will continue to publicly consult on both joint multi-year plans on an annual basis as set out in CRU/20/154.

Enhancements to our engagement with ESB Networks as TAO and as DSO is a key component to the success of the joint programmes of work that has been set out between both organisations.

There is a significant programme of grid development work identified as part of the *Shaping Our Electricity Future* programme. This is in addition to the system reinforcement projects already committed to or in progress, which are at various stages of the Framework for Grid Delivery in Ireland. Furthermore, there will be additional network required to support the connection of new generation on to the power system in Ireland. We will work closely with our partners in ESB Networks to deliver on these reinforcement solutions out to 2030.

The programme of work is significant and EirGrid and ESB Networks will look at ways to streamline how we work, incorporating learnings from previous projects with a view to optimising the overall joint delivery approach. For example, early engagement by EirGrid and ESB Networks on scope and approach (including procurement, site investigations, construction approach etc.) will be adopted where appropriate for key projects due to complexity and risk to delivery timeline. This has already commenced on some current projects.

2.2 Theme 2: Request that industry feedback is shown to be taken on board

Respondents wanted evidence that industry feedback has been considered and that KPIs could be introduced into the stakeholder engagement plan. There was also a request for further information on how customer survey feedback is incorporated into work practices. It was also suggested that the stakeholder plan should be published before the start of the year.

EirGrid response:

EirGrid acknowledges the importance of closing feedback loops for our stakeholders. EirGrid endeavours to take industry feedback on board and to feed it into the decision-making process where possible. We have now enhanced the functionality on our consultation portal to include an 'outcome' feature, which will show stakeholders how consultation feedback has informed the final document and/or decision.

In some engagements EirGrid has provided substantial detail as evidence that industry views have been considered.

For example, in 2021 EirGrid published an industry specific response to the *Shaping Our Electricity Future* consultation. This sought to ensure that an appropriate level of technical detail was provided to industry that far exceeded the public consultation response. It was then possible to see how these industry responses contributed to the final [Shaping Our Electricity Future roadmap](#).

⁴ <https://www.eirgridgroup.com/site-files/library/EirGrid/TAO-TSO-Joint-Incentive-Multi-Year-2022-26-Consultation-Paper.pdf>

EirGrid acknowledges the importance of our Customer Survey as a way of taking direct feedback from this important stakeholder group. In February 2022, EirGrid issued a customer survey to 77 customers from 67 organisations to ask for feedback on their experience of engaging with EirGrid during 2021. The results of the survey will be used to inform and enhance our stakeholder engagement and drive customer service across various teams within EirGrid during 2022 and beyond. The survey has provided us with valuable information, the two main themes for improvement include, resourcing and accessibility of staff, these are two areas we hope to improve this coming year. The results of the survey are outlined in detail in our recently published Stakeholder Engagement Report 2021⁵.

EirGrid acknowledges the desire of some stakeholders to see the earlier publication of the Stakeholder Plan and we will endeavour to do so going forward. We will also review the possibility of introducing KPIs into next year's plan.

2.3 Theme 3: Request for more information on EirGrid's activities on transitioning the grid to 2030

We received requests in our consultation feedback responses regarding the Government's 2030 renewable targets. It was suggested that improvements are needed in communicating to stakeholders insights on EirGrid's activities around the transition to 2030.

EirGrid response:

Between now and 2030 there needs to be a transformational step change in the volume of network reinforcements delivered across Ireland to meet Government renewable energy targets in an efficient and effective manner. The Government's 2021 Climate Action Plan (CAP) raises the target for renewable-sourced electricity from 70% to 80%, which will involve increased solar, onshore wind, and offshore wind power.

One of the objectives of *Shaping Our Electricity Future* is to describe how the transmission network in Ireland could evolve out to 2030. This follows detailed consultation where we used scenario-based analysis to identify a transmission network roadmap. The future evolution of the power system beyond 2030 is also implicitly considered in delivering on ambitions to be carbon neutral before 2050.

Finally, EirGrid has established a *Shaping Our Electricity Future* Advisory Council which will provide updates on key developments in our progress to meet the Government's 2021 CAP 80% target, as well as acting as a forum for industry feedback. The final Stakeholder Engagement Plan 2022 has been updated to include the *Shaping our Electricity Future* Advisory Council provisional meeting dates for 2022 and 2023.

3. Specific Consultee Comments

As outlined above, EirGrid received a total of three consultation responses on its Stakeholder Engagement Plan 2022.

⁵ https://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Stakeholder-Engagement-Report-2021_.pdf

This section provides detail on the aspects of the consultation responses not previously addressed in the overarching themes and includes replies to the feedback received.

3.1 Bord Gáis Energy (BGE)

BGE commented as both a customer of EirGrid and a key stakeholder in a number of areas. It supports proactive and strategic stakeholder engagement by EirGrid to meet customer needs across the delivery of EirGrid's 2020-25 strategy, now in its third year. BGE also welcome EirGrid's aims and commend their plans to grow and improve their stakeholder engagement through their Stakeholder Engagement Plan 2022. The below section sets out our response to the main points raised by BGE - where not previously addressed in the overarching themes (above) or in our final Stakeholder Engagement Plan 2022.

Request for better information on website, including a list of project consultations and their status:

"BGE welcome the upgrading project on the EirGrid website to improve the accessibility of information to stakeholders. We ask that our previous feedback and suggestions for improvement to the EirGrid website (grouping of consultation documentation into a "consultation library", and the option to register for consultation notifications) is taken into account in website design and build considerations. For example, what would be very useful is a library of consultations contained in a single place on EirGrid's website that will clearly identify the status of all consultations (open, closed) regardless of the topic they relate to and the outcome from EirGrid demonstrating the closing of the feedback loop to stakeholder input."

EirGrid response:

In March 2021, we launched a new, permanent consultation portal which is now used to host consultations on grid development projects.

Our new site (consult.eirgrid.ie) provide seamless integration with our digital suite and provides exceptional user experience for stakeholders.

Stakeholders can provide their feedback on specific routes and sections of proposals and can use the portal to stay up to date on project developments. The portal does not currently have a "notifications to users" function, but it is something EirGrid will consider in the future development and updates to the portal.

EirGrid uses the portal to demonstrate to stakeholders how their feedback is used, and we also publish stakeholder submissions there, so stakeholders can see what other feedback is being considered.

Users can participate in public consultations or search for open and upcoming consultations.

Registration is a one-time process and, once complete, can be used for all EirGrid's online public consultations. Users can make submissions across multiple consultations and save the progress of partially completed submissions to complete at a later date. Feedback on the portal from stakeholders has been excellent to date.

EirGrid is currently developing the portal further, including putting in place mechanisms and processes to ensure consistency and resourcing of the portal longer term. The suggestions put forward by BGE will be considered in future updates to the portal and the EirGrid website.

The portal will also be considered in the broader redevelopment of the EirGrid website, as will a consultation library.

3.2 Irish Solar Energy Association (ISEA)

The Irish Solar Energy Association (ISEA) appreciate the opportunity to provide feedback on EirGrid Stakeholder Engagement Strategy and Plan 2022 and welcomes EirGrid's acknowledgement of the large number of stakeholders they have. It is a positive feature that the stakeholder segmentation analysis takes into consideration many stakeholders within the 'Customers and Industry stakeholders'.

ISEA also notes their appreciation for EirGrid's acknowledgement of engaging with stakeholders in meeting the challenges of transitioning to a low carbon society. The public & industry consultations and stakeholder engagement are welcomed steps towards achieving this goal. The below section sets out our response to the main points raised by ISEA - where not previously addressed in the overarching themes or in our final Stakeholder Engagement Plan 2022.

Request that connection standards are reviewed as they are too conservative:

"ISEA does feel that current connection standards are ultimately too conservative which in turn impedes the progress of decarbonisation by increasing the cost of connecting to the grid...."

EirGrid response:

EirGrid keeps its connection standards under review, as evidenced by recent standards reviewed and updated.

The [Policy Statement on Options for Connecting Customers to the Transmission Network](#) was updated in November 2021.

The [Policy Statement on Busbar Configuration for 110 kV, 220 kV and 400 kV Transmission Substations](#) was updated in October 2020.

The review process takes into account industry feedback as outlined in the document '[Engagement process for development and update of technical standards and policies](#)'.

EirGrid is committed to engaging with industry in relation to technical standards through this process on an ongoing basis. We have established a *Shaping Our Electricity Future* Advisory Council which will provide updates on key developments as well as acting as a forum for industry feedback.

Query regarding EirGrid's thought leadership position:

"We appreciate the intent of EirGrid in aiming to provide 'thought leadership' on energy policy but we question if this role is within their purview. Strictly speaking, it is the responsibility of the

Department of Environment, Climate & Communications (DECC) to set policy in this area (though we recognise that is appropriate for EirGrid to express a view).”

EirGrid response:

The over-arching purpose of EirGrid’s thought leadership programme is to enable the delivery of our corporate strategy and to achieve the Government’s renewable ambitions to 2030 and beyond.

We do this through seeking to appropriately engage to support the development of policy and regulation. This includes responding to Government requests for information and provision of our expertise across the group and responding to public consultations in both the regulatory and policy environment. It also includes attendance at industry fora and presenting material, analysis and insight to inform thinking with the industry and broader ecosystem.

Request for EirGrid to rollout an education and engagement campaign:

“ISEA believes that an ‘Education and Engagement Campaign’ by EirGrid to inform the public as to their role is particularly important for ensuring societal acceptance of the green transition and the building of grid infrastructure.”

EirGrid Response:

In recent years, EirGrid has invested heavily in national communications campaigns aimed at raising awareness of EirGrid and the broader issue of climate change and the move to renewable generation.

In October 2020, EirGrid launched the “Stepping Up” advertising campaign. It ran for six weeks across multiple platforms, including television. The campaign was supported by a dedicated website with accessible, engaging information.

The campaign had a very positive impact with 25% of those polled hearing of EirGrid because of the advertisement. There was an increased understanding of who EirGrid is and what we do, and an increased understanding of EirGrid’s role in sustainability.

In May 2021, EirGrid re-configured the “Stepping Up” television advertisement as a call to action for the *Shaping Our Electricity Future* consultation to support other messaging and collateral being deployed.

The advertisement was timed to coincide with recruitment for our Deliberative Dialogue initiative and to raise public awareness of EirGrid and the consultation process.

The advertisement ran from May 3rd – 30th and performed exceptionally well, with ratings, coverage and quality targets met. It appeared alongside top-rated programmes, including news, entertainment, current affairs, soaps and sport. An Irish language version of the advertisement also ran on TG4 during the same timeframe.

EirGrid continues to utilise all channels available to it to raise awareness and educate the public and stakeholders. We use social, digital and regional media in particular to highlight project milestones, partnerships and sponsorships, technical achievements, and to raise awareness of the role of renewables in the provision of renewable energy.

[Eirgrid.ie](https://eirgrid.ie) provides public facing information on who EirGrid are, what we do and the answers to key frequently asked questions.

As part of the *Shaping Our Electricity Future* roadmap, the public engagement workstream commits to further developing these strands of information and to develop a hub on the EirGrid website that will be a resource to stakeholders and the public. The website is currently being reviewed and revised.

Publish KPIs for strategy 2020-25 supporting goals in the stakeholder engagement plan:

“ISEA agrees with EirGrid’s prioritisation of climate change and decarbonisation within their strategy: “our 2020-25 strategy is shaped by two factors; climate change and the transition of the electricity sector to low-carbon, renewable energy. This strategy was informed by extensive engagement with key stakeholders. These included industry fora, government departments, customers, as well as board members, management and staff from across EirGrid Group.”

“We welcome EirGrid’s recognition of the need to engage continuously with industry and we agree with the primary goal to “lead the island’s electricity sector on sustainability and decarbonisation.” However, we do question if this goal aligns with EirGrid’s role under legislation to “operate, develop and enhance the all-island power system and the wholesale electricity market.” However, we are supportive of the supporting goals to “operative, develop and enhance the all-island grid”, “work with partners for positive change” and “engage for better outcomes for all” subject to the caveat that key performance indicators for these supporting goals are not mentioned in the Stakeholder Engagement Plan. In the interest of accountability, we believe this should be made available to EirGrid stakeholders.”

EirGrid response:

EirGrid will take this feedback into consideration regarding key performance indicators in our future plans to enhance and improve our stakeholder engagement reporting.

Request to include supply chain transparency in environmental reporting:

“We would also encourage EirGrid to consider the inclusion of supply chain transparency for this reason as part of their Environmental Reporting – the overseas production & importation of equipment is ultimately part of EirGrid’s environmental footprint even if this is not considered as part of Ireland’s official emissions statistics.

It may also be worthwhile to consider Supply Chain Transparency as part of procurement – EirGrid should be able to demonstrate that procured equipment is manufactured by workers who operate in ethical & safe conditions. This is important not only for environmental & social responsibility obligations but also for managing public relations with key stakeholders.”

EirGrid response:

Over the last twelve months we have developed Science Based Targets for the organisation, i.e. greenhouse gas emission reduction targets based on the latest climate science, taking into account Scope 1, 2 and 3 emissions. The scope 3 emissions include our supply chain related emissions. We have published our targets in April and commit to reporting on progress against these annually.

In parallel we have also been developing a new sustainability strategy which we will publish shortly. As part of the development of this we sought the views of internal and external stakeholders on what areas they thought the Group should focus on from a sustainability

perspective through a materiality assessment. An element of this strategy will also focus on how we can further embed sustainability into our procurement practices.

Note that we already publish our Modern Slavery Statement⁶ which outlines our steps taken to combat modern slavery in our business and supply chains and our related policies in this area.

3.3 Wind Energy Ireland

As a member of the CRU NSEE Panel, WEI has welcomed and appreciates the efforts made by EirGrid in producing these annual documents setting out our engagement activities for the year and we look forward to continuing working with us in 2022. WEI have singled out continued support in particular areas such as Shaping our Electricity Future, Customer Survey and the ongoing improvement of our accessibility of information to stakeholders and industry. The below section sets out our response to the main points raised by WEI- where not previously addressed in the overarching themes or in our final Stakeholder Engagement Plan 2022

When will the industry forums be established as per the commitment to do so in SOEF?

“Shaping our Electricity Future – We support the initiatives outlined but it is our understanding that a SOEF industry forum or advisory council structure is to be established that covers the pillars under the roadmap – grid, markets and operations. This does not appear to be addressed in the plan and we request further clarity on this structure such as its function, when it will be set up and how industry will be represented on it.”

EirGrid Response:

The *Shaping our Electricity Future* Advisory Council will discuss the pillars and will ultimately help facilitate the progress of the *Shaping our Electricity Future* programme regarding the milestones and deadlines the programme has set out. The Council will also provide a forum to discuss stakeholder reviews and concerns on those issues which impact the implementation of the programme. The first *Shaping Our Electricity Future* Advisory Council meeting took place on May 4th, 2022. The purpose of the council is to:

- Discuss, review and ultimately help facilitate the progress of the *Shaping Our Energy Future* programme
- Share relevant information related to the implementation of the programme
- Communicate with stakeholders
- Provide a forum to discuss stakeholder views and concerns on issues that impact the programme implementation
- Provide input, advice and assistance on matters related to the programme and its implementation

EirGrid is now seeking expressions of interest from those who would like to become members of the Advisory Council. The deadline for applications is 9 June, further information is available on our [website](#). The final list of members will be made public on the EirGrid website, along with information on how to become a member and publication of meeting materials.

⁶ <https://www.eirgridgroup.com/site-files/library/EirGrid/Modern-Slavery-Statement-2022.pdf>

The council will meet every four months and will be chaired by the EirGrid Group Chief Innovation and Planning Officer.

Advisory Council provisional meeting dates	
1	04 May 2022
2	15 September 2022
3	18 January 2023
4	10 May 2023
5	13 September 2023
<i>Dates may be subject to change</i>	

Minutes and actions will be recorded and kept under review and a summary of each meeting will be published. Ad-hoc meetings outside the regular schedule will be held on an exceptional basis as required.

The final Stakeholder Engagement Plan 2022 has been updated to include the Shaping our Electricity Future Advisory Council purpose, membership process and provisional meeting dates for 2022 and 2023.

Request for a database of projects to be established and regularly updated on eirgridgroup.com

“We welcome the fact that there is a project underway to look at ways of improving the accessibility of information on the EirGrid website and how information is communicated to stakeholders. We have shared our feedback on grid publications with EirGrid and we would like to reiterate that a central database of grid development projects that is maintained and updated regularly would be extremely useful information for stakeholders. We would suggest this is included in plans for updating of the website.”

EirGrid response:

Work is underway on the redevelopment of the eirgridgroup.com website and accessibility of information is one of the key areas being looked at. The website redevelopment will also address improvements made to the ‘Grid’ development and projects section of our website. The feedback WEI has provided will be taken into consideration in the redevelopment of the EirGrid website. In the interim, we are seeking to make the website more user-friendly while still providing the most up to date information possible. A projects library section is currently available on the EirGrid website [here](#).

3.4 Federation of Energy Response Aggregators (FERA)

Request that FERA is added to list of stakeholders

EirGrid response:

FERA has been added to list of stakeholders in our final Stakeholder Engagement Plan 2022.

4. Conclusion

EirGrid thanks all those who responded to this consultation, which was specifically to receive feedback on our stakeholder engagement plans for 2022 as set out in the draft Stakeholder Engagement Plan 2022.

All responses were reviewed and considered and where possible, we have incorporated feedback into the final Stakeholder Engagement Plan 2022. In addition, relevant feedback that was not incorporated in our Stakeholder Engagement Plan 2022 has been noted and will be considered for our future plans, as we continue to enhance our engagement.