

EirGrid Stakeholder Engagement Plan 2021

Consultation Response Paper

25th March 2021



Document Control

Version History		
Version	Publication Date	Record of Amendments
1.0	25 th March 2021	Baseline Version

Contents

1.	Introduction	3
2.	Overarching Themes of Responses Received	5
2.1	Theme 1: Further channels of and future direction of Stakeholder Engagement	5
2.2	Theme 2: Shaping our Electricity Future, supporting initiatives and infrastructure development	6
2.3	Theme 3: Online Resources and Notifications	8
2.4	Theme 4: Value delivery to customers and stakeholders & measuring success.....	8
3.	Specific Consultee Comments.....	10
3.1.	Bord Gáis Energy (BGE)	10
3.2	Demand Response Aggregators of Ireland (DRAI)	12
3.3	Energy Storage Ireland (ESI)	13
3.4	Irish Energy Storage Association (IESA).....	13
3.5	Wind Energy Ireland (WEI) (formerly Irish Wind Energy Association (IWEA)	14
3.6	UCD Energy Institute (UCDEI).....	16

1. Introduction

This paper (the 'Consultation Response') is the last step in developing our final Stakeholder Engagement Plan 2021. This document responds to customer and stakeholder feedback received to our draft plan. The public consultation for the draft Stakeholder Engagement Plan 2021 ran from 18th November 2020 to 13th January 2021.

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 2021 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 2021. All submissions received were considered by the EirGrid Customer team. They were also shared with relevant parts of the wider organisation, where relevant, to inform our stakeholder engagement plans. Following this process, we have developed this document to collate the feedback and our responses to it. We also published the final [Stakeholder Engagement Plan 2021](#) on our website in February 2021.

This Consultation Report

We received a total of 6 responses from the following organisations:

- Bord Gáis Energy (BGE)
- Demand Response Aggregators of Ireland (DRAI)
- Energy Storage Ireland (ESI)
- Irish Energy Storage Association (IESA)
- Wind Energy Ireland (WEI)
- UCD Energy Institute (UCDEI)

Thank you to all those who responded to this consultation which was specifically to receive feedback on our stakeholder engagement plans for 2021 as set out in the draft Stakeholder Engagement Plan 2021. All responses were reviewed and considered and where possible, we have incorporated feedback into the final Stakeholder Engagement Plan 2021. In addition, relevant feedback that was not incorporated in our 2021 Stakeholder Engagement Plan has been noted and will be considered for our future plans, as we continue to enhance our engagement.

Finally, some comments submitted related to matters of policy and other areas, are outside the scope of the consultation. As a result, these comments have not been addressed in this

consultation response document. Any subject matter feedback that is not within scope for this consultation will be channelled to the relevant areas for consideration.

Several common themes were raised in the submissions we received. We address below how these themes have been incorporated into our final Stakeholder Engagement Plan 2021.

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 on high level topics/themes, 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 2021 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 this consultation on EirGrid's Stakeholder Engagement Plan 2021. The improvements to our stakeholder engagement such as the earlier engagement for consultation were acknowledged by respondents. While welcoming this feedback, we recognise that there are areas which could still be improved upon and that our stakeholder engagement is a process of continuous improvement. We have identified four key themes common throughout the consultation feedback which are set out below.

We have updated our [Stakeholder Engagement Plan 2021](#), which was finalised and published on our website on 26th February 2021, to include feedback that we received from our stakeholders, such as details around the tools and communication channels we will be focussing on throughout 2021 and also regarding the on-going work on Shaping Our Electricity Future.

We have also updated our [lists](#) of customer, industry, project engagements and publications planned throughout 2021, both on the EirGrid website and within the Appendix of the final plan, with any available updated information.

Please see below for detail on the four key themes we identified throughout the consultation process and our respective responses.

2.1 Theme 1: Further channels of and future direction of Stakeholder Engagement

Overall, respondents have welcomed the improvements that EirGrid has made in stakeholder engagement specifically regarding the earlier engagement approach adopted for our Stakeholder Engagement Plan 2021. One respondent observed that in response to the COVID-19 pandemic, all organisations have had to embrace new technologies and channels of engagement, which has been recognised within the consultation document. In some instances, these tools enable wider engagement, however it is important to ensure all stakeholders continue to be able to engage. Another theme emerging in the consultation responses was the importance of online engagement tools to broaden engagement opportunities. Two industry body representative respondents highlighted that they would like more regular or enhanced engagements with EirGrid with a view to collaborating on specific topics.

EirGrid response:

Through our ongoing work on stakeholder engagement and through our governance, one of the areas of focus are our tools and channels of communication to broaden the options available to our stakeholders and us. EirGrid is piloting a number of virtual tools with the intention of adding these to our engagement toolkit across projects, and where appropriate these will also be considered for other engagements across the business. These include interactive webinars, a new consultation portal for projects and enhanced web publications where possible. We are conscious that not all stakeholders may want to use these tools and may prefer to continue to use other available channels. We continue to seek feedback on the preferred channels of engagement from all our stakeholders to enable all stakeholders to engage with us through their preferred methods wherever possible.

As set out in our finalised Stakeholder Engagement Plan 2021, in Q1 2021 we published [Our Public Engagement Strategy for a Cleaner Energy Future](#). This strategy outlines our new approach to public engagement in detail. In December 2020, we published our [Engage with Us – A Guide for Customers and Industry Stakeholders](#) document, as we committed to providing in our final Stakeholder Engagement Plan 2020. This document summarises EirGrid’s engagement channels and points of contact for our customers and industry stakeholders. We intend this guide to provide support to customers and to provide clarity on how our customers and industry stakeholders can have their say and how these insights and feedback are used within EirGrid. We are continuing to engage through regular meetings as part of various initiatives and programmes of work that are already in place, including further engagement on FlexTech.

We welcome engagement with industry representative bodies and recognise the benefits of effective engagement for both these bodies and EirGrid. We are currently considering how we can best continue to engage with the growing number of bodies to allow for meaningful engagement and building of understanding, while also recognising the need for subject matter experts to continue to effectively manage and deliver the services and changes required to meet system and customer needs.

2.2 Theme 2: Shaping our Electricity Future, supporting initiatives and infrastructure development

While welcoming feedback on the Shaping our Electricity Future (SOEF; with former working name of Pathways to 70% Renewables by 2030) study and the consultation and engagement processes taking place in 2021, some respondents outlined that they would appreciate if the final outcome could be made available earlier than Q3 2021. They noted that there are no regrets options in areas like grid development and DS3 that can be progressed at this stage without waiting until the publication of the final plan. Another respondent commented that as engagement will be taking place online, their view is that this should be supplemented by a higher level than normal number of bilateral meetings with industry and representative bodies.

One respondent commented that the TSO should strive to improve the provision of information around constraints for certain projects in a clear and easy to understand manner – specifically information on the future grid plans and the extent to which these grid plans will alleviate constraints with new interconnection and increasing renewables in the West and South. Another respondent noted that the increased levels of electricity generation from renewable energy sources will create additional challenges for constraints and will also necessitate the connection of new technologies to the distribution system.

Two respondents provided feedback on the level of engagement on FlexTech to date. The respondents would like to see greater engagement and transparency and a robust roadmap to support delivery of its stated aim.

EirGrid response:

SOEF is a study including analysis, data and findings of reviews performed on three key areas namely, electricity markets, networks and system operations. The main objective of the SOEF initiative is to outline an orderly transition to the renewable ambition over the next 10 years.

The SOEF consultation report sets out a range of credible approaches and options to meet the renewable ambition. EirGrid are asking for industry feedback on what the optimal roadmap to achieve the renewable ambition should include. We are seeking the optimal network investments, electricity market reforms and changes to system operations that achieve the renewable ambition while maintaining the reliability of the electricity supply and minimising the overall cost to the electricity consumer.

We appreciate the feedback we received from our customers on this initiative and understand your concerns and the importance and magnitude of this work. Engagement, including bilateral engagement, on SOEF will take place during Q1 & Q2 2021. We have considered the request to publish the final roadmap earlier in the year and can confirm that the earliest publication date for the final Plan will be September 2021. This is to ensure that all stakeholders across the spectrum have had an opportunity to meaningfully engage in the process.

Regarding the comments received in relation to the no regrets options in areas like Grid Development and DS3, EirGrid will be conducting another round of studies including a study of the common reinforcements/no regret options in more detail in support of the final SOEF roadmap. EirGrid are actively bringing forward some of the no regret projects and plan to progress them through our internal governance bodies.

In relation to increasing levels of electricity generation associated with enhanced interconnection and renewable energy sources creating additional challenges for constraints in regions such as the South West, we fully recognise the importance of this issue. Constraints are considered when identifying credible needs for a transmission network investment as part of our Framework for Grid Development. Viable solution options are then developed in order to meet the identified need. Existing projects that have been established in order to address these needs are set out in the Transmission Development Plan. In addition, a large amount of data is made publicly available to support customers to undertake their own assessment on future constraints.

Future interconnection and generation have been considered in our work on SOEF and the four options that have been proposed with regard to setting out the roadmap for development of grid infrastructure. The consultation considers constraints associated with the various options and we welcome all feedback. We have requested stakeholder feedback on the analysis, data and findings of reviews performed on electricity markets, networks and system operations. We will use this valuable feedback to help validate our scenario-based models and to update assumptions, drivers and risks.

EirGrid also welcomes the feedback received on the FlexTech initiative and we acknowledge that our engagement with stakeholders has not been as comprehensive as originally planned over the last year. This was due to competing priorities and the need to focus resources on other key areas of our business during these unprecedented and challenging times. Notwithstanding this, many of the year one priority areas identified did progress over 2020.

The FlexTech initiative is a key enabler of the energy transition to 2030 and our collective ability to achieve the 70% renewable electricity ambitions. In that regard, we recognise that we will

need to ensure that the programme receives the necessary focus and prioritisation, and that engagement with stakeholders is transparent and meaningful.

2.3 Theme 3: Online Resources and Notifications

A number of respondents commented on the accessibility of information on EirGrid's website, such as consultations, documents in the library and the Stakeholder Engagement site. There was a request to prioritise this given that improvement has been requested for a year or so through feedback and the Networks Stakeholder Engagement Evaluation (NSEE) Panel recommendations. A suggestion for a live register on the EirGrid website for public engagements was received. One respondent also suggested it would be helpful to receive email notifications when documents are published on the website. Another comment received was regarding the fact that although there is a significant amount of data available, the website is difficult to search and navigate and the required data is often difficult to access.

EirGrid response:

We acknowledge the need to improve accessibility given the now significant amount of data and documentation available on our website. We are currently investigating how best to implement the European Open Data Directive with a view to making our data available in an easily accessible format. This would cover reports, *.csv files, and other data formats. In Q1 2021, we launched our new consultation portal for projects for more meaningful stakeholder engagement. Please see link to the consultation portal [here](#).

We will be starting a process of analysis and review to further upgrade our website later in 2021. During this review, we will incorporate stakeholder feedback previously received on this topic. EirGrid is considering the best method of providing updates on transmission projects on our website. EirGrid will also look to adopt new online tools to facilitate evolving methods of engagement where appropriate.

As part of our planned upgrades to the website, the search functionality is a key priority. In the interim, we are looking into ways which we can make the website more user-friendly while still providing the most up to date information possible. The feedback that we have received via our consultation processes and customer survey will help to inform how the website will be improved. We feel that it is important to note that there may be stages to this redevelopment, with changes requested across a range of stakeholders implemented as a priority, while other changes requested among fewer stakeholders implemented at a later stage. However, we will endeavour to take on board all feedback for feasibility assessments in relation to the corporate websites.

We continue to maintain our [Stakeholder Engagement webpage](#). This includes a comprehensive plan of our specific engagements for 2021, including the type and topic of engagement, key stakeholders, timing and the objective of the engagement.

2.4 Theme 4: Value delivery to customers and stakeholders & measuring success

One respondent provided feedback that specific objectives metrics for how EirGrid intends to engage with stakeholders and how to measure success would be beneficial. For instance, this

could entail how comments, feedback and input from stakeholder engagement is recorded, considered and integrated into business activities or processes. Another respondent requested that EirGrid enhance how they demonstrate the value they expect to deliver to customers and stakeholders through their planned engagement activities. The respondent requested that the expected activity outputs should be quantified insofar as possible in terms of the value it will deliver for customers and consumers. One respondent specifically suggested that it would be of value to stakeholders for EirGrid to share relevant analysis reports with industry simultaneously when the reports are submitted to the Regulatory Authorities.

EirGrid response:

EirGrid would like to thank our customers and stakeholders for this valuable feedback. Engagement for better outcomes for all is one of our strategic goals. Ensuring this engagement is effective and delivers value for customers is of high importance.

We actively assess and review how we measure success with a view to continually improving in this regard and it is a topic of focus for our stakeholder engagement governance. We are working to implement objective assessments of engagement effectiveness that are useful and meaningful to both EirGrid and stakeholders alike.

EirGrid has a tracker survey that measures public awareness of the role EirGrid plays in addressing the climate crisis as well as an understanding of who we are and what we do. This also monitors key questions such as attitudes to new infrastructure. This allows us to engage more meaningfully with the public when communicating the need for our grid infrastructure projects.

In January 2021, a survey was issued to all of our customers to ask for their feedback on their experience of engaging with EirGrid during 2020. This and future surveys will continue to be used to measure the effectiveness and success of our engagement. In our engagements with customers, we ensure to track all actions and endeavour to close out each action from our meetings in a timely manner. Internally we are rolling out a Customer Relationship Management tool across the organisation to enhance tracking and reporting functionality.

The effectiveness of our engagement is also fundamentally measured through the delivery of our Price Review 5 (PR5) incentives, including the annual evaluation by the NSEE Panel. Delivery of the PR5 programme will see enhanced process improvements deployed by both EirGrid and ESNB to embed and ensure value delivery to stakeholders and effective measuring of success. In 2021 we will commence work on initiatives under PR5, to deliver an Enhanced Customer Journey from start to finish, focusing on effective customer and industry engagement. We will focus on early engagement and ensuring that customers and industry stakeholders can easily find relevant and up to date information on connecting to, and the planning, development and operation of, the grid.

We welcome this annual evaluation and the valuable feedback it provides and work to implement enhancements and changes recommended. These incentives have been carefully designed to ensure value is delivered.

In relation to the publication of analysis reports when submitting to the Regulatory Authorities, EirGrid does not consider the sharing of analysis reports with industry, in advance of the Regulatory Authorities making their decision, to be appropriate.

3. Specific Consultee Comments

As outlined above, EirGrid received a total of six consultation responses on its Stakeholder Engagement Plan 2021.

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

3.1. Bord Gáis Energy (BGE)

BGE commented that as both a customer of EirGrid and a key stakeholder in a number of areas, BGE supports proactive and strategic stakeholder engagement by EirGrid to meet customer needs across the delivery of EirGrid's 2020-25 strategy. BGE also welcome EirGrid's aims and commend their plans to grow and improve their stakeholder engagement through their Stakeholder Engagement Plan 2021.

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 2021.

3.1.1 Alternative forward arrangements - interim solution:

BGE requested that EirGrid prioritise its activities on alternative forward arrangements on the interconnectors. BGE also notes that the "Interconnection Operations BREXIT Consultation" in Q3 2021 on EirGrid's planned consultations list, but see that as being too late to affect a meaningful change for participants in 2021 given its focus, as BGE understand it, on the enduring solution due to take effect in Q2 2022.

EirGrid response:

EirGrid plc and EirGrid Interconnector Designated Activity Company (EIDAC) are engaging fully in the process as set out in the Brexit Trade and Cooperation Agreement (TCA) and are consulting with all relevant stakeholders on any implications for the Single Electricity Market (SEM). It is not possible at this point to inform as to the details of any proposed market design as the Cost-Benefit Analysis of any proposed approach is ongoing and therefore a definitive position has not been reached.

In parallel to this, EIDAC is considering the suitability of future interim options and mechanisms that may facilitate the allocation of electricity interconnector capacity at the Forwards and Day Ahead timeframe, which are mutually beneficial to market participants and the TUoS customers as the underwriter of the EWIC asset. A date of Q3 2021 is planned to conduct a public consultation. However, EIDAC welcomes feedback and the opportunity to engage informally with market participants in advance of this.

3.1.2 Alignment of processes with ESB Networks:

BGE expects that all efforts are made to enhance the alignment of processes with ESB Networks (ESBN) to ensure efficient project delivery for the grid to deliver the expectations for 2030 and enable strong stakeholder engagement by both parties.

EirGrid response:

As referenced in our [2020 Stakeholder Engagement Report](#), EirGrid and ESBN, as Transmission Asset Owner (TAO), engaged over the course of 2020 with CRU to agree the PR5 Capital Allowance for the next 5 years. The PR5 programme, proposed by both organisations, is a very ambitious programme of work and includes over 300 projects and represents a 24% increase in Capex allowance from Price Review 4 (PR4). The projects include system reinforcements and customer connections. This approach is necessary for us to do our part to support the government climate change plan and support economic development across the country while reinforcing and maintaining security of supply and is closely aligned with the strategies of both companies. The enhancement of our engagement with ESBN as TAO is a key component to the success of this joint programme.

In addition, and as set out in our [Stakeholder Engagement Plan 2021](#), throughout 2021 we will be collaborating closely with the TAO to jointly develop and implement optimal grid delivery process improvements (many of which we have already trialled on existing projects) and further enhancing collaboration and cooperation between us to the benefit of all our customers and Ireland's consumers.

Success of our partnership will be measured as our performance and associated joint incentives in PR5 around the delivery of our programme for grid delivery including new connections and asset management. This programme will see even closer cooperation between EirGrid, as TSO, and ESBN, as TAO, leading to increased project delivery output and joint process improvements throughout 2021. Details regarding the assessment and metrics for our joint incentives for 2021 to 2025 are detailed in the CRU's PR5 decision.

In addition to the above, Goal 3 of the recently published [Our Public Engagement Strategy for a Cleaner Energy Future](#) set out our approach to engagement with stakeholders, specifically around creating stronger links with state and semi-state bodies.

3.1.3 Processes expected under PR5:

BGE expressed a preference to better understand how the application of the processes expected under PR5 will be shared with stakeholders. BGE feels that there are benefits to stakeholders in sharing this information.

EirGrid response:

We are currently engaging with CRU on the PR5 Reporting and Incentives decision and the new requirements. EirGrid expects that the information will be provided to stakeholders for information purposes in accordance with the approach agreed with CRU.

3.1.4 Consultation Timings:

BGE referenced standardisation of consultation timings requesting a minimum 4-6 weeks with extra time allowed over holiday periods to ensure stakeholders have the necessary time to consider the topic and provide their response to EirGrid. BGE drew attention to the TSOs' paper on the Proposed 2020/2021 Generator Transmission Use of

System (GTUoS) Tariffs dated 28 July 2020 with a response date of 11 August 2020 which should be considered as insufficient time for stakeholders to draft their responses during the summer vacation period.

EirGrid response:

Most of our consultation periods run over a 4 to 6-week time frame and we endeavour to provide additional time for review where timelines allow. Regarding the GTUoS example above, the GTUoS paper is always treated as a publish for comment rather than a full consultation, as EirGrid are not consulting on the methodology and purely publishing the calculated tariffs using the regulatory approved methodology. The standard timeline of a publish for comment document is 2 weeks and that is the timeline that will be provided in 2021 also.

3.2 Demand Response Aggregators of Ireland (DRAI)

In their response, DRAI were supportive of the proposed collaborative approach to customer engagement detailed in the [Stakeholder Engagement Plan 2021](#) and noted that DRAI's members acknowledge and agree with the range of benefits attributed to engagement set out in the plan and look forward to working with EirGrid in order to build stronger relationships.

3.2.1 Root and branch review, grid flexibility and awareness:

DRAI provided feedback that its members firmly believe that a 'root and branch' review of electricity regulation, code and market systems is required and would like to see a clear intention to conduct this review in this and future EirGrid Stakeholder Engagement Plans. DRAI also requested that the TSO allocate resource time to share perspectives and develop a detailed understanding of what is required to optimise grid flexibility and that they would support campaigns to raise specific awareness for the important role of flexibility in assisting the delivery of the renewable electricity targets.

EirGrid response:

We welcome the ongoing engagement with DRAI and the Demand Side Management (DSM) industry and we recognise the important role DSM plays now and will in the future. The Shaping our Electricity Future consultation sets out that DSM is a key enabler for the delivery of at least 70% renewables by 2030.

EirGrid and SONI will develop a Demand Side Roadmap to remove/reduce barriers to participation in energy, capacity and system services markets – this includes development of a Demand Side Strategy to break down barriers for industrial / commercial to participate in all markets. This will be evolved to residential demand side and help enable the requirements of EU regulations on consumer participation. It recognises that the DSOs are essential actors in enabling the participation of demand side and Shaping our Electricity Future commits to working with the DSOs and the industry to break down the barriers to allowing DSM to be active and effective participants in all markets. Flexible Network has also been identified as a critical enabler that we consider key to enabling cohesive market design changes and ensure alignment with operational requirements.

The Operational Roadmap to 2030 also calls out DSM and identifies for example that one key objective is to develop a framework for flexible network management that will seek to incentivise the supply and demand sides to provide flexible network services and alleviate network congestion. We encourage DRAI to engage in this consultation process to provide its views on the proposals.

Later this year the final roadmap for 2030 will be published and engagement on this roadmap will be included in future Stakeholder Engagement plans. We welcome DRAI's continued support for our awareness campaigns where we outline EirGrid's role at the heart of climate action. The campaign directed the public to accessible information that helps build public understanding of EirGrid's role and explains why grid development is essential to reach the target of at least 70% of electricity from renewable sources by 2030. DRAI's support for campaigns to raise specific awareness for the important role of flexibility has been raised with our Public Relations team. As set out in Shaping our Electricity Future, we recognise DSM is a key enabler for delivery of at least 70% renewable energy by 2030 and we welcome your insights and engagement.

3.2.2 Engagement with EirGrid during 2021:

DRAI expressed the view that, although the quarterly engagements with EirGrid are effective, there are on-going issues relating to market registration which have been highlighted as substantive barriers that limit the development potential of the demand side industry which this respondent feels warrants further engagement with EirGrid.

EirGrid response:

Market registration is one of a number of items that are being discussed with DSM and the feedback and inputs received are being used to inform the overall Demand Side Strategy as set out under Shaping our Electricity Future, as well as part of FlexTech. This allows a holistic approach for DSM development to ensure appropriate prioritisation of items to support delivery of our 2030 targets.

3.3 Energy Storage Ireland (ESI)

ESI thanked EirGrid for the opportunity to provide feedback on the Stakeholder Engagement Plan 2021. ESI welcomed the active engagement with EirGrid on the future DS3 system services arrangements and looks forward to continuing this engagement in 2021. ESI also welcomes the engagement in relation to the ESI pipeline survey and the opportunity to further engage with EirGrid on how the results from this can feed into areas of work such as the ECP-2 constraints analysis and the Tomorrow's Energy Scenarios reports. We note ESI's feedback on a consultation process from 2020. Learnings have been identified in our [2020 Stakeholder Engagement Report](#), and inform the implementation of our final [Stakeholder Engagement Plan 2021](#). All other feedback received from ESI has been addressed in the overarching themes above.

3.4 Irish Energy Storage Association (IESA)

IESA advised that they are generally supportive of EirGrid's plans for stakeholder engagement in 2021. IESA agree with EirGrid that effective engagement in an open and transparent manner can

only result in better outcomes for all – customers, industry, local communities and representative bodies.

3.4.1 Publication of meeting minutes:

IESA drew reference to the comprehensive list of energy industry stakeholders provided in the plan and requested that publication of the minutes of meetings, suitably redacted to exclude commercially sensitive information, with these stakeholders should be considered.

EirGrid response:

EirGrid does not consider the publication of minutes of meetings with energy industry stakeholders, as suggested in the consultation response, to be appropriate.

3.5 Wind Energy Ireland (WEI) (formerly Irish Wind Energy Association (IWEA))

As a member of the Commission for Regulation of Utilities' (CRU) NSEE Panel, WEI has welcomed and thanked EirGrid for the many positive steps and initiatives undertaken in 2020 in relation to stakeholder engagement in areas such as dispatch down, where new regular engagement channels with EirGrid have been beneficial, as well as the PR5 consultation process, ECP-2 and offshore wind connection policy.

3.5.1 Public engagement

WEI expressed support of the Education and Engagement Plan initiative and the need to gain support and acceptance for grid infrastructure developments, particularly at community level. WEI is hopeful that the PR5 allowances can facilitate more effective engagement and reduce or avoid delays to critical grid infrastructure projects that are needed to deliver our climate action targets. WEI offered availability to EirGrid to discuss this further and be of any assistance possible in supporting these messages, including the utilisation of their member's networks of Community Liaison Officers (CLOs) around the country. In addition, WEI advised that it fully supports this New Public Engagement Strategy for a Cleaner Energy Future and welcomes the fact that EirGrid is developing an engagement strategy for infrastructure delivery. WEI queried whether this strategy would be consulted on and made public.

EirGrid response:

EirGrid would like to thank WEI for their support on our engagement around grid infrastructure development. While at this time we don't believe it is appropriate to involve CLOs from outside of the business in these engagements, we thank WEI members for the offer.

[Our Public Engagement Strategy for a Cleaner Energy Future](#) was published on the EirGrid website in March 2021. This strategy outlines our new approach to public engagement in detail. Although a public consultation was not held, feedback from the National Advisory Council (NAC) and cross-functional sharing of customer and stakeholder feedback gathered through formal and informal channels was used to inform and shape the development and finalisation of this strategy.

3.5.2 Sustainability

WEI has requested that the TSO measure and report on energy market and non-energy market emissions as part of the existing quarterly dispatch down reports.

EirGrid response:

We are currently upgrading our wind and solar dispatch down reporting process and we will start issuing monthly reports from Q2 2021. The new monthly reports will be in Microsoft Excel format and will incorporate and replace both existing reports issued to customers on a quarterly basis; one of which is in pdf format (main report) and the other in Excel format (data sheet). This is to facilitate more efficient report production and to provide customers with more user-friendly reports and figures. This is in response to feedback from the industry and stakeholders expressing a desire to replace the current process with more frequent reporting.

CO₂ intensity and emissions data is currently displayed on the [Smart Grid Dash Board](#). At present, to integrate this into our dispatch down reports would require additional and significant changes. We are considering WEI's suggestion. It is being discussed internally and we will revert with an update via engagement on dispatch down.

3.5.3 Grid Capacity Forum:

WEI queried the establishment of a Grid Capacity Advisory Council to include the System Operators, CRU, industry representatives and other relevant stakeholders. WEI would not intend that this would be a project specific forum, rather it would discuss and develop overall grid policy for the island.

EirGrid response:

In 2021, Eirgrid plans to broaden the existing DS3 Advisory Council to encompass Operations, Network and Market aspects, the three key areas of *Shaping Our Electricity Future*.

3.5.4 Sharing of consultation feedback and Grid Design Specifications:

WEI notes that it would welcome the sharing of industry consultation feedback that occurs throughout all functions of our organisation. WEI also noted that it feels there is substantial variation in how EirGrid engages in relation to design specification changes which often have a material impact on industry. WEI proposes that consistent engagement, where there is a material impact on projects, should become the standard adopted for changes to future grid design specifications.

EirGrid response:

Eirgrid endeavour to share feedback with other relevant areas of the organisation. Our internal reorganisation in 2020 has been designed to optimise delivery of the 2020-25 Group Strategy and at least 70% of electricity from renewables by 2030. This has supported the sharing of relevant information within the organisation. To further enhance this, transparency and sharing of stakeholder engagement information,

including stakeholder feedback, across the organisation is a key focus of our enhanced stakeholder engagement governance.

EirGrid reviews its functional specifications and standard designs on a continuous basis. Eventually, and in all cases, a stage is reached where it is deemed appropriate that a revision be published. In recent times we have flagged to the industry via the EirGrid Group website those standards that are currently under review with the intention of issuing a revision.

EirGrid recognises that changes to functional specifications and standard designs can have “a material impact on projects” and that in those circumstances it is appropriate to engage with the industry in advance of the publication of any such new or revised standards. It was on that basis that EirGrid, in November 2020, published a new policy that addresses the matter. The [Engagement process for development and update of technical standards and policies](#) is available to view on the EirGrid Group website.

3.6 UCD Energy Institute (UCDEI)

UCD Energy Institute has regular engagement with EirGrid as a key stakeholder in our research activities and welcomed the opportunity to engage in this consultation process. All feedback received from UCDEI has been addressed in the overarching themes above.