

EirGrid Stakeholder Engagement Report 2021

Consultation Response Paper

17th May 2022



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1. Introduction

This paper (the 'Consultation Response') provides a detailed overview to the feedback received during the public consultation of EirGrid's review of stakeholder engagement activity during 2021. This document includes EirGrid's response to feedback received to our draft report. The [consultation on the draft Stakeholder Engagement Report](#) ran from the 1st April to 3rd May 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. EirGrid is constantly seeking to improve our processes for engagement and consultation and we therefore appreciate all feedback received.

The aim of the Consultation Response Paper is to summarise the responses we received during the consultation process, and to explain how we will respond to this feedback. The Consultation Response Paper, together with our 2021 Stakeholder Engagement Report and our presentation to the Networks Stakeholder Engagement Evaluation (NSEE) Panel, comprises our submission to the NSEE Panel for 2021.

This review process is carried out in the context of the annual external evaluation carried out by the NSEE Panel. The NSEE process was established in PR4 and has been retained by the Commission for the Regulation of Utilities (CRU) for the PR5 period, in accordance with the PR5 Regulatory Framework, Incentives and Reporting (CRU/20/154). This evaluation is an independent analysis of the effectiveness of EirGrid's stakeholder engagement, and we welcome the objective insights and learnings from this evaluation.

In developing the 2021 Stakeholder Engagement Report, EirGrid was cognisant of the criteria for assessment that was set out in Annex 14 of the CRU/20/154. The criteria set out a requirement to demonstrate, with evidence, the presence of the following:

- a comprehensive, up-to-date stakeholder engagement strategy, and management systems and processes within the business to enable its delivery;
- a delivered set of channels and initiatives for engaging with stakeholders, consistent with the documented strategy; and
- demonstrable positive impacts on stakeholders, stakeholder groups or the business consequent to the delivered channels and initiatives.

In 2021, EirGrid demonstrated a clear step change in our approach, methodology and channels of stakeholder engagement.

We ensured that this evolution in our stakeholder engagement was in line with our principles; how we identify stakeholders and how we work to involve them in key decisions.

In the face of on-going public health restrictions, much of our engagement remained on-line, and, cognisant of this, EirGrid endeavoured to be innovative to ensure that our stakeholders could benefit from impactful engagement on key and critical issues.

The Stakeholder Engagement Report contains a review of EirGrid’s stakeholder engagement activities during 2021. We believe that we clearly demonstrate how working together with all stakeholders – customers and industry, the public and local communities – leads to better and more impactful and inclusive outcomes that reflect all views.

This Consultation Report

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

- Bord Gáis Energy (BGE)
- Energy Storage Ireland (ESI)
- Wind Energy Ireland (WEI)

We would like to thank all those who responded to this consultation. Some comments related to matters of individual policy and, as a result, are not specifically within scope and have not been addressed in this document

Several common themes were raised in the submissions we received, which we comment on in this response. We have addressed below how these themes have been incorporated into our final 2021 Stakeholder Engagement Report.

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.** The respective respondents raised some specific points which are not specifically covered in the updated 2021 Stakeholder Engagement Report or under the overarching themes or and these are addressed here.

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 Report for 2021. The improvements to our stakeholder engagement that we have implemented were acknowledged by respondents, who also welcomed the additional clarity that our Stakeholder Engagement Report has provided to strengthen our stakeholder engagement. While welcoming this feedback, we recognise that there are areas which could still be improved and that our stakeholder engagement is a process of continuous improvement.

We have updated our [2021 Stakeholder Engagement Report](#), which was published on our website on the 17th of May 2022, to include feedback that we received from our stakeholders around transparency and the timing of our engagement.

2.1 Requests for accessibility of information

A number of responses we received to our Stakeholder Engagement Report 2021 have outlined the need for EirGrid to improve and enhance the accessibility of information for our stakeholders – mainly regarding our website and the need to enhance its functionality and database for project updates.

EirGrid response:

Work is underway on the eirgridgroup.com website and the search functionality is a matter of priority. In the interim, we are seeking to make the website more user-friendly while still providing the most up to date information possible.

The website redevelopment will also address improvements made to the 'Grid' development and projects section of our website.

2.2 Enhanced industry engagement

EirGrid received a number of requests from consultees to update and engage stakeholders on Hybrid Sites and on other relevant work areas within *Shaping Our Electricity Future*, such as DS3.

EirGrid response:

EirGrid recognises the importance of consistent and open engagement with industry on a number of areas which our consultees have highlighted.

The recent launch of the *Shaping our Electricity Future* Advisory Council will address these areas 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.

EirGrid would encourage and welcome our stakeholders to participate in the Council and openly engage with us on the programme. Stakeholders can find more information on how to join the council through our open letter¹, available on the EirGrid website.

The Hybrid Working Group of which EirGrid and the DSO are members published their response to the [Multiple Legal Entities consultation report](#) in April 2021 which provided feedback on hybrid projects and connections.

EirGrid is continuing to work with the DSO and other stakeholders to deliver the various hybrid technology-related actions set out under Action 125 in the Climate Action Plan 2021.

3. Specific Consultee Comments

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

Bord Gáis Energy (BGE)

BGE highlighted that the 2021 Report reflects the focus EirGrid has given to engaging with stakeholders over 2021 and the changes to engagement resulting from feedback provided to EirGrid including the recommendations of the Network Stakeholders Engagement Evaluation (NSEE) Panel Close-Out Report for 2020 is a positive. BGE welcomes the improvements noted to EirGrid's website including the development of the new online consultation portal to address many of the recommendations of the NSEE Panel in 2021.

We outline our response to the main points raised by BGE - where not previously addressed in the overarching themes (above), or in our final Stakeholder Engagement Report 2021.

BGE welcomed the evidenced implementation of recommendations from the NSEE Panel in the 2021 Report but felt that some recommendations have not been sufficiently addressed, including the following:

- Evidencing how EirGrid handle and process stakeholder feedback, and use it to inform decisions and the rationale used where stakeholder feedback is not considered in decisions:

EirGrid response:

EirGrid recognises the importance of stakeholder feedback and the transparency around sharing how such feedback is used to inform decisions. The stakeholder portal at consult.eirgrid.ie was piloted for the Shaping Our Electricity Future consultation in Q2 and Q3 2021. The portal allowed the public to respond to our approaches, and industry stakeholders to provide a wide range of feedback covering the technical elements of the markets, networks and operations of the electricity system.

We believe that the lessons learned from the use of the portal and how we presented feedback to industry and the public will be of benefit in the future. We are committed as

¹ <https://www.eirgridgroup.com/site-files/library/EirGrid/SOEF-Advisory-Council-Expressions-of-Interest-letter.pdf>

part of our 6-step grid development framework to demonstrate how feedback is incorporated and if it cannot be, how and why not.

In addition to this, EirGrid has set out within the [Moderation Policy](#) on our Consultation portal more information regarding how feedback we receive to consultations is moderated. We are currently working to ensure that commercial sensitivity is respected and all comments within scope are published accurately.

BGE note the need for continued improvement to EirGrid’s consultation portal:

- **BGE comment that not every consultation in 2021 is captured on the portal, even those issued later in the year such as the TSO Incentives Framework multi-year plan (2022-2025) or the Transmission Development Plan 2021 which were scheduled in H2 2021.**

EirGrid response:

The EirGrid Consultation portal was initially launched in line with facilitating the *Shaping Our Electricity Future* in March of 2021 consultation and feedback which took place in Q3 of 2021. The consultation portal has since then been used to trial non-grid related consultations on an ad-hoc basis. We will continue to work to build the capacity of the portal and look forward to using the consultation portal going forward for all project consultations as a way to enhance our stakeholder feedback process.

- **BGE request that EirGrid’s feedback and decisions on closed consultations is addressed in order to close feedback loops for stakeholders**

EirGrid response:

EirGrid acknowledges the importance of closing feedback loops for our stakeholders. We will be introducing functionality on our consultation portal to include an ‘outcome’ feature, which will show stakeholders how the consultation feedback has informed the final document. EirGrid is working on future developments with our portal to include notifications also as a way to enhance our stakeholder feedback process.

- **BGE note that the consultation panes are not correctly capturing the submissions made**

EirGrid response:

EirGrid will investigate and rectify this issue as submissions should be captured in all cases.

- **BGE encourage EirGrid to promote the use of the consultation portal by making the portal’s presence a main feature on EirGrid’s home site page and providing a direct link for website users to access the consultation portal.**

EirGrid response:

We acknowledge and appreciate that we need to do more to promote the portal and will seek ways to do so.

EirGrid has made efforts to showcase the consultation portal on our [eirgridgroup.com](#) home-page under the title ‘Consultations’. The home-page brings users directly to the

consultation portal landing page which showcases our consultation library. Users can see from this page consultations that are open, upcoming and closed.

- BGE ask **EirGrid to keep stakeholders updated on the status of the SEM-GB Trading Arrangements on a regular/ quarterly basis:** The 2021 Report does not provide an update on EirGrid's activities for, or engagement with, stakeholders on alternative forward arrangements on the interconnectors. We appreciate that a decision is awaited from a recent consultation by the SEMC Committee on this topic.

EirGrid response:

As always, we are committed to sharing relevant information when it becomes available. Although EirGrid and EirGrid Interconnector Designated Activity Company (EIDAC) have been party to numerous discussions surrounding utilisation of interconnectors since the beginning of 2021, there have been very few recent developments to share details of.

We will continue to provide updates on this topic at the Market Operator User Group (MOUG) meetings as they arise. As the respondent notes the final trading arrangements will be subject to the decision of the RAs. EirGrid will continue to engage on any consultations on this topic.

- **BGE have requested more information on the TSO/ DSO alignment plans and expected outputs and benefits:** *"The 2021 Report however does not seek to quantify the benefit to grid customers of this collaboration. We ask EirGrid to provide focused metrics to quantify the benefit to stakeholders from the SO's partnership so incorporating Recommendation 10 from the NSEE Panel Report for 2020."*

EirGrid response:

The collaboration and synergies between TSO/DSO are outlined in detail in Section 7.9 and 8.12 in the Commission for Regulation of Utilities (CRU) Price Review 5 (PR5) Decision Paper on the Regulatory Framework, Incentives and Reporting (CRU/20/154)². The CRU published an information paper on the 2021 Incentive Balanced Scorecards in March 2022³. The TSO and DSO published a joint multi-year plan covering 2022-2026 for public consultation in October 2021⁴. The System Operators will continue to publicly consult on a joint multi-year plan on an annual basis as set out in CRU/20/154.

EirGrid and ESB Networks are looking 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

² <https://www.cru.ie/wp-content/uploads/2020/12/CRU20154-PR5-Regulatory-Framework-Incentives-and-Reporting-1.pdf>

³ <https://www.cru.ie/wp-content/uploads/2022/03/CRU20226-2021-Balanced-Scorecard-Information-Paper-1.pdf>

⁴ <http://www.eirgridgroup.com/site-files/library/EirGrid/DSO-TSO-Joint-Incentive-Multi-Year-Plan-Consultation-Paper.pdf>

where appropriate for key projects due to complexity and risk to delivery timeline. This has already commenced for a number of current projects.

Energy Storage Ireland (ESI)

ESI thanked EirGrid for the opportunity to provide feedback on the report. ESI welcomed the constructive engagement with industry in 2021 in areas such as DS3 system services contracting, system services future arrangements and the SOEF (Shaping our Electricity Future) consultation.

ESI also provided constructive feedback in a number of areas in their response. We have responded below to this feedback where not already addressed in the updated report for 2021 or in the overarching themes above.

- **ESI request more information on an industry guidance note regarding Dispatch**

EirGrid response:

EirGrid is still planning to publish an industry guidance note within the 2022 time-frame. The industry guidance note has also been addressed in the *Shaping Our Electricity Future* Advisory Council meetings. We would welcome and encourage stakeholders to attend the Advisory Council meetings to engage with EirGrid openly and to receive updates on the status of *Shaping Our Electricity Future*.

- **ESI had previously submitted a request for additional flexibility in procurement of DS3 system services in December 2021:** ESI would ask that EirGrid continue to take this letter into account when choosing a testing deadline date for gate 7 of the DS3 tenders as many of our members continue to experience delays due to various supply chain/Covid-19 factors in 2022.

EirGrid response:

EirGrid have addressed this issue in previous Procurement Gates and various bidders information meetings throughout 2021. It is the TSOs' experience from previous Procurement Gates that many system services providers have adapted to the new environment arising due COVID – 19. EirGrid and SONI will endeavour to continue to be as flexible as we can with regard to testing for all system service providers for Gate 7, this includes practices such as facilitation of remote commissioning and testing as well as prioritising system services testing over Grid Code testing. Measures such as these have proved very effective in previous gates, in particular for large scale battery projects.

Gate 7 is expected to launch in mid-late June 2022. The testing deadlines for Gate 7 will be consistent with previous Procurement Gates, these are set to ensure that all necessary processes are completed so that contract execution can take place on 01 October 2022. All tender submissions are treated equally irrespective of circumstances, we therefore cannot facilitate any extensions to testing deadlines.

Wind Energy Ireland (WEI)

WEI welcomed the opportunity to engage with EirGrid and provide feedback on our Stakeholder Engagement Report 2021. WEI recognise the significant amount of work that went into developing the SOEF consultation and roadmap and the efforts put into engaging with industry and with communities during the process. WEI also appreciate the responses given to industry feedback during and after the SOEF industry webinars.

WEI also provided constructive feedback in a number of areas in their response. We have responded below to this feedback where not already addressed in the updated report for 2021 or in the overarching themes above.

- **Customer Survey** - We welcome the continuation of the EirGrid customer survey and we look forward to seeing the results in the final 2021 report including how feedback from customers will be incorporated into ongoing work practices. This is a good opportunity to identify what works and what could be improved.

EirGrid response:

EirGrid acknowledge the importance of our Customer Survey as a way of taking direct feedback from this important stakeholder group.

In February 2022, a survey was issued 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. The results of the survey are outlined in more detail in our final Stakeholder Engagement Report 2021.

- **WEI feel there is improvements to be made on the reporting and engagement around Dispatch Down:** WEI believe Dispatch Down is an area that should be included in the reporting in terms of further information for stakeholders. The WEI Dispatch Down Working Group engage with EirGrid on a monthly and quarterly basis, while EirGrid also facilitate other forums and workshops throughout the year which include topics relating to the dispatch down of wind farms. The working group would like to take this opportunity to thank EirGrid for the regular, helpful and informative engagement, and in particular thanked two individual members of staff.

EirGrid response:

EirGrid thank WEI for acknowledging the engagement efforts made by EirGrid to inform our stakeholders throughout the year on relevant topics discussed in their response.

The feedback which WEI have provided with regards to suggestions to enhance our engagement going forward has been circulated to the relevant teams within the business. EirGrid is dedicated to taking this feedback on board and collaborating with the WEI Dispatch Down Working Group in the monthly and quarterly meetings to discuss the suggestions in more detail and what improvements can be made to our reporting and engagement methods.

4. Conclusion

EirGrid thanks all those who responded to this consultation, which was specifically to receive feedback on our stakeholder engagement report for 2021.

All responses were reviewed and considered and where possible, we have incorporated feedback into the final Stakeholder Engagement Report for 2021. In addition, relevant feedback that was not incorporated in our 2021 Stakeholder Engagement Report has been noted and will be considered for our future plans, as we continue to enhance our engagement.