EirGrid Stakeholder Engagement Report 2019

Consultation Response Paper

7th May 2020

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Introduction

This paper (the 'Consultation Report') sets out the feedback received during the public consultation of EirGrid's review of stakeholder engagement activity in 2019. The EirGrid Stakeholder Engagement Report 2019[1] consultation ran from 13th March 2020 to 24th April 2020.

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. We appreciate all feedback received and can confirm that EirGrid is constantly seeking to improve our processes for engagement and consultation.

This review process is carried out in the context of the annual external review carried out by the National Stakeholder Engagement Evaluation (NSEE) Panel. This was established by the Commission for the Regulation of Utilities (CRU) in their Reporting and Incentives under PR4 Decision (CER/18/087). This review 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 Stakeholder Engagement Report 2019, EirGrid was cognisant of the criteria for assessment that was set out in Annex E of the CER/18/087 to guide Panel Members. The criteria set out a requirement to demonstrate, with evidence, the presence of the following:

- 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.

The aim of this Consultation Report is to summarise the responses we received during the consultation process, and to explain how we will respond to this feedback. This Consultation Report, together with our Stakeholder Engagement Report 2019 and our presentation to the NSEE Panel, comprises our submission to the NSEE Panel for 2019.

Our approach to engagement

Throughout 2019, we undertook an extensive process of engagement across the electricity sector to help inform our EirGrid Group Strategy for the next five years. Our renewed approach to engagement is captured in two key supporting goals of the subsequent strategy: Engage for better outcomes for all, and work with partners for positive change. Our aim is to achieve world-class standards, and to deliver better results for all stakeholders as a consequence. In order to achieve the scale of transformation required by climate change we will require significant increases in the

[1] http://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Stakeholder-Engagement-Report-2019-Final.pdf

scope and frequency of our stakeholder engagement. Reviewing our stakeholder engagement helps us improve this work for future years – which is essential.

We have made significant progress in our stakeholder engagement, as demonstrated in our 2019 report and in our responses below. However, stakeholder engagement requires continuous improvement in order to evolve with changing environments and to deliver the scale of change required. In our Price Review 5 (PR5) submission to CRU, we proposed to significantly enhance our engagement over the next five years, subject to CRU approved funding. The feedback and learnings from all of our stakeholder engagement played a key role in the development of these planned initiatives. Learnings from previous engagement has also allowed us to improve our process, and so achieve better outcomes for all. We understand we have much work to do in this area, and we want to work with our stakeholders to deliver change in the most effective way.

This Consultation Report

Responses were received from the following organisations:

- Bord Gáis Energy (BGE)
- Demand Response Aggregators of Ireland (DRAI)
- Energy Storage Ireland (ESI)
- ESB Generation and Trading (ESBGT)
- Irish Wind Energy Association (IWEA)
- UCD Energy Institute (UCDEI)
- Western Development Commission (WDC)

Thank you to all those who responded to this consultation. A number of points in the responses received relate to the Stakeholder Engagement Report which is the subject of this consultation. A number of comments received relate to matters of individual policy and are not specifically within scope as a result. Nonetheless, we have taken the opportunity to take account of a number of these in the spirit of open engagement.

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

- **Overarching Themes**. 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 a number of specific points which are not covered under the overarching themes and these are addressed here.

EirGrid looks forward to continued engagement with stakeholders and the NSEE Panel to optimise our stakeholder engagement strategy in future.

Overarching Themes

In general, respondents acknowledged that EirGrid has implemented improvements to stakeholder engagement in 2019. Respondents also welcomed the additional clarity from our Stakeholder Engagement Plans to strengthen EirGrid's stakeholder engagement. EirGrid appreciates this feedback and accepts that there are areas which could still be improved.

We believe that stakeholder engagement succeeds when we make informed decisions based on relevant insights from a broad cross-section of stakeholders. We recognise our need to further develop awareness and trust, and to engage in an open and transparent manner with stakeholders, communities, and businesses. We want to ensure that those who are affected by our activities are afforded the opportunity to engage with us in a meaningful way. We want to ensure all stakeholders have input into our decision-making, and that they understand how their contributions influenced our final decisions. We believe this will achieve better outcomes for all.

1. Measuring Success

While all respondents provided positive feedback on EirGrid's engagement in 2019, three respondents outlined that our Stakeholder Engagement would benefit from the introduction of metrics. These respondents made the case for objective measurements to evaluate progress, demonstrate success and to make improvements. ESBGT also commented that a shift away from engagement-focused KPIs to delivery-focused KPIs would be a better means of judging successful engagement.

EirGrid Response: We welcome this feedback. While the improvements we have made this year have been recognised by respondents, we agree it would be good to further evaluate the benefits delivered by these improvements. Going forward, we will implement some form of objective assessment that is useful and meaningful to both EirGrid and Stakeholders. We will gather more structured feedback, such as through customer surveys. As well as providing feedback on initiatives this will also allow us to measure the success of operational engagements such as regular and ad hoc engagements with customers as well as more formal fora such as the Grid Code Review Panel.

While our overall Stakeholder Engagement is qualitatively assessed on an annual basis by the NSEE Panel, engagement specific assessments will allow us to learn from feedback, identify improvements and demonstrate our successful engagement more objectively on an annual basis. In addition, we are engaging with the CRU on the engagement initiatives that we are planning for the next 5 years, and an appropriate performance evaluation mechanism for stakeholder engagement, under the PR5 framework. We encourage all stakeholders to participate in the consultation on these plans when it takes place.

2. Transparency

Respondents recognised the accessibility of our approach to engaging with stakeholders. However, some asked for more transparency. In particular, there was a request for greater transparency on how parties' feedback is considered and how this influences EirGrid's decisions, and for a greater understanding of how decisions are made and approved within the organisation. One respondent

also requested that EirGrid consider publishing all recommendation papers presented to the Regulatory Authorities in advance of those authorities making their decision.

EirGrid response: Later in 2020 we will publish a Stakeholder Engagement Framework. This framework will set out how we engage with customers and industry stakeholders to enhance understanding of our processes, building on the principles and the steps for stakeholder engagement already included in our Stakeholder Engagement Plans and Reports. This framework will include the key areas of engagement and points of contact across the organisation. In addition, it will contain information on engagement decision-making to demonstrate how feedback is incorporated and shared to ensure better outcomes for all.

Where EirGrid undertakes a consultation, we continue to work to bring a consistent approach to timely publication of consultation reports and final decision papers. EirGrid does not consider the publication of recommendation papers presented to the Regulatory Authorities in advance of those Regulatory Authorities making their decision to be appropriate.

3. Improving our Engagement

Overall, respondents have welcomed the improvements that EirGrid has made in stakeholder engagement in 2019. EirGrid has a "continuous improvement" approach to stakeholder engagement and is always open to constructive suggestions on making future engagement more effective, fair and objective.

The National Advisory Committee

Several respondents have asked for more information on EirGrid's National Advisory Committee.

EirGrid response: The National Advisory Committee consists of a cross-section of external stakeholders from national groups encompassing areas including civil society, business groupings, academia, industry, NGOs as well as representatives with landscape backgrounds. The purpose of the National Advisory Committee is to offer an independent and expert opinion to EirGrid. Its work relates to activities that are key to grid development, and on other aspects of our business that have a direct bearing on the citizens of Ireland. EirGrid recognises the need to obtain feedback on our work from a cross-section of Irish society and economy. The National Advisory Committee provides a valuable forum to explore wider issues that relate to our work. It is important to note that while EirGrid senior management attend the National Advisory Committee, the committee itself is neither a policy-making nor a decision-making body.

Innovation: Learning from others and implementing best practise

One respondent has asked for further information on innovative approaches to stakeholder engagement considered in 2019. In particular, they asked for information on the scope of the improvements expected from these innovations, and the specifics of the associated changes expected as a result.

EirGrid response: We engaged throughout 2019 with TSOs and other relevant organisations to better understand their approaches to customer and stakeholder engagement. These contacts took place at the same time as we talked to key stakeholders in Ireland and Northern Ireland to assess their view of our approach to engagement. We gained insights from both processes that

contributed to our EirGrid Group Strategy for 2020-25. In addition, these insights were also used to develop a range of engagement initiatives in our PR5 submission. These initiatives cover our enhancements to engagement over the next five years, subject to CRU approval of appropriate funding. They include a number of areas:

- Education and Engagement, designed to support acceptance at all levels for grid infrastructure projects;
- Enhanced Customer Journey, which proposes to improve and streamline the processes for new connections to ensure an efficient and effective process from initial enquiry through to commissioning; and
- Framework for Development of the Grid, to ensure continued development and improvement of the framework, which will be critical to enable us to deliver the required infrastructure to meet our 2030 targets.

Stakeholders are encouraged to engage with the CRU consultation process on PR5.

Lessons learnt

In our Stakeholder Engagement Report 2019, we detailed the key lessons learnt. These were well received. Some respondents explicitly welcomed specific learnings. These included maintaining informal and formal feedback channels, and the development of processes for improving communications on transmission outages that impacted customers. One respondent sought further clarity on gaps in engagement that were identified during 2019, and on actions taken to close these gaps and also commented that they would like to see corrective actions specified for each lesson learnt.

EirGrid response: In 2019 we aimed to expand customer and industry engagement while maintaining our grid development engagement. This focus on customers saw renewed emphasis on providing them with direct engagement routes through designated account managers. We also introduced customer clinics for early engagement on new connections. In addition, we have increased engagement on areas such as dispatch down. We have also outlined in our Stakeholder Engagement Report 2019 the changes we intend to make because of feedback received. We have also introduced new initiatives, such as FlexTech, to address needs identified through our engagement with industry and to recognise the need to work with partners for positive change.

We are piloting enhancements to our customer and industry engagements based on best practise and feedback. This includes learnings from Tomorrow's Energy Scenarios. As per our 2019 Plan and detailed under Transparency, later in 2020 we will publish a Stakeholder Engagement Framework.

In 2019, we also built on the recognised efficiencies of collaboration and engagement with industry representative bodies. For example, regular engagement with the Demand Response Aggregators of Ireland (DRAI) was implemented in 2019. In their response to the consultation, DRAI noted our considerable efforts and welcomed this evolving approach to collaboration. We are continuing in 2020 to build on this regular engagement with industry representative bodies.

We acknowledge that in our Stakeholder Engagement Report 2019 specific corrective actions are not called out in the summary section and will look to address this in future reports. This summary was developed from specific learnings as highlighted in individual case studies. These were

selected to reflect a balanced view of our successes and learnings in stakeholder engagement in 2019. In a number of cases, the learnings in the case studies outline the corrective actions we are taking, if required. We recognise the need to explicitly call out corrective actions if they are not self-evident from the context of the case study and our response.

4. Connecting customers

One respondent outlined that improvement around the Connection Offer Process (COP) would be beneficial. Another highlighted the importance of early and consistent engagement with developers during the connection process, including availability of information for customers and the introduction of KPIs for this process.

EirGrid response: EirGrid welcomes this feedback and is working to continue to build on the improvements implemented in 2019 in this area. This included the introduction of customer clinics and our input to the pre-ECP2 consultation engagement.

We have taken on board previous feedback in this area and learnt from our review of best practise from other TSOs. In response we are working to enhance our pre-application engagements and the connection offer process, subject to CRU-approved funding. Our Customer Journey initiative in our PR5 submission outlines potential improvements for customers seeking connections to the transmission system and should improve the overall customer experience. The changes planned include the development, implementation and publication of a defined pre-application process for customers. This process will provide greater transparency for prospective customers considering connecting to the transmission system

To improve the information available to customers, we plan in PR5 to improve the availability and accessibility of up-to-date information. Heat maps on system capacity by location will be developed and made available online for customers. This will provide a more transparent customer service for connecting parties. Providing more up-to-date system information on grid capacity for prospective customers will require several actions by EirGrid. This will include maintaining and updating detailed transmission system data and connection information. We will also need to undertake detailed and regular system studies for multiple nodes around the transmission system.

All these initiatives are subject to approval of appropriate funding from the CRU as part of the PR5 process. We will engage with the CRU during the PR5 process on an appropriate performance evaluation mechanism for stakeholder engagement.

5. Website and Online Resources

EirGrid's website was a recurring theme amongst respondents, with comments relating to accessibility of consultations, updates on grid development projects and documents in our library. One respondent suggested strengthening online engagement resources, considering the new ways people are working in the current pandemic.

EirGrid response: There is a vast amount of data and documentation now available on our website, and we acknowledge the need to improve how this can be accessed. We have created a new

Stakeholder Engagement webpage, which encompasses comprehensive lists of all publications, consultations and various fora such as planned workshops and webinars. In addition to the above, we have made other improvements to the EirGrid website including a new Landing Page containing commonly used transmission policies, functional specifications and drawings of interest to customers. This information may prove useful to customers seeking a connection to the transmission system, especially those in the early project development stages.

Later in 2020 we will be starting a process of analysis and review to further upgrade our website. 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. All these initiatives are subject to receiving satisfactory funding.

The search functionality is a matter of priority during our review of the website. In the interim we are looking into ways which we can make the website more user-friendly while providing the most up to date information possible.

6. Flex Tech

Some respondents outlined that our DS3 communication was positively handled and clear. The DS3 Advisory Council was noted as a good example of engagement and collaboration with industry. However, some respondents outlined that they would like to see this approach applied to other areas – such as FlexTech. They believed this approach could be used to improve clarity around stakeholder engagement on the Flex Tech initiative. This could include the structure of industry forums and consultations. In addition, it was suggested that EirGrid review the learnings to date and consider how they could inform the wider FlexTech structure.

EirGrid response: EirGrid welcomes the feedback from industry in relation to the FlexTech initiative. We recognise the need for further engagement with industry at a working group level. This will vary between working groups depending on the deliverables in a given year and specific topics. We intend to hold an annual FlexTech consultation and two fora each year, to provide all stakeholders with the opportunity to have their say. At the first forum, we shall confirm the content and priority areas of the working groups and the associated deliverables for the coming 12 months. We will also outline priorities for the coming three years, report on progress to date and publish the response to the previous consultation.

In addition, where a need is identified, we shall seek nominations of experts through the DS3 Advisory Council and industry fora to provide input at a working group level. We shall also engage with the DS3 Advisory Council on a quarterly basis, which will commence once our consultation response has been published. It is our intention to continue with an advisory process similar to the DS3 Advisory Council for the future programme of work that will facilitate 2030 renewable generation targets.

Further details on the structure and engagement will be provided within the response to the FlexTech consultation that will be published in Q2 2020. In addition, the short, medium and long-term deliverables of each FlexTech working group will be outlined. It should also be noted that the working groups and deliverables may change as the initiative progresses.

7. Industry Engagement on Grid Development

Several respondents expressed the view that additional customer and industry engagement on grid development would be beneficial.

EirGrid response: EirGrid has made exponential efforts to improve our public communications and engagement in recent years. Given the significant developments needed in the next decade, we agree that there is need to collaborate with customers and the wider electricity sector. Consideration is being given to the most effective ways of engaging with key stakeholders to achieve our 2030 targets.

8. Early Engagement

Respondents asked for EirGrid to start a process of engagement earlier in our decision-making process. It was argued that this would allow stakeholders to have a greater and more meaningful role in integrating new technologies and influencing plans before proposed solutions are presented for consultation. Respondents also advised that they fully support any initiatives that EirGrid suggests to facilitate early stage engagement on a proposed development before the formal consultation process, such as discussion papers or dedicated working groups. Some respondents noted that early engagement on our Stakeholder Engagement Plan for the year ahead would be welcome.

EirGrid response: We agree with this feedback, as experience and insights highlighted that proactive and early engagement delivered better results. We welcome participation of all customers and industry stakeholders in future work. We will continue to engage through the regular meetings and advisory processes such as the DS3 Advisory Council. The 2020 Stakeholder Engagement Plan sets out a range of formal engagement opportunities, and we will also provide updates on any additional opportunities to stakeholders as they arise. Consideration is being given to the most effective ways of engaging with key stakeholders to achieve our 2030 targets.

To ensure that we continue to enhance our Stakeholder Engagement, we will be consulting on our Stakeholder Engagement Plan for the forthcoming year at the end of the previous year, as outlined in our list of planned consultations for 2020.

Specific Consultee Comments

As stated above, EirGrid received a total of seven consultation responses on its Stakeholder Engagement Report 2019.

This section provides detail on the aspects of the consultation responses not covered in the previous section and provides our replies to the feedback received.

Bord Gáis Energy (BGE)

BGE commented that their engagement experience in 2019 with EirGrid has been a positive one and noted helpful public engagement sessions, facilitation of bilateral meetings and increased clarity around our process of engagement. BGE's response encompasses their review of EirGrid's stakeholder engagement approach against the assessment criteria set out by the CRU in CER/18/087. Through this lens BGE have raised a number of points. Below, EirGrid has set out our response to the main points raised by BGE where not previously addressed earlier in this report.

- **Case Study Selection**: BGE requested evidence of alignment of stakeholder needs to business strategy and operations for 2019.

  EirGrid response: The needs of our stakeholders gathered through extensive engagement in 2019 provided key insights used in the development of our EirGrid Group strategy, as set out in Case Study 4, and for a number of the initiatives contained in our PR5 submission to CRU.

- **Case Study Selection**: BGE requested clarity on the process used to select the projects for consultation and the reasoning behind the different approaches used in reporting them in the 2019 Review.

  EirGrid response: Our Stakeholder Engagement Report 2019 captures the breadth of EirGrid's engagement with customers, industry and other key stakeholders. We outline EirGrid's engagements in 2019 with customers and industry as well as an overview of the outcome of engagement on each of the five Grid Development projects where stakeholder engagement took place as they progressed through the six step process. In the Appendix we set out 20 public consultations and the 14 types of EirGrid hosted industry fora and working groups with associated outcomes covering a broad range of topics.

  The case studies have been selected to allow us to demonstrate our stakeholder engagement processes through an in depth look at five distinct examples of engagement from 2019. These have been chosen to encapsulate a broad spectrum of our engagement with our customers, industry and stakeholders. In choosing these case studies we were mindful of feedback from consultation and the NSEE panel last year and have sought to reflect a balanced view of our successes and learnings in stakeholder engagement over 2019.

- **Celtic Interconnector:** BGE noted that they have provided a response to the Celtic Interconnector 2019 consultation. In advance of feedback from EirGrid, BGE would like to understand the process for the issues and concerns raised by BGE and timelines on the expected response.

EirGrid response: The BGE submission in response to the Celtic Interconnector Step 3 public consultation process was received in June 2019 and taken into consideration at this time. The Step 3 Consultation Report and Step 3 Consultation Response Document issued in September 2019 acknowledged all concerns raised during the consultation process. All concerns raised, including those of BGE, informed the project development, the next steps of which were communicated in the Celtic Interconnector – Step 3 Preferred Options Report also published in September 2019.

- **Cross Shannon 400 kV Cable**: BGE requested further understanding of how feedback received during engagement was incorporated into the final route selection.

  EirGrid response: As noted in the BGE consultation response, EirGrid's consultation process occurs in the context of the six-step process for Grid Development. Public consultation is an intrinsic part of each project development strategy. The preparation of a Consultation and Engagement Strategy for each project is part of the framework, whereby the needs of stakeholders can be identified and a strategic approach to consultation and engagement is formulated to integrate with the project development process and to ensure value for all parties.

  In respect of this project, individual stakeholder concerns were recorded and considered in the multi-criteria analysis and decision-making in identifying the best performing option. The final option avoids to the greatest extent the issues which were of concern to the stakeholders. Where a concern cannot be fully avoided for any reason, this was conveyed to the stakeholder, and the design of development was mitigated to minimise potential adverse impact.

- **North Connaught 110 kV:** BGE requested further clarity on the identified engagement learnings and how they will be used going forward. They asked that these learnings are presented for stakeholders to consider whether the project's engagement outcomes demonstrate positive impacts this engagement had for the stakeholders identified.

  EirGrid response: Key learnings from the initial engagement process included the need to give weight to the need to facilitate renewable generation, to harness the value of elected representatives and council officials in disseminating messaging, that efforts will be needed to build trust with communities, and how this will best be achieved by community-level liaison.

  These have now been incorporated into the project Consultation and Engagement Strategy, which will be reviewed and updated throughout the various steps of the project development process. That initial engagement has also fed in, where applicable, to the Step 4A report which will be published for public review as part of the next engagement event focused on the identification of areas of opportunity/route corridors.

  Given the project is still at an early stage of development, the feedback we have received demonstrates the positive impact for stakeholders - which is their acknowledgement that we are being open and transparent and are committed to ensuring proactive and meaningful engagement throughout the process. Feedback from consultation events, and the value of any such feedback and how it is taken into consideration in our ongoing project decision-making process, is captured in Consultation Reports, and other related documents, all of which are made available for public scrutiny.

- **Clarity on route selection principles or process:** BGE queried whether the route selection principles were applied to all route selections by EirGrid in 2019, and if any lessons were learned as a result.

  EirGrid response: The final route selection process is captured in a Step 4 report, which is made publicly available. It is also communicated by way of ongoing liaison with stakeholders. The general principles of route selection are set out in our document "Have Your Say" which is available at www.eirgridgroup.com.

Demand Response Aggregators of Ireland (DRAI)

DRAI have acknowledged that EirGrid has made considerable efforts to improve engagement with them through 2019 and welcome the regular bilateral forum, acknowledging a number of successful outcomes resulting from this process. They welcome this evolving approach to collaboration and the opportunity to continue working with EirGrid to build and develop our relationship. DRAI also raised specific comments and provided feedback on engagement associated with the FlexTech initiative and the benefits of early in depth engagement, as addressed in our overarching themes. In addition, below EirGrid has set out its response to another point raised.

- **Case study:** DRAI felt that greater emphasis should be placed on engagement with customers and industry and suggest that a case study to illustrate the importance and effectiveness of this engagement would be very beneficial.

  EirGrid response: The case studies have been selected to allow us to demonstrate our stakeholder engagement processes through an in depth look at five distinct examples of engagement from 2019. These have been chosen to encapsulate a broad spectrum of our engagement with our customers, industry and stakeholders. In choosing these case studies we were mindful of feedback from consultation and the NSEE panel last year and have sought to reflect a balanced view of our successes and learnings in stakeholder engagement over 2019. We welcome DRAI's comment and will give due consideration to emphasis on customer and industry engagement in the selection of case studies for future 2020 Stakeholder Engagement Reports.

Energy Storage Ireland (ESI)

Energy Storage Ireland welcomed the progress in 2019 in the area of DS3 Volume Capped auctions, DS3 Volume Uncapped arrangements and were appreciative of EirGrid's willingness to engage and consult with industry during these processes. ESI provided feedback on the FlexTech engagement and timelines and their experience with the connection offer process, also highlighting the need for early engagement. While these are addressed in the overarching themes above, the EirGrid responses to additional points raised are outlined below:

- **Connections:** ESI outlined that a number of developers highlighted issues around connection offer process timelines and communication delays leading to uncertainty and risk to projects that need to meet specific development deadlines to secure DS3 system services contracts. ESI recommended that the EirGrid and ESB Networks connection

teams carry out a lessons-learned review of their processing procedures of storage technologies for ECP-1 so that these inconsistencies are not repeated in future.

EirGrid response: EirGrid appreciates the feedback provided from the ESI relating to the engagement during the connection offer process. Battery storage is a new and innovative technology and the connection process, tied in with the DS3 Volume Capped Procurement, is one of the first of its kind. There have been many aspects of connecting Battery Energy Storage Systems (BESS) that were new to EirGrid and a prudent approach was required in in terms of assessing their impact on the system to maintain system security. This contributed not only to EirGrid's internal considerations but also those with other stakeholders such as the DSO.

We appreciate that the timelines have not always met some of your customers' needs and we are looking at ways to improve. However, please note that the timelines required for the DS3 Volume Capped Procurement process were shorter than our standard lead times. Nevertheless, we worked closely with connecting customers to try to assist them planning to these timelines. We brought these offers to be processed first in the batch and engaged early and often with customers on their connection method. In some cases, these customers were relatively new to the Irish electricity landscape.

We are aware that there were issues for a small number of customers where they had specific requests regarding their connection method that could not be granted e.g. connecting to the transmission system rather than the distribution system. EirGrid is obliged to manage network assets in a secure and efficient manner and to ensure best outcomes for the end consumer. EirGrid works closely with our DSO partner and we regularly meet to discuss all relevant aspects of the connection process.

DS3 Contract Flexibility: ESI have noted that contract flexibility for new-build assets would help reduce development risk and requested feedback on an ESI communication relating to this sent to the DS3 team on 6th April.

EirGrid response: In relation to future arrangements and contract flexibility we expect these matters to be addressed by the Regulatory Authorities (RAs) as part of the consideration of future arrangements (effective post April 2023). We understand that a consultation on future arrangements will be published in 2020 and we would encourage all interested parties to engage in the RAs' consultation process. As TSO, it is also EirGrid's intention to respond to the RAs' consultation when it is published.

- **Network Charging:** ESI outlined a concern that storage must pay both generation and demand charges for the stored energy, noting that this is a significant hurdle for the development on battery storage projects.

  EirGrid response: Charges for use of the Transmission System (TUoS) are subject to direction(s) from the Commission for Regulation of Utilities (CRU). EirGrid as Transmission System Operator (TSO) submits a Statement of Charges, compiled on an annual basis and submitted to the CRU for approval. The approved Statement of Charges is updated annually on the EirGrid website, with the current 19/20 Statement located here.

  As you may be aware on 31 March 2020, the CRU published an open letter, available here, on its website, in response to a letter from the Irish Energy Storage Association. In addition, CRU's 2019-2021 Strategic Plan, available here, also references a tariff review.

Review of tariffs is an activity under the storage working group, under the FlexTech initiative and is currently proposed as a deliverable in the medium term (2021-2024), but this will be reviewed in accordance with the RAs' timelines.

EirGrid plc as TSO will engage with the CRU and the industry regarding both the interim and wider review referenced in CRU's letter and will implement CRU's direction regarding any changes to TUoS charges applicable to storage.

- **Reducing Carbon Footprint**: ESI stated that going forward, they recommend that EirGrid consider the location of DS3 meetings, forums and workshops in terms of accessibility and transport options to try and facilitate participation and reduce carbon emissions from travel.

  EirGrid response: Thank you for bringing this to our attention. In principle we agree with this sentiment and it will be considered on the agenda for discussion at the DS3 Advisory Council to get the all island industry view.

ESB Generation and Trading (ESBGT)

ESB Generation and Trading outlined that their experience of EirGrid's stakeholder engagement through industry and market forums or through formal consultation processes is constructive and allows participants to share views and that these views can be reflected in any resulting decisions. EirGrid welcomes this feedback. In addition to this feedback, ESBGT also raised a number of points. Below, EirGrid has set out our response to the main points raised by ESBGT where not previously addressed in our overarching themes.

- **Progress Reports:** ESBGT stated they would welcome progress reports on EirGrid's projects or proposals to allow for business planning processes and noted as an example the DS3 framework provision for the performance scalar to be tied to the accuracy with which the service provider could forecast their service availability over a six-hour window.

  EirGrid response: We welcome your suggestion on progress reports on projects or proposals. This will be considered for future stakeholder engagement plans and reports subject to CRU approved funding. In relation to the DS3 framework, there is an ongoing consultation on changes to the latest version of the DS3 Protocol. The associated consultation paper outlines some proposals for future changes to the protocol that we intend to consult on for the next revision of the protocol. Specifically, in relation to the implementation of the Availability Discount Factor (PA), the DS3 Protocol includes a requirement to consult with industry on any proposal to introduce PA to the performance scalar and the final design is subject to RA approval. This process is designed to allow for time to implement the relevant changes. The Availability Discount Factor component of the performance scalar is defaulting to 1 for all applicable units for at least the first 24 months following the commencement of the Regulated Arrangements (May 2018).

- **Historical Decision Engagement:** ESBGT commented that engagement on historical decisions is helpful to ensure they remain fit for purpose, referencing the Outturn Availability decision.

EirGrid response: EirGrid is bound by regulatory decisions as set by the relevant Regulatory Authorities and the extent to which they remain fit for purpose is a matter for the Regulatory Authorities.

- **Transparency of Constraint Rules:** ESBGT commented that they would welcome a range of scenarios being developed and published around the existing constraint rules to assist generators and other potential market entrants to understand the possible constraints that could impact around particular nodes.

  EirGrid response: This feedback has been passed to the relevant team within the organisation for their consideration.

- **Non Contestable Grid Connection:** ESBGT noted that there is significant value in the shift to the use of key engagement managers that facilitate early and informed engagement with investors in technical projects. They also noted that it would be useful if lead times on non-contestable elements of grid connections could be shortened.

  EirGrid response: EirGrid appoints a dedicated project manager to each transmission capital project (contestable and non-contestable projects) who work closely with nominated customer representatives. These teams are available for early engagement with investors in technical projects. The delivery of the non-contestable elements of grid connections is a key focus for EirGrid as we move into the PR5 and PR6 periods. We are working closely with our partners in ESB Networks to review our infrastructure delivery processes and to implement measures to ensure that we are in a position to meet our 2030 targets.

Irish Wind Energy Association (IWEA)

IWEA welcomes the many positive steps and initiatives that EirGrid undertook in its stakeholder engagement activities in 2019 and notes positive feedback from members on early engagement via customer clinics, experience with a number of team across connections, customer relations and generator testing, consultation on TES and communication improvements associated with the Moneypoint outage. IWEA also notes a number of opportunities for improvement in the areas of design specifications, grid development and delivery, the website, availability of up to date information, dispatch down, connecting renewables and measuring success. Below, EirGrid has set out our response to the main points raised by IWEA where not previously addressed in our overarching themes.

- **Dispatch Down:** IWEA has provided feedback on improvements that can be made to EirGrid's dispatch down reports and have requested a meeting with EirGrid to discuss this feedback.

  EirGrid response: EirGrid welcome the above feedback on this technically challenging and complex area. EirGrid have worked across 2019 to improve our engagement around constraints and curtailment via fora such as the Constraints and Curtailment workshop in September 2019 and discussions with IWEA and customers. We have also committed to quarterly dispatch down meetings between EirGrid and representatives from the IWEA Dispatch Down working group to continue collaboration to improve engagement in this area.

- **Up to date information**: IWEA notes that some of EirGrid's annual publications could be improved as they often contain out of date information due to old data freeze dates. IWEA also highlighted that the wide variety of documents can make obtaining the relevant information difficult and suggests a review of all publications to see where more up to date information can be provided and possibly refining the number of publications would be of benefit.

  EirGrid response: Transmission network development is continuously evolving. To help the comparison of network development projects year-on-year, and in the interest of routine reporting and conducting network studies, data is represented at a fixed point in time – the data freeze date. Changes that occur after the data freeze date are captured in the next iteration of the relevant documents.

  EirGrid plans to improve the availability of up to date information through the Customer Journey initiative under PR5, which will provide up to date information available online, subject to the approval of appropriate funding. In the next business year we intend to review Eirgrid's annual publications to ensure that they are providing relevant information.

- **Industry consultation feedback:** IWEA notes that they would welcome the sharing of industry consultation feedback across other areas of EirGrid, for example the information provided in the TES consultation should be shared and incorporated into other EirGrid publications such as for example more forward-looking constraint and curtailment reports.

  EirGrid response: EirGrid notes this feedback. Alongside the changes to our organisational structure to optimise delivery of our strategic goals, we are piloting enhancements to our customer and industry engagements developed based on best practise and feedback, including improvements in cross-functional sharing of consultation responses where appropriate.

- **Grid Design Specifications:** IWEA requests that design changes to grid specifications should be flagged early on and consulted on as changes can have a material impact on renewable projects.

  EirGrid response: EirGrid is statutorily obliged to determine the transmission standards/grid specifications which apply to the development of the transmission system. CRU is of the view that the consultation process should not apply to such transmission standards/grid specifications. EirGrid recognises that a greater level of transparency is desired regarding the development of standards and publication of confirmed standards in certain cases. EirGrid have committed to providing notification of upcoming potential design specification changes going forward. All grid design specifications are now published on the EirGrid website.

- **Grid delivery:** IWEA commented that there seems to be some misalignment between ESB and EirGrid in terms of progressing grid delivery works.

  EirGrid response: EirGrid notes the opinion of IWEA and believes it would be worthwhile to engage further directly to understand the perceived misalignment.

- **Grid Development Engagement:** IWEA proposes the establishment of a Grid Capacity Advisory Council.

EirGrid response: Consideration is being given to the most effective ways of engaging with key stakeholders to achieve our 2030 targets. EirGrid would like to engage further with IWEA to better understand their proposal.

UCD Energy Institute (UCDEI)

UCD Energy Institute commented in its response that the Stakeholder Engagement Report 2019 provides a useful overview of many of the external engagement activities in which EirGrid participates. They noted that the case studies provide a useful overview of the types of engagement, the level of interaction and the benefits and learnings from the engagement. UCDEI also highlighted opportunities for improvements around online resources, the NAC and engagement activities. Where these have not been addressed in the overarching themes above, EirGrid outlines its response below:

- **EirGrid Contribution in other activities:** UCDEI outlined that it would be useful to reference other engagement activities such as industry events and academic workshops where EirGrid personnel are invited to share their expertise. UCDEI notes that this is of vital importance to ensure research is guided by real world expertise and to ensure open communication between academia and industry.

  EirGrid response: EirGrid welcome this feedback and will endeavour to reflect these valuable engagement activities more fully in future publications. EirGrid Group actively supports research projects and collaborates and partners with academia and research experts, both on the island of Ireland and internationally. The approach of EirGrid Group to engagement with academia includes supporting and steering research at third level institutions and engaging with research experts, supporting and partnering with indigenous projects and seeking opportunities to participate and lead international consortium based projects. EirGrid Group regularly hosts masters students and PhD students (most recently students from UCD and DIT) and routinely provides letters of support to academics applying for funding. Additionally, EirGrid Group provides information and data upon request to PhD students and researchers. EirGrid Group also contributes to large research projects (such as MIGRATE, PROMOTION) and has representation on Advisory Committees for academia-led consortium projects and research groups (such as CREDENCE, MaREI, ESRI Energy Policy Research Centre). EirGrid also leads the EU-SysFlex Project, which has a large consortium of academic and industry partners.

Western Development Commission (WDC)

The Western Development Commission noted there is a good culture of engagement and that they found EirGrid staff responsive to meeting with them to discuss any issues raised. In addition, WDC outlined feedback for EirGrid, to which EirGrid has set out its response where not addressed in the overarching themes:

- **Stakeholder Engagement:** WDC commented that it would be useful to include some outlines or diagrams outlining how EirGrid responds to queries and consultation responses.

EirGrid response: EirGrid has outlined for stakeholders, including members of the public, how to provide input and how this input is used for Grid Development projects in the "Have Your Say" document which is available at www.eirgridgroup.com under Have Your Say. A similar document for customers and industry will be published in 2020, our Stakeholder Engagement Framework, which will outline how we respond to queries and consultation responses.