Annual Electricity Transmission Performance Report 2024 and Investment Planning & Delivery Report 2024

Summary of Responses to Consultation

30th September 2025

1. Introduction

This paper summarises the feedback received by EirGrid and ESB Networks, in their respective capacity as Transmission System Operator (TSO) and Transmission Asset Owner (TAO), to the public consultation on the Draft 2024 Annual Electricity Transmission Performance Report (APR) and Draft 2024 Investment Planning and Delivery Report (IPD) which ran from 20 August 2025 to 17 September 2025. Each year, these reports provide customers, industry participants and other interested parties with a clear, accessible, comprehensive, quantified but non-technical account of performance in the preceding year.

The consultation sought the views of customers and stakeholders on the draft reports in advance of their finalisation. The TSO and TAO believe that consultation and engagement are core and essential business activities. They provide stakeholders with the opportunity to participate in a meaningful way and help the TSO and TAO understand and where possible incorporate or address stakeholders' comments.

2. Background

The Commission for Regulation of Utilities (CRU) decision paper PR5 Regulatory Framework, Incentives and Reporting (CRU/20/154) sets out the requirement for the TSO and TAO to publish the APR and IPD on an annual basis for the PR5 period, 2021 to 2025.

The TSO and TAO are required to jointly prepare and publish a summary annual performance report, the APR, documenting how their activities and behaviours over the previous calendar year have delivered outputs relevant to the needs of customers, market participants and other stakeholders.

The TSO and TAO are required to jointly prepare an annual investment planning and delivery report, the IPD, a high-level summary report designed to provide an overview of the transmission development programme in the previous calendar year and how the six-step process for grid development worked by reference to projects in that period. The IPD report is intended to be a companion document to the APR. In developing the 2024 reports, the TSO and TAO were cognisant of this requirement and the criteria set out in Annexes 2 and 3 of CRU/20/154.

3. Related Documents

Documents published as part of this consultation:

- Draft 2024 Annual Electricity Transmission Performance Report | Dréacht-Tuarascáil Bhliantúil ar Tharchur Leictreachais 2024
- Draft 2024 Investment Planning and Delivery Report | Dréacht-Tuarascáil faoi Phleanáil agus Seachadadh Infheistíochta 2024

Final reports for 2023:

- 2023 Annual Electricity Transmission Performance Report
- 2023 Investment Planning and Delivery Report

Relevant CRU decision paper:

- CRU/20/154 -PR5 Regulatory Framework, Incentives and Reporting

4. Responses to the consultation

The TSO and TAO received two submissions in response to the consultation, from Art Data Centres and Energia. We would like to thank Art Data Centres and Energia for their response.

Having reviewed the consultation responses received in detail, the TSO and TAO do not propose to make changes to the current draft of the APR and IPD for 2024.

The following consultation question was asked:

- With respect to the draft reports, are there areas within the reports that you feel require more detailed information?

A number of the items raised are outside of the scope of this consultation and as a result are not responded to in this document, as noted at the time of the consultation. The APR and IPD provide a lookback on the TSO and TAO's performance in the prior calendar year within the context of the extant regulatory framework and arrangements pertaining to PR5. The intention of the reports is not to provide a detailed account of all actions taken or a detailed plan of how the various objectives of the TSO and TAO will be met in the future. The normal consultative processes held by the CRU/EirGrid/ESB Networks on specific topics is the more appropriate mechanism for such engagement/expression of views by interested parties and we would encourage interested parties to continue to engage in those consultations.

We set out below our responses to those comments received which are within the scope of the consultation.

5. Comments Received

Art Data Centres Submission:

"Transmission Loss Adjustment Factors (TLAFs) published in the report are backward-looking settlement factors, which allocate the cost of losses by region. They reflect past flows rather than forward planning benefits. Thus, generation-rich regions like Clare, which export large volumes, are assigned lower TLAFs (<1.0), while import-heavy regions like Dublin show higher TLAFs (>1.0). On page 75, Clare's TLAF is 0.973 compared with Dublin at 1.008. While this appears to disadvantage Clare, the forward-looking implication is the reverse: locating demand in Clare reduces the impact on the transmission system and reduces losses, thereby improving the system over time."

"The current presentation of TLAFs risks misinterpretation. We respectfully submit that the report should explicitly acknowledge the benefit of locating demand close to generation. The Art Data Centres project in Ennis demonstrates this principle in practice: it is consistent with planning approval, strategically beneficial to the transmission system, and supportive of national policy objectives."

Response:

As aforementioned, the APR and IPD both provide a lookback on the TSO's and TAO's performance in the prior calendar year within the context of the extant regulatory framework and arrangements pertaining to PR5. In developing the 2024 reports, the TSO and TAO were cognisant of the requirements and the criteria set out in Annexes 2 and 3 of CRU/20/154.

The purpose of TLAFs is to allocate transmission losses to market participants fairly and equitably, in a manner which is reflective of their contribution to transmission losses. TLAFs are site-specific. The principle is that market participants who contribute more to transmission losses due to their location should have a lower TLAF than those market participants who contribute less to transmission losses, resulting in higher TLAFs. TLAFs are calculated on the basis of an approved methodology (SEM-12-049) and utilise a forecast annual dispatch reflecting the latest assumptions for the upcoming year. For more information on approved TLAFs and how they are allocated to market participants, please visit EirGrid's website here.

Consistent with the requirements set out in Annex 2 of CRU/20/154, the APR has for the last number of years included a map based figure illustrating regional TLAFs % change comparing regional TLAFs from the year being reported on with those of the prior year. The TLAF detail included in the APR is high-level only and is not intended to be used as a basis for stakeholder strategic decision making.

Energia Submission:

"In the annual performance report EirGrid provide detail of only one action being taken to address renewable dispatch down - to trial and implement a reduction in the minimum number of conventional units required to run from five to four."

"Where targets are being missed, as with imperfections, the performance report should provide far more detail on the underlying drivers behind the poor performance, the measures that have being taken in an attempt to address them as far as possible, and why these have not been effective. This includes actions across the interconnectors, including details of how the SOs have attempted to use SO-SO trades to reduce levels of dispatch down."

Response:

As aforementioned, the APR is not intended to be a detailed report on all transmission performance-related matters. The APR provides a lookback on the TSO and TAO's performance

in the prior calendar year within the context of the extant regulatory framework and arrangements pertaining to PR5. The intention of the APR is not to provide a detailed account of all actions taken in the calendar year being reported on or a detailed plan of how the various objectives of the TSO and TAO will be met in the future.

It is important to note the distinction between the PR5 Imperfections and Constraints Incentive and the PR5 Renewable Dispatch Down (RDD) Incentive and how they are assessed by the CRU. The PR5 Imperfections and Constraints Incentive is a Balanced Scorecard based incentive. The CRU's Annual Balanced Scorecard based assessment includes the use of a 20/40/40 weighting approach as follows –

- Quality of the plan and defined actions (20%);
- Quality of implementation of the plan (40%);
- Effectiveness of the plan and demonstrable impacts (40%),

as outlined in Section 11 of the Draft 2024 APR and in Section 3.2 of the CRU202405 PR5 2024 Balanced Scorecards Information Paper. The PR5 RDD Incentive is a numeric target-based incentive. Hence, both incentives are assessed differently by the CRU and the manner in which they are reported on in the APR is also different in terms of the level of detail provided.

Consistent with the requirements set out in Annex 2 of CRU/20/154, the APR has since the beginning of PR5 included details of the actual balanced scorecards applicable to each of the balanced scorecard based incentives together with details of the aggregate outturn score for each incentive per the CRU's assessment. In parallel, very high-level information only is provided regarding the PR5 numeric incentives, with the CRU's assessment being solely numeric i.e. was the target met or not.

Per Section 7.4 of CRU/20/154, EirGrid's proposed RDD targets for PR5 were 8%, 9% and 10% for 2021, 2022 and 2023-2025 respectively. EirGrid considered this to be a realistic trajectory. The CRU decided to set more ambitious thresholds that were beyond EirGrid's original proposal at the start of PR5.

Section 7.3 of the APR states: "It is expected that as the energy share of renewables increases, so too will the percentage of renewable generation dispatched down." RDD is heavily influenced by many factors outside of the TSO's control, including weather conditions, demand growth, level of renewable generation connected to the system and market-driven interconnector imports.

With regard to actions across the interconnectors, it is notable that although EirGrid as TSO could seek to counter trade interconnector import flows to minimise the dispatch down of priority generation, other markets are not under any obligation to accept trades counter to pricing for any reason other than system security issues.

Energia Submission:

"Energia believes that stakeholders would derive significantly greater value from enhanced transparency around the delivery of planned transmission asset projects in 2024. Simply reporting the number of projects expected versus those completed does not provide sufficient insight into how effectively EirGrid and ESB Networks have performed. The annual performance report should clearly set out how each project delivered within the year compared against its original baseline programme (PR5)."

"As currently drafted, the annual performance report does not allow readers to assess whether the projects completed are those originally scheduled for delivery. Including this information would give EirGrid and ESB Networks the opportunity to demonstrate where they have outperformed, or underperformed, relative to their initial timelines, while also enabling stakeholders to understand the reasons behind any variations. This level of transparency would ensure stakeholders can verify whether reported outcomes align with expectations. In case such information is already published, it will be highly beneficial if the report provides direct links to the relevant sources for ease of access."

Response:

EirGrid is required to publish quarterly updates on the progress of all its transmission infrastructure projects in the Network Delivery Portfolio (NDP), as set out in CRU/20/154.

The NDP publication provides a quarterly status update on the three major project milestones - EirGrid Capital Approval, Project Agreement with ESB, and Energisation, along with a status indicator regarding timelines relative to the original PR5 Baseline dates for each project milestone[1].

The objective of the NDP is to deliver on the TSO and TAO strategies to transform the power system by 2030 in accordance with Government 2030 targets and Climate Action Plans. We do this by providing a clear and transparent programme over multiple years which maximises the amount of project related work that can take place to reinforce the system, connect customers and deliver the required level of maintenance of the transmission system while ensuring a safe and secure system.

The Q4 2024 NDP report is linked in Section 18.1, Footnote 62 of the Draft 2024 APR. Additional information on transmission infrastructure projects that need to be built or upgraded over the ten years to 2033 can be found in the 2024 Transmission Development Plan[2].

6. Next Steps

EirGrid and ESB Networks have considered the consultation responses received and no additional changes are proposed to be made to the draft 2024 APR or IPD since published for consultation as a result of consultation responses received. The final versions of the 2024 APR and IPD have been provided to CRU for approval together with this consultation response document.

[1] Quarterly NDP reports and guidance documentation can be found on the EirGrid website: Network Delivery Portfolio (NDP) | Grid Information | EirGrid

[2] Transmission Development Plan 2024