

EirGrid Stakeholder Engagement Plan 2020

Consultation Response Paper V2.0

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Introduction

This paper (the 'Consultation Response') is the last step in developing our final Stakeholder Engagement Plan for 2020. This document responds to feedback received to our draft plan. The public [consultation for this draft plan](#) ran from 19th February 2020 to 2nd 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.

Our Stakeholder Engagement is a process of continuous improvements. This consultation on our draft 2020 Stakeholder Engagement Plan provided valuable feedback to allow us to continue and tailor this improvement. 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 for 2020. All submissions received were examined by the Customer and Stakeholders team. They were also shared with the wider organisation, where relevant, to develop meaningful responses. Following this review of the feedback, and of the comments received from our stakeholders, we developed this document. We have also published the final [Stakeholder Engagement Plan](#) on our website.

This Consultation Report

We received a total of 8 responses from the following organisations:

- Bord Gáis Energy (BGE)
- Demand Response Aggregators of Ireland (DRAI)
- Electricity Association of Ireland (EAI)
- Electric Ireland (EI)
- Energy Storage Ireland (ESI)
- ESB Generation and Trading (ESBGT)
- Irish Wind Energy Association (IWEA)
- UCD Energy Institute (UCDEI)

Thank you to all those who responded to this consultation. A number of points in the responses related to the Stakeholder Engagement Plan which is the subject of this consultation. Where possible, we have updated the Stakeholder Engagement Plan 2020 with your feedback. In addition, relevant feedback that was not incorporated in our 2020 Plan will also be considered for our 2021 Plan. This will be published for consultation in Q4 2020. Finally, some comments related to matters of individual policy and, as a result, are not specifically within scope. Nonetheless, we have taken the opportunity to take account of a number of these in the spirit of open engagement.

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 2020 Stakeholder Engagement Plan.

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 2020 Stakeholder Engagement Plan 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.

Overarching Themes of Responses Received

Overall, respondents welcomed this consultation on EirGrid's Stakeholder Engagement Plan for 2020. The improvements to our stakeholder engagement that we have implemented were acknowledged by respondents, who also welcomed the additional clarity that our Stakeholder Engagement Plans have 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 [2020 Stakeholder Engagement Plan](#), which was published on our website on 29th May 2020, to include feedback that we received from our stakeholders around transparency and the timing of our engagement. We have also included further detail on our planned improvements in the plan, such as more objective assessment of successful engagement. We have also included our list of 2020 engagements within the Appendix of the final plan, for the avoidance of any doubt.

1. Requests to Further Improve our Engagement

Overall, respondents have welcomed the improvements that EirGrid has made in stakeholder engagement. Respondents recognised the quality of our approach when engaging with stakeholders. Some respondents noted that earlier engagement on our Stakeholder Engagement Plan for the year ahead would be welcome – and that a minimum consultation period of 6 weeks for all consultations would be preferable. Another felt that when complex policies and rules are being developed, early engagement and consultation on a wider range of options would be beneficial. There was also a request for greater transparency around decision making. This could include an assessment of all views considered by the TSOs when making decisions that impact the wider sector.

EirGrid response:

We agree with this feedback, as our experience and insights have shown that early and proactive engagement has delivered better results. We welcome participation of all customers and industry stakeholders in future work. We will continue to engage through the regular meetings, advisory processes such as the DS3 Advisory Council and initiatives such as FlexTech. Our Stakeholder Engagement Plan for 2020 sets out the range of formal engagement opportunities for stakeholders. We will also provide updates on additional opportunities to stakeholders as they arise. We are currently considering the most effective ways of engaging with key stakeholders to help us achieve our 2030 targets.

Where EirGrid undertakes a consultation, we continue to work to bring a consistent approach to timely publication of final decision papers and consultation responses. These publications set out our response following assessment of all the consultations responses received. Going forward, we will endeavour to consult for a minimum of 6 weeks wherever possible. If a consultation period is extended in the event of exceptional circumstances, any reference to the consultation on our website will be updated to reflect the new closing date. We will also issue a communication from the info@eirgrid.com mailbox. To continue to enhance our Stakeholder Engagement, in future we will be consulting on our Stakeholder Engagement Plan for each year at the end of the previous year. As outlined in our list of planned consultations for 2020, we will consult on the 2021 Stakeholder Engagement Plan in Q4 2020.

Later in 2020, as set out in our final Stakeholder Engagement Plan 2020, we will publish our Industry Stakeholder Engagement Framework. This framework will set out how we engage with customers and industry stakeholders to enhance understanding of our processes. This will build 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.

2. Requests for greater consultation to enhance our engagement plans

While welcoming the opportunity to provide feedback on the plan, some respondents outlined that they would have liked a greater opportunity to widen the scope of this plan. Suggested additions included further information on our engagement with customers and industry stakeholders. This could cover day-to-day activities and an overview of the key projects and programmes, including capital projects. Information on projects could include outline stakeholder engagement plans to better inform potential stakeholders. This would give them an opportunity to input to the engagement plan and to assess the effectiveness of the stakeholder plan.

EirGrid response:

EirGrid engages directly with our customers and a broad community of stakeholders across both our day to day activities and in our projects and initiatives. We are involved in extensive one-to-one engagements with CRU, the Department, Government Bodies, DSO & TAO and various Industry representative bodies. EirGrid participates in Industry Hosted Fora, Working Groups

and Conferences. Our Stakeholder Engagement Plan aims to provide an overview of these engagements and their purpose. Please refer to the Appendices of our Stakeholder Engagement Plan for a detailed overview of our planned engagements over 2020. In addition to this, as noted above, in 2020 we will publish our Stakeholder Engagement Framework, setting out the key areas of engagement across the organisation and how decision-making occurs. This will demonstrate how feedback is incorporated and shared to ensure better outcomes for all.

In 2020, we are reviewing our stakeholder mapping. This review takes place regularly and includes all appropriate stakeholders to ensure effective engagement is achieved across all our work. We recognise the importance of all sectors of the electricity industry and the need to have appropriate engagement across each sector.

Bespoke stakeholder engagement plans are prepared for every grid development project and each key initiative. These plans are tailored to specific needs and to ensure specific objectives are met. In 2019 we published our engagement plan for our Tomorrow's Energy Scenarios (TES) 2019 initiative. Following feedback, we committed that for future iterations of TES we would engage key stakeholders on our draft engagement plan before proceeding. We are working on applying this learning consistently on key initiatives across the organisation.

3. Requests for Measures to Define and Assess Effectiveness of Engagement

Some respondents asked that EirGrid provide information on how we assess the effectiveness of our engagement. One respondent noted that providing facilities for feedback and response from participants in each engagement process would be beneficial. Another suggestion was the inclusion of metrics and KPIs for specific areas of engagement – such as before and during the connection offer process. Other feedback included the suggestion of a regular customer survey and the expansion of the stakeholder community.

EirGrid response: While the improvements we have made to stakeholder engagement to date 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. These could include regular and ad hoc engagements with customers as well as more formal fora such as the Grid Code Review Panel. We also plan to conduct a customer survey on our engagement in 2020, as included in our final Stakeholder Engagement Plan.

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 under the PR5 framework on the engagement initiatives that we are planning for the next 5 years. This includes an appropriate performance evaluation mechanism for stakeholder engagement. We encourage all stakeholders to participate in the consultation on these plans when this takes place.

4. Requests for Improvements to Online Resources and Notifications

Several respondents commented on the challenges of accessing information on EirGrid's website, such as consultations, documents in the library and the Stakeholder Engagement site. A suggestion for a central calendar 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.

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 implementing changes to our process for publications, including providing email notification when certain topics are updated on our website. We have also created a new [Stakeholder Engagement webpage](#). This includes a comprehensive plan of our specific engagements for 2020, including the topic of engagement, key stakeholders, timing and the objective of the engagement. In addition to all publications, consultations and various fora such as planned workshops and webinars we now list on our website, we have made other improvements to the EirGrid website. This includes a direct link to the Stakeholder Engagement page in the highlighted topics showcased on the home page of our website. We have also created 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.

We will be starting a process of analysis and review to further upgrade our website later in 2020. 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 the necessary funding under the PR5 process.

As part of our planned upgrades to the website, the search functionality is a matter of 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.

Specific Consultee Comments

As outlined above, EirGrid received a total of eight consultation responses on its Stakeholder Engagement Plan 2020.

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 commented that they support proactive and strategic stakeholder engagement by EirGrid. They are pleased to see the strategy outlined in the plan is current – with a focus on the updated national target of 70% renewably-generated electricity on the grid by 2030. BGE also welcome the open and honest engagement they generally experience with EirGrid.

Here is 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 2020

- **Transmission Loss Adjustment Factors (TLAF) Methodology:** BGE requested that EirGrid investigate modification of the existing TLAF methodology.

EirGrid response: Any change to the TLAF methodology would be subject to direction(s) from the SEM Committee. The Commission for Regulation of Utilities in Ireland and the Utility Regulator in Northern Ireland have both noted their intention to complete a tariff review. EirGrid and SONI (the TSOs) will engage with the Regulatory Authorities and the industry regarding any tariff review and will implement the SEM Committee's direction regarding any changes to TLAF methodology.

- **Celtic Interconnector:** BGE submitted a request for establishment of a Celtic advisory group.

EirGrid response: EirGrid's consultation process occurs in the context of its 6-step Framework for Grid Development, whereby public consultation is an intrinsic part of a project development strategy. The Framework for Grid Development includes as a key tool the preparation of a Consultation and Engagement Strategy for a project. In this framework, we identify the needs of stakeholders, and formulate a strategic approach to consultation and engagement. This integrates with the project development process and ensures value for all parties.

We capture feedback from consultations and explain how this informs our ongoing project decision-making process in our Consultation Reports and other related documents. All of these are made available for public scrutiny. EirGrid has outlined for all 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. This is available on the EirGrid website [here](#).

- **Project Consultations and Engagements:** BGE have requested an explanation of why only 8 projects are listed for stakeholder engagement and consultation in 2020

EirGrid response: The 8 specific projects listed are those where we expect significant stakeholder engagement this year as they progress through the six-step process. We have since identified an additional project and have included this in the Appendices of the final 2020 Plan. Our Stakeholder Engagement page will be updated, and stakeholders will be notified of any additional projects or opportunities as they arise.

Demand Response Aggregators of Ireland (DRAI)

DRAI welcomed and supported the proposed collaborative approach to customer engagement detailed in our Stakeholder Engagement Plan 2020. They indicated that they look forward to continuing to work with EirGrid to build stronger relationships.

- **Enhanced emphasis on system service providers:** DRAI would like to see more emphasis on engagement with customers who provide critical system services but may not be directly connected to the transmission system. In particular, they wanted to see greater recognition for customers connected to the distribution system. DRAI also expressed the view that there should be deeper engagement with the demand industry and further development and integration of demand services.

EirGrid response: Our Stakeholder Engagement Plan 2020 encompasses engagement with all our stakeholders, not only directly connected customers. Providers of the necessary services for operating the system with high penetration of renewables are key enablers to meeting 70% of Ireland’s electricity needs from renewables by 2030. We fully recognise the importance of appropriate and effective engagement with all sectors of the electricity industry and the need for continuous improvement. We will continue to engage with DRAI and the demand response industry. This will be achieved through regular quarterly meetings, specific working groups where appropriate and through advisory processes such as the DS3 Advisory Council. We will also engage more widely through initiatives such as FlexTech. We will continue to work with DRAI to ensure engagement as early as possible. Our shared experience with stakeholders such as DRAI is that proactive and early engagement delivers better results. In addition, the Stakeholder Engagement Plan sets out a range of formal engagement opportunities coming up over 2020. We will also provide updates on any additional opportunities to stakeholders as they arise.

Electricity Association of Ireland (EAI)

EAI advised that they recognise the quality of the formal consultation processes undertaken by EirGrid and the importance of our commitment to timely engagement with stakeholders. EAI commended the strongly collaborative approach with industry and the level of public facing fora and engagement that has been evident across the DS3 space. They suggested this approach will need to continue and grow in both scope and frequency.

- **Benchmarking exercise:** EAI suggested that EirGrid undertake a benchmarking exercise to support the work of the Network Stakeholder Engagement Panel. This could establish the extent to which the current level of stakeholder engagement by the TSO is aligned with other industries or markets.

EirGrid response: We benchmarked our stakeholder engagement against other TSOs and relevant organisations in 2019. This yielded significant insights which were used to develop the EirGrid Group Strategy 2020-25 and to develop our proposed PR5 initiatives for enhancing our stakeholder engagement. There is also continuous knowledge sharing through the Renewable Grids Initiative (RGI) and other similar fora. We recognise the benefits of benchmarking. Our next step is to consider how the impact of our engagement might be benchmarked consistently across other relevant organisations or industries.

ESB Generation and Trading (ESBGT)

ESB GT advised in its response that EirGrid’s stakeholder engagement through industry and market fora and through formal consultation processes is constructive. They confirmed that our engagement processes provide an opportunity for all stakeholders to share views which are reflected in resulting decisions.

- **Recommendation Papers:** ESBGT requested that EirGrid consider publishing all recommendation papers presented to the Regulatory Authorities in advance of their decision-making.

EirGrid Response: Where EirGrid undertakes a consultation, we continue to work to bring a consistent approach to timely publication of consultation reports and final

decision papers. However, we do not consider it appropriate to publish the recommendation papers that we present to the Regulatory Authorities in advance of their decisions.

Electric Ireland (EI)

Electric Ireland commented in its response that the 2020 Stakeholder Engagement Plan provides a useful overview of the aims of the Stakeholder Engagement Process and how it functions.

- **Channels of engagement:** EI suggested that different channels of engagement, including traditional, social media and web based, should be fully utilised. They also suggested that methods of engagement should be tailored to different customer segments, as not all channels of communications are accessible to all stakeholders.

EirGrid response: EirGrid uses a wide variety of platforms to promote our stakeholder consultations. These include email notifications, website updates, traditional media advertising and social media postings. We use different channels for different types of consultations, depending on the type of audience we want to reach. We regularly carry out internal reviews of our engagement activation to ensure our chosen channels are appropriate to the relevant stakeholders we are engaging with. We also use these reviews to assess whether new or existing communication channels can be used for a wider range of engagements.

Energy Storage Ireland (ESI)

ESI thanked EirGrid for the opportunity to provide feedback on the plan. ESI advised that they look forward to engaging with EirGrid at a working group level on the FlexTech initiative.

- **DS3 Meeting/Workshop:** ESI requested a meeting with the DS3 team and a workshop to further investigate battery storage

EirGrid response: There has been on-going engagement and several meetings since receipt of this response.

Irish Wind Energy Association (IWEA)

IWEA welcomes the many positive steps and initiatives that EirGrid undertook in its stakeholder engagement activities in 2020 and notes positive feedback from members on early engagement. IWEA also welcomed the many positive steps and initiatives that EirGrid is currently undertaking regarding its stakeholder engagement activities. IWEA 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 plan for 2020 or in the overarching themes above.

- **Metrics for Quarterly Meetings:** IWEA believe suitable stakeholder KPIs to determine the success of these meetings could include the following up and progression of actions arising from these meetings from both organisations.

EirGrid response: We track all actions and endeavour to close out each action from our meetings in a timely manner. All actions are reviewed at the next meeting. Under our PR5 initiatives, we have planned for the rollout of a single Customer Relationship Management tool across the organisation, subject to CRU approved funding. This will enhance tracking and reporting functionality. As set out above, we intend in future to implement objective assessments of engagement effectiveness that are useful and

meaningful to both EirGrid and Stakeholders. In our final Stakeholder Engagement Plan for 2020, we have also included a customer engagement survey.

- **Connecting Customers:** IWEA noted the importance of early and consistent engagement with developers during the connection process. They also suggested that decisions around the Enduring Connection Policy and other technical requirements imposed on windfarms should be considering by EirGrid in our engagement plans. IWEA also suggested the inclusion of metrics and KPIs for engagement before and during the connection process.

EirGrid response: We fully agree and recognise the value of early engagement for connecting customers, and the increased needs as a result of policy decisions and other requirements. We implemented changes in 2019 such as the introduction of customer clinics. We are continuing to focus on enhancing our engagement both before and during connection offer process. This is set out in our Customer Journey initiative under PR5, subject to CRU approved funding. We will engage with the CRU during the PR5 process on agreeing an appropriate performance evaluation mechanism for stakeholder engagement.

- **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.

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

EirGrid response: A regular quarterly meeting has commenced with IWEA to discuss dispatch down related topics. The proposed improvements to EirGrid's dispatch down reports were discussed at the first meeting.

- **Grid Design Specifications:** IWEA requested that the recent engagement on design changes to grid specifications become the standard adopted for changes to future grid design specifications. They also welcomed notifications of any further potential design specification changes and asked for the opportunity for industry to input to this process.

EirGrid response: EirGrid is statutorily obliged to determine the transmission standards/grid specifications which apply to the development of the transmission system. While EirGrid recognises that a greater level of transparency and industry engagement is desired regarding the development of standards and publication of confirmed standards in certain cases, it would not be feasible for EirGrid to consult with industry on the many standards that are to be employed in the development of the transmission system. CRU has in recent engagements reflected this view. In this context the CRU has advised it considers that EirGrid's process for the development and publication of new technical standards (or the revision of existing standards) should involve industry engagement where there may be a significant resulting impact on project cost or planning. As customers will be aware EirGrid has gathered feedback from industry most recently on Offshore functional specs and 110 kV Cable specs.

Building on the learnings from these and previous such engagements, EirGrid will be reviewing its standard development process with respect to how engagement with industry and feedback should be incorporated in the development of new, or the revision of existing, technical standards which may have a significant impact on customer project costs or planning. In this context, in January 2020, EirGrid launched a new page [here](#) on the EirGrid website containing commonly used transmission policies, functional specifications and drawings of interest to customers. Going forward, EirGrid will re-circulate the link to this section to customers as a mechanism for informing customers when new EirGrid policies, functional specifications and drawings are published.

- **Industry consultation feedback:** IWEA notes that they would welcome the sharing of industry consultation feedback that occurs throughout all functions of our organisation. For example, IWEA suggested that information provided in the TES consultation should be shared and incorporated into other EirGrid publications.

EirGrid response: EirGrid acknowledges and agrees with 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 based on best practise and feedback. This will include improvements to cross-functional sharing of consultation responses, where appropriate.

- **Generator Connections Liaison Group meetings:** IWEA note that the Generator Connections Liaison Group has not met since mid-2019. They consider that this forum is a good mechanism to allow industry, System Operator and CRU engagement and cooperation in delivering connections. They stressed the ongoing need for this group to continue to meet.

EirGrid response: EirGrid note this feedback and have socialised this point with CRU who constitute and chair this group.

UCD Energy Institute (UCDEI)

UCD Energy Institute commended the work EirGrid have done on the approach to engagement with landowners and communities in relation to infrastructure development. They commented on the increase in information the approach has provided to local communities. They commented that this approach has increased transparency in the network planning process.

- **Frequency of innovation fora:** UCDEI note the Flex Tech Second Industry Forum due to take place in Q4 2020 would be of interest to the research community and requested that consideration should be given to increasing the frequency of this – or other innovation events.

EirGrid response: We welcome this feedback and have shared it with the relevant area in the organisation. For FlexTech, we shall hold an annual consultation and engage with the DS3 Advisory on a quarterly basis. From time to time, and as the need arises we shall seek nominations through the DS3 Advisory Council and forums. This will allow us to work with our experts at a working group level on specific topics or issues that benefit from external input.

Further details on the structure and engagement for FlexTech will be provided in our response to the FlexTech consultation that will be published in the coming weeks. 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.

- **Consultations and Customer Conference:** There is no reference to EirGrid group conference and would be good to have sight of consultations throughout the year etc.
EirGrid response: There will be no EirGrid Conference taking place in 2020. The next EirGrid Conference will be in 2021. A plan of our specific engagements for 2020 outlining the topic of engagement such as publication or consultation etc, key stakeholders, timing and the objective of the engagement, is now available on our website via our dedicated Stakeholder Engagement [page](#).