



NETWORKS



ESB Networks' Response to Stakeholder Feedback received on our Engagement Performance in 2023

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Introduction

This response paper is intended to be read in conjunction with [‘ESB Networks Stakeholder Engagement Report 2023’](#) which ran for public consultation from 20th March 2024 until 19th April 2024.

Here we describe key stakeholder feedback and recommendations received on ESB Networks stakeholder engagement performance in 2023 and our response to this feedback.

In January 2024, we also published for consultation ‘ESB Networks Stakeholder Engagement Strategy & Plan 2024’. For completeness, we have included an Appendix to this this response paper which captures relevant stakeholder feedback and recommendations from that consultation process. Comments are related to our ongoing engagement performance and recommendations for continued improvement going forward.

In total, there was one respondent to this consultation on ‘ESB Networks Stakeholder Engagement Report 2023’ and two respondents to our previous consultation on our Stakeholder Engagement Strategy & Plan for 2024.

LIST OF RESPONDENTS	REPORT ON STAKEHOLDER ENGAGEMENT IN 2023 Consultation timeline: 20/3/24 to 19/4/24	STAKEHOLDER ENGAGEMENT STRATEGY & PLAN 2024 Consultation timeline: 23/1/24 to 29/2/24
1. Energia	✓	
2. Bord Gais Energy (BGE)		✓ (Refer Appendix)
3. Ørsted		✓ (Refer Appendix)

We wish to thank all those who responded to our consultations contributing the valuable feedback outlined in this report from which we continue to build and strengthen our engagement and collaboration journey with all our customers, communities, and stakeholders.

All submissions received were shared across the ESB Networks business through the Stakeholder Engagement Steering Group to allow a collective analysis and consideration of the feedback to be made. This process also facilitated subject matter feedback outside the scope of this consultation, to be channelled to the relevant areas for further consideration.

We look forward to continuing to engage closely with all our customers and stakeholders throughout 2024, working inclusively with all groups on material issues, responding to issues raised and working towards beneficial impacts for our customers, stakeholders, and our business.

If you have any comments or require further information on this response, we would love to hear from you at stakeholder@esbnetworks.ie

Stakeholder Feedback - Key Themes & Our Response

There was one respondent (Energia) to our consultation on “ESB Networks Stakeholder Engagement Report for 2023”.

In general, Energia commended the 2023 report and the aims set out within it, which described the level of engagement ESB Networks has had to date with our stakeholders, and our commitment to continually improve engagement and the vital role engagement plays in our everyday operations.

Whilst they acknowledged efforts by ESB Networks to engage stakeholders such as through industry forums and workshops they set out the following four areas recommended for further consideration.

1. Stakeholder Engagement Culture

Energia recommended more frequent bilateral engagement with the retail market participants and suggested that communication and transparency on key issues is an area that could be further enhanced.

- 1.1 *“We welcome the engagement thus far with ESNB both at industry level, in terms of inclusivity, and engaging widely with customers and stakeholders, this is perhaps an area that could be enhanced. Stakeholders would welcome more frequent bi-lateral engagement with ESNB to ensure that market participants also have the opportunity to engage on a one-to-one basis when needed”.*
- 1.2 *“We are also of the opinion that communication and transparency on key issues is an area that could be further enhanced. This could be done through issuing official notes or statements to industry prior to industry forums (e.g., the Industry Governance Group). This will allow for further clarity on the issues at hand and will enable all stakeholders to discuss these issues. This would further support the report’s aims and allows for greater and even closer collaboration ensuring any decisions relating to work programme trajectories are robust”.*
Energia comment

Our Response to comment 1.1

ESB Networks endeavour to proactively engage with all market participants on a regular basis. We engage with market participants via established market fora, such as the Industry Governance Group (IGG), various IGG subgroups and workshops, extra-ordinary IGG meetings, Industry Liaison Group (ILG) and various technical working group meetings. Any queries arising from these market fora can be raised directly with the ESB Networks representatives or via the RMDS mailbox. Many Market Participants frequently utilise these pathways of engagement. It is important to note that ESB Networks are license obligated to take a non-bias approach in the service that we offer to all Market Participants.

ESB Networks commissioned two independent surveys in 2021 and 2023, to gain insight from market participants on their interactions with ESB Networks Retail Market facing services. Following on from these surveys, specific actions were developed and progressed by ESB Networks, one of which was around improving our engagement approach. As part of this action, ESB Networks embarked on a series of 1-2-1 sessions with all market participants, to directly receive and understand their feedback. We will continue this approach in 2024.

In addition, there are established regular operational engagements between ESB Networks' Retail Market Services, the National Smart Metering Programme (NSMP) teams and corresponding market participant operational teams. These engagement channels are outlined in the Market Message owners guide available online. Further information can be provided by contacting ESB Networks directly.

Our Response to comment 1.2

ESB Networks supports the need for close collaboration with industry stakeholders and aims to provide transparent and timely communication for all retail market related activities to market participants, particularly if an issue arises that may impact market participants.

Since 2021, the Retail Market Services (RMS) team within ESB Networks has conducted two stakeholder surveys with electricity suppliers that provide valuable feedback to the RMS team. Suppliers are also provided with an opportunity to engage directly with the independent research agency (Ipsos B&A), who conducted the survey on behalf of RMS, to provide additional anonymised feedback. The output of these surveys and subsequent 1-2-1 interviews are being used to develop annual action plans. A high-level view of the survey results and resulting action plans are presented to the Industry Governance Group (IGG) and regular updates are provided through the IGG forum in relation to progress against the action plan.

The IGG is an important forum which ensures the successful governance of the retail market and provides an opportunity to all market participants to both raise and discuss relevant market design items. ESB Networks IGG presentations are made available in advance of the IGG via the RMDS website and we aim to minimise any deviation from agreed RMDS timelines for publications of IGG material. The issuing of any official notes or statements to industry prior to industry forums would have to be considered in consultation with RMDS and the CRU, as chair of the IGG. ESB Networks encourages all market participants to attend industry forums and consideration would have to be given as to whether the issuing of detailed notes in advance may lead to less participation and attendance at the forum. ESB Networks has welcomed the return of in-person IGGs as we believe these in-person interactions will further enhance relationships with our stakeholders.

The implementation of the National Smart Metering Programme is managed through several industry working group meetings which meet monthly to review progress and adjust/optimize the messaging as appropriate. The ILG Terms of Reference was reviewed, updated, and agreed in 2023 and subsequent ILG meetings have adhered to the agreed timelines and meeting documentation. In advance of the meetings, an agenda is circulated along with the slide deck to all participants which sets out the key items and actions that will be discussed at the upcoming meetings. Following the meetings, the minutes are circulated among all participants for review and agreement. This consultative approach aims to reflect the diverse needs and considerations of the wide group of industry stakeholders.

2. Aligning work programmes

Energia recommended better visibility and alignment of ESB Networks various programmes of work (e.g., from NSMP and NNLC) which will help highlight key interdependencies and allow for more streamlined communications with stakeholders.

“Given the number of initiatives that ESBN are involved in and progressing, establishing a clear work programme for each work stream will provide visibility to key stakeholders of what will be delivered, by whom and when. A plan on page approach would foster better understanding of current and future trajectories of projects on one page, also adding clarity and transparency for stakeholders. For example, visualising the current and future trajectory of the NSMP, in conjunction with the expected timelines for V14-go live, the publication of the Smart Metering Data Access Code, the introduction of the In-home Display and how various components of these overlap with the NNLC and the National Energy Demand Strategy (NEDS). Such a plan would also highlight key interdependencies in these workstreams and allow for more streamlined communications with stakeholders. These work programmes all aim to support the energy transition and change the way people use, share and adapt to energy and system needs, and so cannot be developed and progressed in silos.”

Our Response

ESB Networks anticipates transformative change in the electricity industry in the coming years. In preparation for this, ESB Networks has put in place a new internal organisation structure Distribution Markets and System Operation (DMSO), which will facilitate increased coherence within ESB Networks.

ESB Networks recognises there will be a need to streamline our communications for the various work programmes currently underway and we are actively developing key documents which will enable better communications in this space under the new DMSO organisation structure. ESB Networks also recognises the need for approved plans and roadmaps to bring certainty, clarity, and transparency to the future of the retail market and its industry stakeholders.

We are proposing the development of a ‘Retail Market Roadmap’ and a ‘DMSO Blueprint’, the former of which we expect will need to be agreed by the IGG and ultimately the CRU. The aim of these documents will be to provide market participants with a better understanding of future changes impacting the Retail Market Systems and their high-level timelines which should provide retail market stakeholders with visibility to allow them to plan accordingly.

The Retail Market Roadmap will need to consider all the key demands that are facing the industry, including a better understanding of the expected regulatory driven changes. We believe this is the best approach to reach a consensus for a robust and achievable Retail Market Roadmap that can be successfully delivered by ESB Networks and all stakeholders within the industry. It will also be important to have a new Retail Market Roadmap governance process.

3. The ongoing need for Metrics

Energia recommended that enduring metrics are required to demonstrate and monitor the progress of various work programmes such as the National Smart Metering Programme.

“Energia believe that enduring metrics to demonstrate and monitor the progress of the work programmes and to capture the wider aspects of programme management such as meter configuration (i.e., CTF) and functionality to National Smart Metering Programme (NSMP) stakeholders are needed. This in conjunction with a plan on page approach and aligning work programmes will ensure a robust way of keeping track of the evolution and milestones reached within each of the different workstreams and will provide all stakeholders with a clear indication of the direction of travel and areas where improvements can be made along the way. These metrics should be accessible and updated by ESN to reflect any delays or progressions.”

Our Response

Metrics for the National Smart Metering Programme are provided at the monthly Industry Liaison Group (ILG) meetings. The data provided includes the number of meters installed, the number of customers on half hourly intervals (Meter Configuration Code 12), the number of customers on Day/Night/Peak Register Reads (MCC16), Non-Participant rates, Microgen metrics and the numbers utilising ESB Networks' Online Customer Account. The ILG also covers progress of the NSMP via its POAP for V14 and non-schema work items covered in our work plans e.g. In Home Channel. In addition, Suppliers receive the Comms Technically Feasible (CTF) information for their customers through market systems. ESB Networks are open to providing other metrics to Market Participants as agreed through industry channels such as the ILG.

4. Facilitating information access on the website

Energia recommended that improvements are needed to the website to make navigation and accessibility easier for publication and consultation documents. Please note that a similar comment was made by Bord Gais on our previous consultation on 'ESB Networks Stakeholder Engagement Strategy & Plan 2024' (refer Appendix comment no.5)

"A dedicated consultation and publication page should be set up going forward. This will allow for a distinction between publications and consultations on the website and will facilitate ease of access to relevant information for all those accessing the website. Additionally, where applicable, and as per practices employed by others (i.e. The Commission for Regulation of Utilities and EirGrid among others), consultation responses should be included alongside the consultation. We acknowledge that a major 18-month project to upgrade the website is ongoing and is due for completion in early 2025, yet short-term fixes could be addressed and progressed more swiftly."
Energia

"Continue improvements to navigation and accessibility on the ESNB website, the grouping of consultation documents/ responses/ outcomes by topic, and the provision of a notification subscription service for stakeholders. We ask that this website development process continue to focus on improvements to navigation and accessibility on the website, grouping of consultation documents/ responses/ outcomes by topic, and a subscription service."

Bord Gais comment on ESB Networks Stakeholder Engagement Strategy & Plan 2024.

Our Response

To deliver the commitments in our Networks for Net Zero strategy, and specifically delivering on our 'empowered customers' strategic objective, there has been a significant increase in initiatives to support the improvement of our website and to ensure we have best-in-class digital touchpoints. We are informing and promoting our enhanced online services, to our customers to support their adoption.

We have also increased the number of customer and stakeholder tools and we are designing a new consultations and publications page with enhanced features that will address stakeholder feedback. This is part of a website transformation programme which commenced in Q3 2023 and will run to Q1 2025. This will entail the current website migrating to a new cloud-based platform which will transform the website into a fully functioning online service platform for all our customers and stakeholders.

The website will evolve from a brochure style website to a service-led platform promoting self-serve options for customers and stakeholders. The website content and documentation published on it will adhere to Accessibility legislation WCAG 2.2 AA (Web Content Accessibility Guidelines).

Appendix

Summary of relevant feedback from our previous consultation on ESB Networks Stakeholder Engagement Strategy & Plan 2024

	BORD GAIS ENERGY COMMENTS	ESB NETWORKS RESPONSE
1	We ask ESN to improve the transparency of the requirements for, and procurement of, flexibility services. We encourage ESN to engage with stakeholders to establish the flexibility products procurement details to be shared transparently through a “central hub” platform to procure flexibility services easier and more transparently.	ESB Networks intends to publish sample procurement documents in H1 2024. This will include sample technical specification and a draft flexibility contract. While we envisage that e-tenders will still play a major role in the procurement process, we intend to be as transparent as possible to maximise the level of interest in the product. This may include publications related to the demand flexibility product and the locations that have been identified for the procurement of this product on the ESB Networks website.
2	The role of suppliers/ aggregators as the interface between DSO and consumers for flexibility services is recognised through ESN establishing open, transparent engagement to work in partnership with industry to outline the flexibility services requirements and invite expressions of interest and targeted engagement with industry at the appropriate fora to obtain these services rather than ESN going directly to customers.	ESB Networks has commenced the development of a strategy blueprint that accounts for the breadth of power system, retail market, flexibility market, smart metering, behind the meter infrastructure and consumer/ behavioural developments needed over the coming decade, in an efficient and integrated/strategic manner that supports progress but emphasises the role of discovery and adaptation over the course of its delivery. One of the key elements of this Blueprint will be a “Market/Regulatory layer”, which provides a framework for the introduction of new products and services to be delivered by competitive market participants. This framework provides for initial product development and testing in a market sandbox, to support innovation and more agility in bringing new solutions to market. Where these products or aspects of them deliver demonstrable value for customers or industry, they can transition into more mature markets, including flexibility and retail markets, pending the nature of the products, the competitive parties seeking to deliver these products, etc. It will be critical that suppliers, aggregators, and all prospective market participants have an active role in shaping this layer of the blueprint. ESB Networks recognises the need to work hand in glove with suppliers, aggregators, energy services companies and any company seeking to innovate and offer new smart energy or flexible demand services. The ambition is to support and stimulate the market by helping to address some of the market barriers and failures that exist today.

	BORD GAIS ENERGY COMMENTS	ESB NETWORKS RESPONSE
2	continued	<p>This could include offering education, awareness and products and services to support the understanding and uptake of flexible demand and then work with transitioning this activity, where relevant to other stakeholders. It could also include measures for example price structures and other incentives to help reduce the risk associated with product innovation and development under conditions where the returns available for flexible demand in the market are uncertain today.</p>
3	<p>Demonstrate the strong transparent collaboration between the DSO and TSO in providing a “whole of system” approach which we see as critical for optimising the delivery of flexibility services at transmission and distribution levels. This can be done by the provision of a clear and simple guide for industry as to how dispatch decisions for flexible products from each System Operator is expected to influence outcomes on the system of the other, as well as market outcomes overall, with participant workshops and interactive webinars</p>	<p>Since the Joint System Operator Programme commenced in 2021, industry participation and engagement has been a key focus of the programme. The system operators understand the need to actively engage with our key stakeholders to ensure that we address barriers to entry and shape incentives to maximise participation with our programme. Considering the learnings from 2023, we will continue to engage with industry to develop our future Multi-Year Plans and ensure our plan has been developed with inputs from our key stakeholders.</p> <p>Calls for input went out to the public and industry from the 04 August to 05 September 2023. Feedback and responses received from the consultation have been incorporated into the 2024 multiyear plan published on the ESB Networks and EirGrid websites.</p> <p>https://www.esbnetworks.ie/docs/default-source/publications/dso-tso-multi-year-plan-2024-2028.pdf?sfvrsn=90edb74b_9</p> <p>Furthermore, over the coming months, the TSO and DSO will jointly engage in a call for input for the 2025 – 2029 Multi-Year Plan with industry to ensure that the updated Multi-Year Plan reflects industry feedback. We intend to engage with industry on the TSO-DSO Operating Model in accordance with this plan and we will consider the respondents feedback when developing the engagement approach.</p>

	BORD GAIS ENERGY COMMENTS	ESB NETWORKS RESPONSE
4	<p>Continue the development of the engagement metrics framework. We ask that the development and refinement of the Framework continues so that each Focus Area identifies repeatable and enduring metrics that can show year-on-year improvements (or not) through good stakeholder engagement and includes metrics to clearly define and quantify timeline and cost reductions/ value benefit for the consumer. We ask that the metrics are evenly calibrated to equally reflect over, good, or under-performance by ESNB in aspects of stakeholder engagement</p>	<p>We will continue to measure our engagement success against the delivery of our business strategy targets which we have now mapped out to 2030 and published as part of our Networks for NetZero Strategy which we published in January 2023.</p> <p>Our engagement metrics framework is presented in terms of our three strategic objectives: Decarbonised Electricity, Resilient Infrastructure, and Empowered Customers. It links our Net Zero targets for each focus area to our 2023 high level engagement objectives, delivered engagements, and the effectiveness measured in terms of successful outcomes.</p>
5	<p>Continue improvements to navigation and accessibility on the ESNB website, the grouping of consultation documents/ responses/ outcomes by topic, and the provision of a notification subscription service for stakeholders. We ask that this website development process continue to focus on improvements to navigation and accessibility on the website, grouping of consultation documents/ responses/ outcomes by topic, and a subscription service.</p>	<p>ESB Networks are actively working on a long-term solution for this. A major website upgrade 18-month website upgrade project commenced in Q4 2023, which is due to complete in early 2025. In the meantime, we are working on some short-term fixes to this problem such as streamlining our publications and improving search functionality.</p>

	BORD GAIS ENERGY COMMENTS	ESB NETWORKS RESPONSE
6	Public Consultations and Planned Activities section of the ESBN website for stakeholders must be proactively populated well ahead of time so that stakeholders are informed on topic schedules and engagement timings. For example, we ask that these areas have the plans for 2024 published before the end of 2023. As with many aspects of stakeholder engagement, the earliest possible sharing of information (such as the consultation and publications list appended to the Plan 2024) is key to an optimal outcome.	We will continue to provide lists of our planned consultations, publications, and events as part of our annually published engagement strategy and plans. We will endeavour to provide this information as far in advance as possible to allow our stakeholders visibility of our planned activities and will endeavour to provide timely updates if and when these plans change.

	ØRSTED COMMENTS	ESB NETWORKS RESPONSE
7	Connecting Renewables: It is positive to see that quarterly meetings will be offered to large customers. We look forward to engaging and to receiving details about how to proceed with this.	ESB Networks are delighted to offer bilateral meetings to all our large customers and look forward to engaging directly with all large customers with regard to the delivery of their portfolio of projects.
8	It is positive to have an Advisory Council in place. We would welcome more information of the governance and selection of representatives. We are confident that we would play a constructive role towards the delivery of ESB Networks strategic goals.	More information on the NN,LC Advisory Council, including Terms of Reference (which covers remit and membership) are published on the ESB Networks website: https://www.esbnetworks.ie/who-we-are/national-network-local-connections-programme/our-advisory-council . Presentations and meeting minutes from previous advisory council meetings can also be viewed at this location.

	ØRSTED COMMENTS	ESB NETWORKS RESPONSE
9	<p>We acknowledge that improvements are being made such as the publication of a capacity heat map but unfortunately this is built off static data rather than dynamic data, so its relevance diminishes with increasing time after publication. Data on network assets is commonplace in other jurisdictions, for example NIE has an open data hub which describes assets and their rating, the Distribution Network Operator UK Power Networks has an Open Data portal which provides access to shapefiles for asset locations, operational boundaries, asset data (rating), operational data, historical data flows, curtailment events, use of flexibility services, etc. The Open Data portal also provides network schematics indicating typical network feeding arrangements. Data from the portal is provided via APIs which transfer the information easily into other software systems.</p>	<p>ESB Networks welcome this feedback. We are currently working on many data initiatives that should improve the visibility of asset data requested by the customers. The capacity heatmaps on our website will be updated on a quarterly basis as required by legislation, and this is currently considered to be adequate timeframe due to this data having slower pace of change. We are considering the Open Data portal as well, however, due to the early stage of this initiative we cannot commit to any timeframe on this at the moment.</p>
10	<p>We welcome the publication of the expected public consultations, publications, and pathways to engagement. This information is very helpful to understanding policy direction and priorities for the year ahead. For example, consultation on the DSO/TSO Multi-Year Plan 2025 - 2029 is keenly awaited and confirmation that it is to take place in Q3 is helpful to forward planning.</p>	<p>ESB Networks welcome this feedback, and we will continue to publish any updates to our consultation's listings throughout 2024.</p>