



NETWORKS

Stakeholder Engagement Report 2024 Response Paper

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Contents

Introduction	3
Key themes and our response to stakeholder feedback on ESB Networks' Stakeholder Engagement Report 2024	4
Appendix 1 - Key themes and our response to stakeholder feedback on our Stakeholder Engagement Strategy & Plan 2025	6
Conclusion	12

Introduction

This response paper is intended to be read in conjunction with [‘ESB Networks Stakeholder Engagement Report 2024’](#) which was open for public consultation from 28 March 2025 to 2 May 2025. It summarises the feedback and recommendations submitted to ESB Networks in response to the consultation and outlines our response to the feedback received.

In December 2024, ESB Networks also published for consultation [‘ESB Networks Stakeholder Engagement Strategy & Plan 2025’](#). For completeness, we have included an appendix to this response paper which captures relevant stakeholder feedback and recommendations from that consultation process. Comments relate to our ongoing engagement performance and include recommendations for further improvement.

In total, there was one respondent to the consultation on ESB Networks’ Stakeholder and Engagement Plan 2025 and one respondent to the consultation on ‘ESB Networks Stakeholder Engagement Report 2024’. In both cases, the respondent was Energia.

We wish to thank Energia for responding to our consultations and for contributing valuable feedback, as outlined in this report. Their insights and contributions will help to inform and strengthen our stakeholder engagement approach and activities for the benefit of all our customers, communities, and stakeholders.

The submissions received were shared across ESB Networks through the ESB Networks’ Stakeholder Engagement Steering Group to allow for collective analysis and consideration of the feedback. Through this process, it was agreed that the feedback would be comprehensively addressed through this response paper, rather than updating or republishing the Stakeholder Engagement Strategy & Plan 2025 or the Stakeholder Engagement Report.

We look forward to continued engagement with our customers and stakeholders throughout 2025, 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, please contact us at stakeholder@esbnetworks.ie

Key themes and our response to stakeholder feedback on ESB Networks' Stakeholder Engagement Report 2024

There was one respondent, Energia, to the consultation on "ESB Networks Stakeholder Engagement Report 2024".

System Flexibility

In relation to the area of System Flexibility, Energia highlighted the positivity and inclusivity in the engagements regarding the National Network, Local Connections Advisory Council Meetings.

They also noted that ESB Networks:

"indicated that a DSO market blueprint would be shared with industry. While the Report states that they've engaged with DECC & CRU on this matter, market participants haven't yet had visibility on this blueprint.

These market changes are likely to be transformative and, in order to deliver effectively, may involve a large resourcing demand. Therefore, early engagement with suppliers is key to enable us to effectively plan and resource and would be greatly appreciated.

An holistic approach will be required as it is likely there may be technology resourcing constraints within market participant organisations, in parallel with delivering changes in SEM, transformation of retail market systems is required to facilitate implementation of the Electricity Market Design Directive and Clean Energy Package. Therefore, alignment and prioritisation of deliverables will be needed."

Our Response:

ESB Networks appreciates this detailed feedback and recognises that the insights will help us as we approach future engagements.

We agree that the changes to the retail electricity market are transformational, and that it will take time to consider the legal, regulatory, governance and systems impacts for all stakeholders.

ESB Networks has engaged extensively with the CRU and with the Department of the Environment, Climate and Communications (DECC), to ensure there is understanding and alignment on the overarching activities needed to deliver on requirements. We recognise and acknowledge that industry engagement and input is key to ensuring full alignment across all stakeholders. We are now in the final stages of finalising the DMSO Blueprint Document and we anticipate publication in the coming weeks.

Renewable Connections

In relation to Renewable Connections, Energia noted that:

ESB Networks “sought to provide clarity and additional support to the various connection processes, including the Enduring Connection Policy (ECP). A noticeable scope creep has occurred in the requirements associated with System Operator Preferred Connection methods in recent ECP rounds. While this is the purview of EirGrid, Energia appreciate that the ultimate owner of the connection assets will be ESN. The concern from industry is that EirGrid is leveraging its position as the sole provider of Transmission connections, by forcing onerous conditions on contestably delivered connections. If developers prove incapable of delivering these connections (or chose not to) it’s not clear how enough connection infrastructure will be delivered on time, the blame for which may land with ESN to some extent. Energia believe it is timely to improve the level of engagement across developers, ESN and EirGrid to implement best practices and coordinate the delivery of the necessary infrastructure on time. A coordinated approach that leverages the strengths of each participant is ultimately to the benefit of the end consumer and the achievement of climate related targets.”

Our Response:

EirGrid and ESB Networks are both fully committed to delivering the Climate Action Plan (CAP) targets.

As per their Transmission Licence obligations, EirGrid, in their capacity as Transmission System Operator (“TSO”) is required to;

- plan the long-term ability of the transmission system to meet reasonable demands for the transmission of electricity; and
- contribute to security of supply through adequate planning and operation of transmission capacity and system reliability.

In line with this, EirGrid is required to define the connection processes in order to maintain the safety, security and resilience of the transmission system, while also meeting the needs of demand and generation customers. As Transmission Asset Owner (“TAO”), ESB Networks collaborates closely with EirGrid, but is not in a position to influence or change the Transmission Connection Agreement process.

Appendix 1 - Key themes and our response to stakeholder feedback on our Stakeholder Engagement Strategy & Plan 2025

There was one respondent, Energia, to our consultation on “ESB Networks Stakeholder Strategy & Plan for 2025”.

In general, Energia commended the 2025 Strategy and Plan, which describes the programme of stakeholder engagement that ESB Networks intends to undertake in 2025, along with our commitment to continually improving our engagement performance.

While Energia acknowledged efforts by ESB Networks to engage stakeholders and welcomed the detailed and transparent timeline of planned consultations over 2025, Energia set out the following recommendations for further consideration.

System Flexibility & Electrification

Engagement with and across industry is key to ensuring the delivery of ESN's work programmes. The commitment to quarterly engagements with industry bodies for example in the Connecting Renewables focus, is positive. Energia would like to encourage ESN to engage with industry stakeholders either quarterly or biannually for the System Flexibility and Electrification focus areas.

Our Response:

ESB Networks appreciates the feedback on future engagement with industry stakeholders in regards System Flexibility and Electrification.

We recognise the critical role we play in enabling Ireland's transition to net zero. Our stakeholders, including industry, help us to shape our strategy by sharing their insights on priorities, new approaches and innovation opportunities. We seek opportunities to proactively engage with our stakeholders on a regular basis and have already established the following engagement structures.

1. Engagement activities to support System Flexibility

Advisory Council: ESB Networks engages with external stakeholders on the topic of system flexibility through the Advisory Council on the National Network, Local Connections programme. The Advisory Council was established to guide and inform the Distribution Markets & System Operation (DMSO) in relation to decision making and policy development.

The role of the Advisory Council is to ensure that stakeholders have early and ongoing transparency of programme developments and an opportunity to shape the agenda and direction of travel. We aim to hold three sessions each year, with the most recent meetings occurring in February 2025, June 2024 and September 2024.

External Consultation (Call for Input): In addition to the National Network, Local Connections (NN, LC) Advisory Council, the NN, LC conducts external consultations, particularly through our annual Call for Input, which invites feedback from stakeholders to inform our Flexibility Multi-Year Plan as required under our existing Price Review 5 (PR5) requirements.

In 2024, we received seven responses to the Flexibility Call for Input and five responses to the Joint System Operator Plan (JSOP) consultation. These consultations are essential for understanding stakeholder perspectives and integrating their feedback into our planning processes. By actively seeking input from our stakeholders, we enhance our service delivery and ensure that our initiatives align with the broader goals of the energy sector.

Flexibility Multi-Year Plan¹: The Multi-Year Plan outlines our key deliverables and milestones for the coming five-year period and is submitted to the CRU for approval. The plan includes key milestones such as the introduction of flexible demand connections and the development of new products and services to support customer participation in the energy transition.

The Multi-Year Plan is informed by our ongoing engagement with external stakeholders, particularly via the Call for Input process. Once approved by the CRU, the Multi-Year Plans are published on the ESB Networks website [ESB Networks – Flexibility Multi Year Plan 2025-2029](#).

Webinars: In tandem with our NN, LC Advisory Council, Call for Input and Multi-Year Plan processes, the NN, LC actively engages stakeholders through a variety of other methods such as ad hoc consultations, public webinars, etc.

In June 2024, we held two webinars on the JSOP Operating Model, attracting 177 registrations for the session on 14 June and 143 registrations for the session on 27 June.

Additionally, following the publication of the second consultation paper on our Demand Flexibility Product, the NN,LC facilitated a webinar on the Demand Flexibility Product in November 2024 with 129 registrations. This webinar provided an opportunity to brief external stakeholders on the details of the second consultation and an opportunity for feedback.

These webinars not only facilitate the dissemination of important information but also encourage active participation from stakeholders, reinforcing our commitment to fostering a collaborative environment that supports the successful implementation of our initiatives. By providing these opportunities for engagement, we aim to build a strong network of informed stakeholders who can contribute to the ongoing development of our programmes.

¹ [ESB Networks – Flexibility Multi Year Plan 2025-2029](#)

2. Engagement activities relating to electrification

ESB Networks proactively engages with stakeholders to support the electrification of heat and transport. Our plans for 2025 include continued engagement with a wide range of Government and industry bodies in the transport sector, including the Department of Transport (DoT), Zero Emissions Vehicles Ireland (ZEV) led working groups (WG's), transport agencies such as Transport Infrastructure Ireland (TII), ports and airports authorities and the newly formed Electric Vehicle Charging Alliance of Ireland (EVCAI). We will continue to support and participate in targeted stakeholder workshops, conferences and customer one-to-one's.

Similarly, in relation to the electrification of heat, we are engaging with Government and industry stakeholders and participating in pilot projects to assess and share learnings on the impact of the electrification of heat on the electricity network.

We are open to convening electrification stakeholder events biannually to discuss developments and share insights and will give further consideration as to how this can be achieved.

3. Stakeholder Engagement Culture

Energia provided the following feedback in relation to stakeholder engagement culture in ESB Networks:

- 3.1 *The "Planned Engagements" section offers a useful roadmap for the year ahead. However, Energia recognises the potential for change to these engagements as new or unforeseen issues emerge and so would welcome further updates throughout the year on any amendments to these planned engagements.*
- 3.2 *ESBN to industry communication is important to help inform business and project development. Therefore, any further commitments to routine stakeholder engagement sessions where updates on the status of ESBN workstreams, even in the absence of forward progress, would be valuable for stakeholders.*
- 3.3 *Emphasis on the importance and utility of Appendix 1 which provides a detailed timeline of planned ESBN consultations. This transparency is hugely valuable as it enables stakeholders to anticipate and prepare for upcoming workstreams. Energia would encourage ESBN to publish updates to this appendix throughout the year if timelines move and to continue this practice into future years.*
- 3.4 *Stakeholder methodology principles include inclusivity, materiality, responsiveness, and impact, in terms of inclusivity, and engaging widely with customers and stakeholders, this is perhaps an area that could be enhanced.*

Our Response:

Thank you for your feedback regarding stakeholder engagement communication and transparency. ESB Networks is committed to constantly improving our engagement performance, as engagement is integral to our day-to-day operations and is at the heart of everything we do at ESB Networks.

To support this, we will continue to provide lists of our planned consultations, publications, and events and 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.

At ESB Networks, we understand that we have a vital role to play in Ireland's energy transition, and we know we cannot do this alone. Collaboration is necessary to successfully deliver our Networks for Net Zero Strategy and ensure that the network is prepared to meet the changing and evolving needs of our customers in a clean electric future.

Given our central role in the electricity industry connecting over 2.5 million homes, farms, communities, and businesses around the country, we have a very broad range of stakeholders. We undertake an annual mapping exercise of our stakeholders to identify new groups in consideration of changing priorities, the segmentation wheel outlined in the report, is a working example of how we are looking to improve the granularity of our stakeholder mapping through further subgrouping and segmentation. This will enable us to be even more purpose driven in how we conduct our engagement activities and help to ensure that we are driving inclusive engagement by not leaving any stakeholder group behind.

During 2024, and as part of the development of our PR6 business plan, we engaged extensively with a wide range of stakeholders, communities and customers throughout Ireland. This expansive engagement included a stakeholder consultation paper in which we invited feedback and a stakeholder webinar, attended by participants representing 34 individual industry groups. The webinar provided a summary of our proposed investment approach and was followed by a Questions and Answers (Q&A) segment. The consultation was also supported by an information video featuring our Managing Director, Nicholas Tarrant and was posted on various social media sites.

The engagement process for PR6 also included targeted engagement through bilateral meetings, industry presentations, qualitative and quantitative research, and focus groups. These engagements provided valuable insights into our stakeholder and customers' priorities and their views on industry issues such as capacity, flexibility, innovation, safety and electrification.

This approach to stakeholder engagement ensured that customer and stakeholders were at the heart of our business planning process for PR6.

4. ECP

Energia provided the following feedback relating to stakeholder engagement around the ECP process:

- 4.1 *Energia supports ESN's planned engagements around ECP webinars and pre-engagement clinics and processes, it is important that these clinics are sufficiently resourced to meet demand considering HLTA requirements for RED III projects.*
- 4.2 *Developers must be given sufficient time to complete a HLTA application in advance of the September 2025 batch. Considering the rigour of the process, a period of 4-5 months would be the minimum timeframe within which a HLTA application would be expected to be concluded in Energia's opinion.*

Our Response:

Thank you for your feedback relating to the ECP process and High Level Technical Assessment (HLTA) requirements for Renewable Energy Directive III (RED III) projects. ESB Networks welcomes the opportunity for external collaboration in relation to this.

We recognise the importance of the Enduring Connection Policy Generation & System Services (ECP-GSS) process and will be hosting a webinar following the CRU decision paper on the pre-engagement process. ESB Networks is currently supporting the CRU in developing the pre-engagement process which includes details on the HLTA application and processing timelines. The ECP-GSS pre-engagement process is important in providing ESB Networks with visibility on the pipeline of generation projects and in particular RED III project seeking a connection to the distribution system.

5. Project Conversion Rate and Project Recovery

Energia also make the following recommendation:

- 5.1 *Through better industry coordination, ESB Networks could flag where the delivery of a project is failing and afford the opportunity to other projects and developers to step in and displace a failing project.*

Our Response:

ESB Networks publishes a list of the contracted projects on its website. It would not be appropriate for ESB Networks to comment on the delivery status of any individual project as this information is commercially sensitive. Developers may view the Renewable Energy Support Scheme (RESS) auction results which are publicly available and make their own assessments of whether projects are on track.

6. Retail Market

In relation to the retail market operations, Energia provided the following insights:

- 6.1 *Engaging with market participants through ad hoc workshops (e.g. to discuss the introduction of the balance scorecard etc.) would be useful.*
- 6.2 *Carry out refresher training session with market participants.*
- 6.3 *More frequent bi-lateral engagement (than biannually as indicated in the report) with ESB Networks to ensure that market participants also have the opportunity to engage on a one-to-one basis when needed. We are of the opinion that communication and transparency on key issues is of utmost importance.*

Our Response:

Thank you for your valuable feedback regarding our engagement with market participants.

Regarding the Balanced Scorecard, this is managed by the Assurance Body with the agreement of the CRU. We recognise the importance of industry forums in facilitating discussions and agreements on changes and retail market impacts with all market participants. These forums also allow for the formation of subgroups, such as the Technical Working Group (TWG) and ad hoc workshops as the need arises. ESB Networks supports further activities in this space where appropriate, which will enhance dissemination and transparency across all relevant stakeholders.

While internal business process training and succession planning are the responsibilities of individual market participants, RMDS is available to support all Market Participants (MPs) with any questions related to retail market design. ESB Networks is committed to ensuring that all supporting market design materials are accessible to MPs and are published on the appropriate websites.

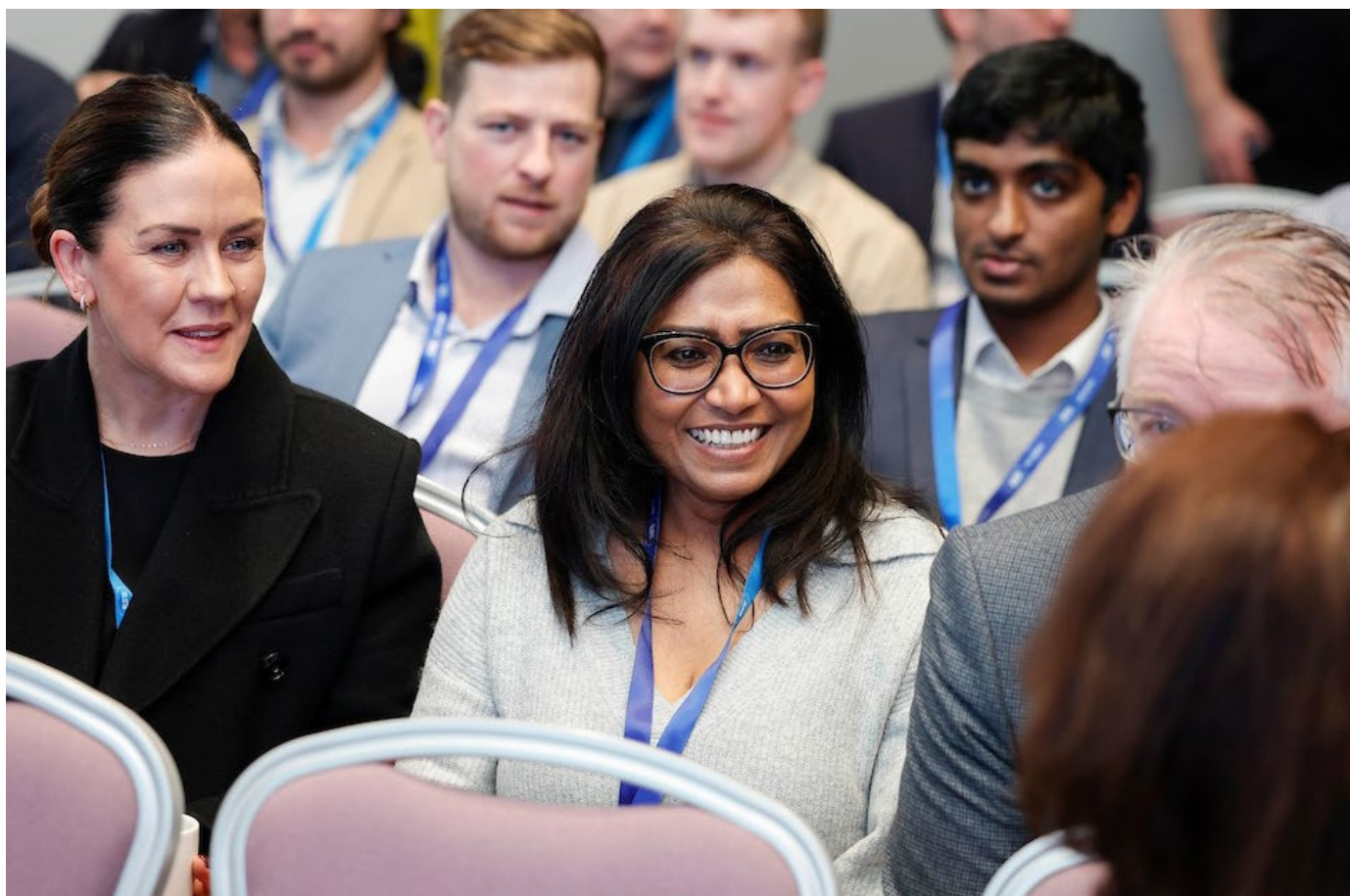
ESB Networks has established positive operational relationships with MPs, and feedback on these bi-lateral engagements has been very encouraging. We remain available to address issues outside of regular engagements and will continue to communicate matters of interest to MPs across the Retail Market through the Industry Governance Group (IGG) and other established communication channels, such as RMDS mailing lists, to ensure transparency and share learnings.

Conclusion

We wish to thank Energia for their valuable feedback outlined in this response paper.

We look forward to continuing to engage closely with all our customers and stakeholders throughout 2025, working inclusively with all groups and responding to issues raised.

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





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