



NETWORKS



# RESPONSE PAPER

ESB Networks Response to Stakeholder  
Feedback received on our Engagement  
Performance in 2020

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## Introduction

This response paper is intended to be read in conjunction with ESB Networks' ['Report on Stakeholder Engagement in 2020'](#) which ran for public consultation from 22<sup>nd</sup> March 2021 until 30<sup>th</sup> April 2021.

It describes key feedback and recommendations received on ESB Networks stakeholder engagement performance, which is the subject of an incentive scheme evaluated by the Commission for Regulation of Utilities (CRU). It also describes how ESB Networks is responding to this feedback.

We wish to thank all our stakeholders for taking the time to engage with us on this report providing valuable feedback not only on our past performance in 2020 but also providing constructive recommendations to improve our engagement strategy and planning going forward.

In late December 2020 we also published for consultation our ['Stakeholder Engagement Strategy & Plan 2021'](#). We have included in this response paper relevant feedback from that consultation process as it also related to our engagement performance for 2020 and provided valuable recommendations for how we can continue to improve our engagement approach and performance going forward.

The structure of this report is as follows:

**Section 1** provides a review and analysis of stakeholder feedback regarding our overall stakeholder engagement performance in 2020. This is described in terms of the evaluation criteria; engagement strategy; implementation through a delivered set of channels and initiatives and the overall effectiveness to our stakeholders and business alike.

**Section 2** highlights some of the key areas for improvement raised by our stakeholders which will help inform our future engagement strategy and approach.

For a more detailed review of each respondent's feedback and our response on both our 'Report on Stakeholder Engagement in 2020' and our 'Stakeholder Engagement Strategy & Plan 2021' please refer to the tables in the **Appendix**.

We appreciate 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.

## Section1: Feedback on our 2020 Engagement Performance

There was a total of ten respondents to our recent stakeholder engagement public consultations:

List of respondents	Report on Stakeholder Engagement in 2020 Consultation timeline: 22/3/21 to 30/4/21	Stakeholder Engagement Strategy & Plan 2021 Consultation timeline: 22/12/20 to 12/2/21
1. Chambers Ireland	✓	✓
2. UCD Energy Institute (UDCEI)	✓	✓
3. Bord Gais Energy (BGE)	✓	✓
4. Demand Response Aggregators of Ireland (DRAI)	✓	✓
5. Dingle Hub	✓	✓
6. Irish Solar Energy Association (ISEA)	✓	✓
7. MaREI, SFI Centre for Energy, Climate and Marine	✓	✓
8. Wind Energy Ireland	✓	✓
9. Energy Storage Ireland	✓	✓
10. Bord Na Mona	✓	✓

All submissions received were shared across the ESB Networks business through the Stakeholder Engagement Steering Group. This allowed a collective analysis and consideration of the feedback to be made and facilitated subject matter feedback outside the scope of the consultation on our 2020 engagement performance to be channelled to the relevant areas for consideration.

In summary, the respondents to the consultations welcomed the positive and increased focus on stakeholder engagement and developments that have taken place in 2020. They commended ESB Networks for “positive actions and meaningful engagement in 2020 despite the difficult circumstances due to the COVID-19 pandemic”. The benefit of continued engagement particularly during this uncertain time of the Covid-19 pandemic was highlighted and the continued use of technology to engage stakeholders was emphasised. Many respondents acknowledged the value of several new engagement activities introduced to date such as the webinars, workshops, surgeries, and additional meetings. The importance of the campaign “We Keep the Nation Humming” was called out as being very effective in communicating the role of ESB Networks.

## Our Stakeholder Engagement Strategy

In accordance with the feedback and recommendations outlined in the [NSEE Panel Close-out Report 2019](#), we published ahead of 2020 (December 2019) an enduring stakeholder engagement strategy document and engagement plan for 2020. However, the onset of the COVID-19 pandemic in March 2020, and the resulting nationwide restrictions introduced by the Government to limit the spread of the virus, had a major impact on all our customers and stakeholders and subsequent plans for engagement.

In responding to this challenge, we were guided by our ESB Networks values in placing our customers' current and future needs at the heart of what we do whilst ensuring we keep ourselves and others safe and healthy. We adopted a proactive approach, identifying those groups deemed critical to the fight against the virus and those who are most vulnerable, putting in place engagement mechanisms to communicate with and support these customers and organisations. Using our Crisis Management Team as an overarching structure, we put in place a Critical Stakeholder Team to lead this engagement process. This team was led by the Strategic Engagement Manager and included many members of the already established Stakeholder Steering Group, which coordinates engagement activity across the business. The positive impacts of the strategy and approach adopted in response to COVID-19 is described in our report through a number of case studies in the section titled "Serving our Customers and Stakeholders". We appreciate the supportive comments received from our stakeholders such as;

"2020 provided significant challenges arising from the Covid19 pandemic. The report outlines the changes required of ESBN in terms of business practices and engagement and we commend the role ESBN has played in ensuring a secure electricity supply, in particular to essential services." - UCD EI

"We also recognise the efforts made by ESBN to continue the focus and support of stakeholder engagement activities across 2020 despite the impact felt by all from Covid-19." - BGE

In Q4 2020, we provided an update to our original 2020 engagement plans through our report '[How Stakeholder Feedback is Shaping our Engagement](#)'. This report was published to describe how we implemented and continually adjusted our strategy and plans for 2020 based on our response to COVID-19 and our ongoing stakeholder feedback. We also developed ESB Networks Stakeholder Engagement Strategy & Plan 2021 in quarter 4 2020, taking on board stakeholder feedback received throughout the year. It was published for public consultation to allow our stakeholders to help further shape our strategy and plans for 2021 and beyond. Our strategy for 2021 provides more specific objectives, actions and measures of success for each proposed area of engagement as recommended by the NSEE Panel.

"The Strategy should set the tone and expectations, detailing targets (quantitative where possible) against which performance will be assessed later in the process". - NSEE Panel

We welcome the positive feedback regarding our efforts to ensure our engagement strategy was founded on our ongoing stakeholder feedback.

"BGE acknowledges the updates made to ESBN's Engagement Strategy in 2020 using the stakeholder feedback received. Its publication along with the [Stakeholder Engagement] Plan 2021 for consultation in January 2021 was also a welcome improvement as recommended by the NSEE Panel. The publication of the "How Stakeholder Feedback is Shaping our Engagement" document supports the improvements made by ESBN in engagement strategy and processes using feedback and recommendations" - BGE

## Reporting and Governance

In response to feedback received from our stakeholders and the recommendations in the [NSEE Panel Close-out Report 2019](#), specific changes and improvements were adopted in our reporting and governance for 2020. For example:

- ✓ We provided a broader range of case studies from across the organisation to address the NSEE panel recommendation to provide “[Greater emphasis on the BAU aspects of the DSO’s activities](#)”. Engagement on ‘business-as-usual’ activities remains a key part of our overall stakeholder engagement process. Several case studies in our report focus on engagement on the daily activities that are carried out to ensure electricity gets to the homes and businesses of our 2.3 million electricity customers in a safe and efficient manner.
- ✓ In all 18 case study examples, we described the Purpose, Implementation, and Impact/Benefit of each engagement activity. We further quantified where possible in our “Measures of Success” section a metric to describe the perceived impact or benefit of the engagement to our stakeholders. In addition, we included in our table of Consultations in 2020, a metric to capture the volume of response and output from each consultation process. This reflects the NSEE panel recommendation stating that “[The impact of stakeholder engagement should be quantified insofar as possible.](#)”
- ✓ As requested by the NSEE panel we included “[full lists and timing of the engagement events, including consultations](#)”. We also have included a list of our publications including response papers to our consultations and other guide material that may be of interest to our stakeholders.
- ✓ We expanded our “Feedback and Learnings” section to show how we are listening and acting on stakeholder feedback. “[Regarding lessons learned, the Panel would welcome to see in the report how learnings from specific engagement activities feed into the overall strategy.](#)”

We are pleased that our stakeholder respondents commented on the effectiveness of these improvements. For instance, it was noted that the report;

“[shows an exemplary level of engagement across various stakeholders – across a diverse range of projects and processes - using a multitude of methods. It presents a fantastic body of work.](#)” - BnM.

“[The format and content of the 2020 Report demonstrates ESBN’s stakeholder engagement performance against both the recommendations from the NSEE Panel Close Out Report completed in 2020, and the CRU20106-The-NSEE-Panel-Close-out-Report-2019.pdf Page 2 of 4 reporting criteria from the PR4 Reporting and Incentives Decision \(May 2018\).](#)” - BGE

“[It is useful to see feedback from the NSEE panel included in the report and addressed and we look forward to seeing how the recommendations provided by the panel continue to flow into ESBN’s stakeholder engagement activities](#)”- WEI

Many respondents also called out the benefits of providing the listing of planned engagements outlined in the document (including consultations, publications, and pathways to engagement) as this helps provide clarity on the areas for potential interaction. One respondent noted that it may be useful to use these tables going forward to help us measure the success of our planned engagements by tracking actual versus planned. This is something we believe would be very useful and we will certainly aim to incorporate this suggestion into our next report.

## Our Response

We welcome the above positive comments and are committed to the continual improvement of our overall engagement strategy, reporting and governance. We will continue to revise our plans for 2021 to reflect stakeholder recommendations and provide updates of these through our published tables of planned engagement activities on the ESB Networks website.

Our stakeholder steering group made up of stakeholder leads from across the business is key to maintaining strong governance and reporting on our stakeholder engagement. For instance, it provides direction to the stakeholder engagement feedback process. We will be further developing a framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process across ESB Networks.

We will continue to strengthen our steering group with business leads from across the specified areas of engagement focus for 2021 and beyond. For example, with the rollout of the Active System Management project in late 2020, a dedicated ASM Engagement & Communications manager was appointed and joined the overall Stakeholder Engagement Steering Group in December 2020.

## Implementation/Impact of a delivered set of channels and initiatives

During 2020, we have undertaken many new initiatives and improved our pathways to engagement which we describe through several case studies in our 2020 report. These new channels and initiatives included:

- Innovation webinar series (Spring & Autumn)
- Additional bilateral meetings and workshops as requested
- 'Heat Capacity Maps' information on website and supporting webinar
- Additional ECP connection meetings
- Creation of a "Critical Stakeholder Team" providing dedicated points of contact to critical infrastructure
- Distribution Outage Planning process
- "We keep the Nation Humming" media campaign
- Improved digital online services such as the Connections Portal & PowerCheck App
- Published tables of Consultations, Publications and Events/Pathways to engagement
- Stakeholder Newsletter
- Improved Stakeholder website pages
- External Stakeholder Panels (Innovation and Customer & Society Panels)
- 'Lean Connections Project' key stakeholder engagements
- Community engagement initiatives (e.g. Dingle Hub projects, Creation of a Community-led Renewable Energy Projects Liaison Panel, published Guidebook and FAQ section on the website)
- ESB Networks "Powering the Change" webinar series

We are delighted that all our respondents welcomed these new engagement activities and found them to be beneficial to their organisations. Some examples of positive stakeholder feedback included:

“We commend ESB Networks on the wide variety of channels developed and delivered to enable information sharing and genuine engagement that is of value to both stakeholders and ESB Networks alike. Despite the challenges of the pandemic, it is clear that the journey to meaningful engagement has continued and accelerated through 2020”. - Dingle Hub

In recent years, ESB Networks have increased the volume of outreach activities to engage with the market, which has been a very positive development. The DSO should be commended for this.” - ISEA

“Changes to engagement practices such as the introduction of the Innovation Webinar Series and the strategic webinar series “Powering the Change” were also extremely positive. These provided accessible opportunities for a wide range of stakeholders to engage in topics of interest to them. The opportunity to feed into the topics to be covered is also a welcome development. While the networking opportunities of in-person events do not arise, these webinars do provide a useful platform for sharing information and ensure ongoing engagement.” - UCD EI

The establishment of the Innovation Stakeholder Panel provides a good opportunity for discussion of projects and activities. The introduction of a Customer and Society Panel is also very welcome as it essential that the energy user is at the centre of the energy system” - UCD EI

“We also note the introduction of the “Powering the Change” interactive webinar series targeting a wide range of stakeholders, and the production of the accessible Community-led Renewable Energy Projects Guidebook (and subsequent web page and ‘Empowering Community-led Renewable Energy Projects’ webinar in Q1 2021).” - MaREI

“The enhancement by ESBN in online channels for stakeholder engagement and key digital services in 2020 including new connections, online applications, and digital quotes for new connections demonstrates flexibility by ESBN to ensure these aspects of the 2020 Plan remained deliverable in the Covid-19 impacted environment.” - BGE

“Our members acknowledge the considerable efforts ESB Networks made to continue engagement with stakeholders during 2020, under the very difficult circumstances that were created by the pandemic”. - DRAI

## **Our Response**

The impact of the COVID-19 pandemic means that more than ever we need to maintain strong pathways for stakeholder engagement. We will continue to adopt new channels to enable us to work effectively and to continue to collaborate and share ideas, while also supporting each other through this unprecedented period. We also look forward to a time when conditions allow us to reintroduce face to face engagements, which can only serve to strengthen relationships and understanding of our stakeholders’ needs.



We have continued the rollout of our Strategic Webinar Series into 2021 and will be further engaging with our stakeholders later in the year to seek their feedback and views to shape future sessions. Our Spring and Autumn Innovation webinar series will take place in 2021 as planned. The topic list for our upcoming Spring Innovation webinar series was circulated for our stakeholders to vote on their preferences and the resultant schedule was shared with our stakeholders in Q2 2021.

Our new website is due to go live in June 2021. In the meantime, during 2020, we implemented several improvements to our website including; a new section specifically for Stakeholder and Public Engagement (within this section we share details of our stakeholder engagement opportunities and activities, as well as information on our public consultations); an updated and revamped innovation section to increase transparency of our innovation activities in line with stakeholder feedback; and a new dedicated section for community-led renewable energy projects. In addition to the website updates, key digital services are now being provided for customers including new connections, online applications, digital quotes for new connections and updates to the PowerCheck App.

Throughout 2021 we will continue to facilitate both new and existing bilateral meetings across industry, academic and public organisations which have been requested by a number of stakeholders. We will also use our new External Stakeholder Panels as platforms to enable open discussion and feedback with a broad range of stakeholders from across all industry, customer, and society sectors. A request was made for further community representation onto the Customer & Society Panel, which was facilitated in time for the first meeting of this panel which took place in April 2021.

## Specific engagements called out by our stakeholders

### Engagement on Price Review 5 (PR5)

Following on from the extensive engagement process carried out in 2019, further collaboration with a broad range of strategic stakeholders and customers was undertaken throughout 2020 to work towards a Price Review Determination that would reflect the needs of both ESB Networks and our stakeholders.

A series of targeted workshops with stakeholders were conducted throughout Quarter 3, using a Skype for business presentation format with menti.com used to capture stakeholder feedback. During these workshops, ESB Networks presented the detail of the draft determination and described what it meant for our programme of work for the next five years. We welcomed the input that our stakeholders contributed and discussed the potential impact of the determination for our customers and stakeholders. This two-way communication enabled a collaborative consultation response and the contribution of our stakeholders resulted in material improvements between the draft and final determination.

Many respondents called out the benefits of this engagement approach on PR5, where a collaborative engagement approach with industry was adopted to deliver a successful outcome.

“The DRAI recognise the considerable and proactive effort ESB Networks made to engage with members during the PR5 consultation period. Our members found the approach to engagement, the detailed presentation of the proposed activities and the explanation of the various mechanisms, really very beneficial in assisting our understanding of the work programme proposal for the PR5 period.” - DRAI

“Welcome and thank ESNB for the many positive steps and initiatives undertaken in 2020 in relation to stakeholder engagement in areas such as PR5, where a collaborative approach with industry delivered a successful PR5 outcome,” - WEI

## Our Response

As we commence this new price review period 2021-2025, we would like to thank our customers and stakeholders for their active and open participation in the PR5 process. The actions and the voices of our stakeholders and our customers throughout the process provided ESB Networks with the clarity and evidence needed to build a transformative and effective PR5 business plan. Those same customer and stakeholder voices provided the CRU with the assurance it needed regarding customer's values and expectations, as it arrived at its final PR5 Determination.

## Community Engagement

As the distribution system evolves to support Ireland's transition to a low-carbon economy, ESB Networks will ensure that all our existing and future customers and stakeholders remain at the centre of our business. Listening to and engaging with communities is key to understanding their needs and preferences as to how we develop the network and deliver services.

We are proud to be able to collaborate with local communities on innovation projects in the Dingle Peninsula, Limerick City and the Aran Islands, as we explore the impact and capabilities of new low carbon and supporting technologies. In these projects, we are testing and trialling potential solutions to help us develop the decarbonised, decentralised and digitised electricity system of the future. We are also working with customers and communities to better understand the impact of and interaction with changing technologies and new, developing energy systems.

Both MaREI and Dingle Hub, two key stakeholders in this space, commented that we could include more examples of the impact and benefits that accrued from ESB Networks engagements on these projects. In particular they noted that;

“A key focus for the Dingle Hub has always been local capacity building and ESB Networks have worked closely with us to identify and support opportunities as they emerge. Examples of this in 2020 include support for the development of energy focused Animation Workshops for teenagers and the sponsorship of various energy related training for local tradespeople. The report may benefit from inclusion of these practical examples.” – Dingle Hub

“In 2019, local electricians were given the opportunity to tender for the installation of battery storage systems as part of the StoreNet project. They were trained in the installation of the batteries by the manufacturer and afterwards commended on the quality of the installations. What has now emerged from that is a new company focussed on the installation of Solar PV, batteries and EV chargers. This is an excellent case study in how local engagement and involvement in innovation projects can help to address the skills shortfall in a very practical way. We would welcome this being included in the report to demonstrate the benefit of skills transfer and community capacity building and the role that ESB Networks project can play in this.” - Dingle Hub

“ESB Networks has been a valuable partner, along with the Dingle Hub, North West Kerry Development (NEWKD) and MaREI, in Dingle Peninsula 2030. The collaboration has ensured

that the partners worked in and with the community and did not use it as a 'guinea pig' or a vehicle for a project. The multi-disciplinary approach and the merging of views, skills, experience and additional resources also helped each agency and participant to understand that it is involved in a partnership and the collective effort is aimed at stimulating the potential of each player, both individually and collectively and, most importantly, is responsive to the needs of the local community. The building of trusting and respectful relationships with partners who respect each other's input has been key to this collaboration. And the regular group meetings, along with the openness to sharing ideas and learning from each other, have helped to foster a sense that the solutions were co-created and not owned by any one stakeholder. As part of the engaged research aspect of the collaboration led by MaREI, ESB Networks helped to co-create a learning brief, *The Value of Collaboration*, outlining how the collaboration worked and the lessons learnt. We hope that this will provide useful learning within the partner organisations as well as for other communities, agencies and policy makers." - MaREI

MaREI further commented on the effectiveness of our dedicated local community engagement resource and how we should leverage community engagement expertise from learnings and experiences on the Dingle project.

"As part of the Dingle Electrification Project, ESB Networks has employed a skilled community engagement manager to provide hands-on support to the Ambassadors and trial participants, and by doing so has demonstrated the importance ESB Networks places on engaging with the local community in an open, inclusive and supportive manner. We believe the experience and learning gained from this position should be maximised internally so as to contribute to the continuing development of stakeholder and community engagement skills at all levels within the organisation, and to future engagement with local communities." - MaREI

## **Our Response**

We welcome the above comments, reflecting the importance placed by stakeholders and ESB Networks on active community engagement. The comments reflect the variety of initiatives undertaken and we appreciate the benefit of including as many examples as possible. Indeed, during 2020, we also established a Community Energy Liaison Panel to act as the focal point of our engagement with communities around the country in relation to how ESB Networks can support the connection of community-led renewable energy projects to the electricity distribution network. This community participation in support of Climate Action is critical to achieving our national targets.

## **Engagement with Suppliers in the National Smart Metering Programme**

A key supplier stakeholder, BGE, provided feedback (noting areas for improvement) on the 'ESB Networks Report on Stakeholder Engagement in 2020', relating to engagement on the National Smart Metering Programme (NSMP), which is addressed below. In an earlier consultation ('ESB Networks Stakeholder Engagement Strategy & Plan 2021'), we welcome the positive feedback and support BGE provided for the approach taken by the NSMP to industry/supplier engagement:

"It is positive to see that the Smart Metering Programme remains an area of engagement of its own, given its prominence in the 2030 agenda and the significant support given to it in PR5.

The engagements to date by industry participants in this programme have demonstrated the importance of stakeholder engagement not just to recognise the issues the programme has to address, but also allow the stakeholders to explore solutions and collaborate with ESNB to facilitate delivery by the programme of the required services in a timely and customer centric manner. With the continuing requirements on the delivery of the high-level design for the Programme, this stakeholder/ supplier engagement and close cooperation will become more critical to ensure agility and adaptability of the programme to react to the experience and feedback of customers (including suppliers like BGE)". - BGE

In general, BGE provided very positive feedback in relation to our engagement in 2020. For example, they noted:

"The 2020 Report highlights the development and improvement in stakeholder engagement by ESNB which has built on stakeholder feedback received and the lessons learned from 2019 including elements of the feedback from the CRU Network Stakeholders Engagement Evaluation (NSEE) Panel Close Out Report for 2019." - BGE

"We also recognise the efforts made by ESNB to continue the focus and support of stakeholder engagement activities across 2020 despite the impact felt by all from Covid-19. The communications to stakeholders on actions relating to the pandemic restrictions were helpful and informative, and improvements were noted to the provision of siteworks documentation based on stakeholder feedback." - BGE

"Equally, the materials provided by ESNB on supply suspension in 2020 were clear and comprehensive. We found the Innovation Webinar series to be informative and engaging and we welcome its continuation into 2021." – BGE

However, BGE noted areas for improvement in relation to engagement on the National Smart Metering Programme (NSMP).

"We believe that more needs to be done to achieve successful outcomes through the engagement with suppliers under the National Smart Metering Programme (NSMP)." - BGE

## **Our Response**

As a major national programme, the NSMP has an agreed governance framework and is overseen by a Steering Group (SSG), chaired by the CRU, which includes representatives from ESB Networks, the Department for Environment, Climate and Communications (DECC), Gas Networks Ireland, and representatives of electricity suppliers and the Sustainable Energy Authority of Ireland (SEAI).

Supplier engagement and collaboration on the programme is facilitated through key industry forums/working groups. They are the Industry Liaison Group (ILG), and the Communications & Engagement Working Group (CEWG) and are made up of representatives of electricity suppliers, CRU, DECC and SEAI. These working groups operate in addition to existing retail market governance forums. These groups meet each month to discuss progress and to align communications. There has been extensive engagement with industry throughout 2020 which have supported the smart meter deployment process and the go-live of smart services in February 2021. A total of 26 working groups were held in 2020:

- SSG – 6 meetings
- ILG - 14 meetings (held ILGs fortnightly in April & May 2020 during the first lockdown)
- CEWG - 12 meetings
- Hypercare status updates – Daily in March and April and 3 times per week in May

ESB Networks is also available to meet with individual industry participants and this is open to all suppliers, and a number of such meetings took place in 2020. We appreciate the commitment and engagement of our industry partners to the Programme in 2020 which was demonstrated by their active participation in and input to regular industry forums and workshops. We would like to address the specific BGE points in this response, as follows.

“Late release of Programme timeline information (e.g., ‘Plan on a Page’), Market design information of insufficient detail presented difficulties for BGE planning and ultimately, we believe this contributed to the delay to Phase 1 go-live”. - BGE

**Our Response:** ESB Networks made planning and market design documentation available that set out the scope of Phase 1 as a baseline in 2019 and as more information became available, updates were made to the documentation on a regular basis and shared with all industry participants. ESB Networks will continue to work with Suppliers to improve this for Phase 2 of the NSMP.

“There were transparency challenges throughout, for example receiving timely and clear responses to queries, a delay in setting up an industry log of queries to ensure transparency across the market, accurate minute taking, and undocumented bi-lateral meetings with selected market participants which limited transparency across the market”. - BGE

**Our Response:** The Programme’s governance framework provides for clear and open ways of working and ESB Networks collaborated with all industry participants in the delivery of the Programme’s key milestones. At Supplier request a query log was put in place and managed by RMDS which registered stakeholder queries/clarifications. The log was available to all electricity suppliers during the design phase. Query logs were in place during IPT and currently in Hypercare which have been welcomed by all participants.

ESBN/supplier meetings were available to all suppliers. Any update/clarification following one-to-one meetings that were relevant to all Suppliers were updated on the query log, which was then shared and made available to all participants.

“BGE change requests have not been completed which continues into the current Phase”. - BGE

**Our Response:** Using standard market process procedures, market change requests are administered by RMDS in conjunction with Suppliers and prioritised through the Industry Governance Group (IGG) chaired by the CRU. ESB Networks inputs to these processes along with other market participants, but it is ultimately for CRU to approve and prioritise market change requests. All approved and scheduled Market Change Requests (MCR’s) have been delivered to date.

“Limited/no involvement of the independent assurance body (Gemserv) within Smart Industry Meetings (ILG, Workshops, Hypercare etc.) has resulted in key learnings and input to future IPT events not being captured and actioned and key decisions being made to the detriment of the market (e.g., no end-to-end test)”. - BGE

**Our Response:** The agreed governance framework, mentioned earlier, sets out the roles and responsibilities of all stakeholders in the delivery of the NSMP. The framework does not currently include a role for the independent assurance body in the meetings listed by BGE. However, CRU has commissioned a lessons learned workshop following completion of Phase 1 and any recommendations on the future role of the independent assurance body will be incorporated into the governance framework if required.

“Lack of agreed Phase 2 scope and plan prior to proceeding with Phase 2 detailed design workshops (MCR workshops)”. - BGE



**Our Response:** In July 2020, following completion on the Phase 1 checkpoint review CRU published “CRU20075 Phase 1 Checkpoint Review Information” setting out scope for phase 2. ESB Networks is currently engaging with all industry stakeholders, including Suppliers, DECC and the CRU on the timelines for Phase 2 of the NSMP. Elements of the proposed plan have key dependencies which have to be confirmed. It is our view that those elements of the plan which are not subject to such dependencies may proceed and has engaged with Suppliers on that basis. CRU is currently reviewing feedback from ESB Networks and Suppliers on the scope of work and timeline for Phase 2.

“The impacts and benefits identified in the 2020 Report as relevant to the NSMP display a bias towards consumer engagement and does not mention the engagement challenges faced by suppliers, which are crucial in delivering the benefits of the smart meter programme to end consumers”. - BGE

**Our Response:** We agree that the 2020 Report had an emphasis on consumer engagement which was considered a significant programme risk. Despite delays in 2020 due to the Covid-19 pandemic, over 239,000 smart meters were installed by the end of 2020. Positive engagement with the general public was delivered via a co-ordinated approach developed in consultation with industry stakeholders including Suppliers and is reviewed and amended on a regular basis at the Communications and Engagement working group (CEWG).

Going forward we will include metrics and measures that also incorporate engagement with suppliers and other stakeholders.

“Equally, we ask ESBN to improve the suite of engagement metrics it has developed and demonstrated in the 2020 Report to capture a holistic and complete view of all stakeholder sentiment on engagement and not just focus on consumers, given the only supplier related metric is focused on the Supplier Suspension process. The NSSE Panel recommendations last year made particular reference that the metrics and measures used by ESBN should include a wider range of stakeholders, with suppliers being the example used”. - BGE

**Our Response:** We have endeavoured to widen the scope of our engagement metrics in the ‘ESB Networks Report on Engagement in 2020’. For example, we expanded the number of case studies to 18 in total to reflect the broad range our engagement activities, discussing impact/benefit for each case study. In a dedicated ‘Measures of Success’ section of the report, we outlined metrics relating to engagement on PR5, smart metering, safety, innovation, connecting renewables, electrification, customer experience, storm response and supplier initiatives. Also, in a tabulation of our consultations in 2020, we outlined metrics on stakeholder response levels in each case. We will continue to work on our metrics framework, for example, the NSMP may provide engagement metrics, such as;

- Engagement related to the update to the retail market systems facilitated supplier readiness for the introduction of smart services from suppliers.
- Engagement related to agreed messaging to support smart services go-live facilitated through the CEWG. As a result, all programme collateral was updated to support smart services go-live.

## Connecting Renewables

ESB Networks recognises the importance of the process for grid connection both for our stakeholders, our business and to enable delivery of climate action targets and in response continual improvements are being made to the rules and processes through collaboration with our stakeholders and collective action with the TSO (EirGrid) and the Commission for Regulation of Utilities (CRU).

This was also a specific recommendation raised in the [NSEE Panel Close-out Report 2019](#),

“An area of concern is the communication involved in the process for grid connection. In particular, the communication around the connection offer and the connection projects processes should be improved going forward. It appears to be some misalignment between ESBN and EirGrid in relation to progression of grid delivery works and the Panel expects this will be improved going forward.” - NSEE Panel

The improvements implemented in 2020 are detailed in our [‘Report on Stakeholder Engagement in 2020’](#) specifically in the case studies titled 'Connecting Renewables via the Enduring Connection Policy, LEAN Connections Project and Community - Led Renewable Energy Projects'. We have also worked closely with EirGrid to further align our organisational interfaces to improve the effectiveness and efficiency of the grid delivery programme. The improvements to the stakeholder engagement process have been welcomed. Specific stakeholder feedback includes;

“This is an extremely important area for our members, and we welcome the engagement with ESBN on the ECP-2 process to date and the enhanced engagement mechanisms that are being built into the process.” - WEI

“We are very supportive of the Lean Connections Project is an initiative and we look forward to engaging further during the wider rollout of that process.” - WEI

“The emphasis in stakeholder engagement should be on allowing developers to work with ESBN to engineer cost effective connections. As such, we suggest the inclusion of additional metrics and KPIs in areas such as early engagement meetings, response timelines to developer queries and improved connection processing timelines as a means to measure success in this area. Our recommendation for a customer engagement survey would also feed into this as a means of identifying what is working well, what needs to be improved and how this can be done.” - WEI

“Our members also recognise the value in the recently published Distribution System Security and Planning Standards and also the Demand and Generation Capacity Heatmaps. We have found the indications of available transformer capacity for new demand and generation customers at HV & MV distribution stations in the heatmaps helpful and suggest that there would also be value in including information on network congestion.” - DRAI

“We also note ...the production of the accessible Community-led Renewable Energy Projects Guidebook (and subsequent web page and ‘Empowering Community-led Renewable Energy Projects’ webinar in Q1 2021).” - MaREI

A number of specific related areas where it was felt engagement could have been improved were in relation to smarter connections, Generator Standard Charges, the FlexTech project and outage management.

Two areas that WEI has recently raised concerns with ESBN are progress in relation to the smarter connections project (distribution planning standards) and Generator Standard Charges (GSC). - WEI

“Progress and engagement on the FlexTech initiative has been extremely slow and disappointing for industry. The 2020 report does not discuss this and references the paper on Multiple Legal Entities for hybrid projects but does not provide any further detail on the programme.”- WEI

“since its launch in June 2019 our members have become increasingly concerned that the FlexTech programme has not progressed.” - DRAI

“In our view FlexTech needs to be prioritised and appropriately resourced within the ESB Networks.” - DRAI

“WEI recognises the difficulties in 2020 with Covid-19 and welcomes the emphasis on improving outage planning and reducing impacts on customers. We believe there is need for greater transparency and cooperation on outage planning and we look forward to engaging with ESNB on this matter. One suggestion we would have is if the Lean principles, that are being applied in the connection process, could also be applied to outage planning and management? This could be a specific project which seeks to introduce efficiencies and minimise the impacts of outages in terms of customer impacts.” - WEI

## **Our Response**

### Enduring Connection Policy

We recognise the importance of customer engagement throughout the ECP-2 process. We are tracking key metrics such as the number of phase 1 and phase 2 connection method meetings with customers. For example, there were 16 Phase 1 customer engagement meetings in Q4 2020. This early engagement resulted in 14 DSO projects which would have required significant and costly uprate works withdrawing from the process which allowed back filling by other projects into the ECP-2.1 batch to take place. This early customer engagement was positively received by industry.

We commenced the phase 2 engagement in April 2021 which will continue over the coming months. This engagement gives a customer an opportunity to discuss their proposed connection method and they have the option of optimising their MEC or withdrawing in the cases where significant works are required in return for 75% refund of their application fee.

The processing window for successful applicants is January to December each year as per the CRU ECP-2 policy decision. The connection processing timelines are determined by the nodal assignment with EirGrid so the timelines will vary depending on the order of when the project node is studied. ESNB Networks is committed to meeting the CRU timeline of having all connection offers issued under each ECP-2 batch by December in the year following application window opening. The response timelines from phase 2 customer engagement meetings to finalising of customer connection method will also be included as part of these KPIs.

The feedback received from the ECP-2 and Heat Map webinars held in July 2020 (with almost 70 participants in attendance) was positive and encouraging. Stakeholder comments regarding the Heat Maps included “very easy to use” and “useful tool”. The publication of the station transformer capacity information was widely welcomed, and further improvements to the functionality and presentation of the heat maps are underway in response to feedback received. Further information webinars/workshops will be provided in 2021 to support the Enduring Connection Policy.

### The Lean Connections Project

The Lean Connections programme aims to improve major project delivery timelines and costs and to introduce a “Lean” approach within ESNB Networks. It is focussed on shortening the time scales to connect customers. The cost of completing projects will be monitored and tracked but recognising that trends in cost only become apparent over a longer period. The delivery timelines for generator connections will be reported via the regulatory framework for incentive reporting, the format of which is currently being worked through e.g. level of detail and frequency. Initially, the programme will aim to provide timeline and cost certainty for project delivery.



The Lean Connections Project team has been meeting different key stakeholders as part of the review process and welcomes further engagement on how industry might help the review and implementation of leaner processes with the focus on the end user in driving out improvements to both timelines and costs.

The programme is due to be completed by the end of Quarter 1 2022 however the adoption of “Lean” and implementation of continuous improvements to the delivery of major projects will continue beyond that time. This review is for Major Renewable, Demand/Load and Infrastructure projects, but introducing “Lean” will also have benefits across other project delivery and customer activities over time.

### Smarter Connections

Under the Smarter HV and MV Customer Connections Project, ESB Networks consulted on a Non-Firm Access approach for distribution connected generators, which was approved by the CRU to be implemented for ECP-2.1 connection offers. The new approach permits the consideration of a non-firm connection, under certain conditions as published in the Non-Firm Access for Generators Guide for MV connection applications, which make up approximately 80% of generator applications to the distribution system. Under the ASM Project which is now underway, it is hoped to develop and introduce further, different and more active or variable approaches, applicable for generator connections under different conditions and at other voltage levels.

### Generator Standard Charges

A detailed review of the Generator Standard Charges had not been carried out since 2007 and this has led to the GSCs being out of line with cost appropriate ESB Networks expenditure on generator connections and an under-recovery of this expenditure from the generators. The CRU accepts that the existing GSCs were contributing to the under recovery of generation connection expenditure from generators, thereby resulting in a subsidy from Distribution Use of System (DUoS) network charges in Price Review 4 (PR4). The detailed review involved a bottom up approach to calculating the GSCs which also included two industry consultations and a number of independent advisor reviews.

### FlexTech

We believe we have provided adequate resources in our role as partner to the TSO-led FlexTech Integration Initiative. A wide programme of TSO/DSO co-operation has been agreed between EirGrid and ESB Networks. Both parties have committed to clear deliverables and incentives. This incorporates activities and proposals which were initiated as part of the FlexTech initiative. A proposed programme of work, prioritising activities identified in partnership with industry has been submitted to the CRU as the basis of 2021 activities, and this is being progressed in a timely manner, with the full commitment of ESB Networks and the TSO. In a number of instances, the activities identified within the FlexTech initiative has also been identified, independently, as necessary from a local distribution system management perspective, and are thus being progressed, resourced and led by the DSO, with the support and collaboration of the TSO. Stakeholders will be consulted and involved in this as the work progresses.

We recognise the criticality of addressing the full spectrum of technical, operational, commercial, regulatory and market challenges to facilitating the integration of renewables. As such, ESB Networks has established the Active System Management Project, to drive out an ambitious programme to address these needs, on the distribution system, in a holistic manner. Engagement like FlexTech, and DSO/TSO coordination are an important part of this.

### Outage Management

It is in everyone’s interest to minimise the length and frequency of outages by optimising the ESB Networks outage plan with that of its customers. Greater communication and transparency between the system operators and their customers in relation to outage planning has been identified as a priority

task based on feedback from both our customers and stakeholders. We work closely with EirGrid as a key stakeholder to coordinate outages and ensure security of supply to critical infrastructure is maintained.

Throughout 2020, ESB Networks undertook outage studies to align the DSO works with customer works to minimise loss of supply to customers and reduce ESB Networks resource requirements. Intensive engagement and coordination was undertaken with all stakeholders including network operators, network technicians, supervisors, outage planners, control centre operators, EirGrid and our HV customers. Although the effect of the delay and change of work practices caused by COVID-19 are still impacting both ESB Networks and our customers' work programmes, we have received very positive feedback from our stakeholders about the increased level of communication and cooperation provided through ESB Networks staff during 2020.

As per the Distribution code the DSO endeavours to give three days' notice of planned supply interruptions. Our aim and best practice is to go above and beyond this target, by identifying and aligning all planned works; highlighting outages in an advanced timeframe and communicating with all stakeholders. We use the Distribution Outage Programme (DOP) as the mechanism to achieve these improvements. Further to this we have taken on feedback and are implementing ongoing improvements:

- Continued engagement with our HV customers and process improvement
- Developing a process where wind farms can stay connected to the system when their associated transmission asset is on outage
- Creation of a SharePoint Dashboard for DOP statistics
- Publishing the DOP

Going forward we would like to work even more with our stakeholders and continue to improve via feedback through this process. The Distribution Outage Programming process is still evolving and growing. We are committed to making this process as transparent as possible over time and are also committed to our customers and dealing with them directly on specific outages as they arise.

## Section 2: Key Areas for Improvement

We value the feedback we have received to date which is enabling us to continually refine our engagement approach for the benefit of our customers and stakeholders.

During 2020, we consulted, listened and learned from our stakeholders. We published a report [‘How Stakeholder Feedback is Shaping our Engagement’](#) to describe how this stakeholder feedback is shaping our approach to our engagement strategy, plans and activities in 2020 and beyond. It describes how ESB Networks is interpreting stakeholders’ needs and our proposed approach to ensure continuous improvement of our engagement going forward. We describe stakeholder feedback under several key themes namely: the importance of early engagement; the grid connection offer process; working with the TSO (EirGrid); how we address feedback; pathways to engagement; engagement metrics & measuring performance; and community engagement. For each theme we outline the key recommendations and how they have informed our approach to stakeholder engagement during 2020.

ESB Networks also received valuable feedback in September 2020 from the evaluation process carried out by the Networks Stakeholder Engagement Evaluation (NSEE) Panel on its stakeholder engagement for the previous year. This feedback informed further developments in our engagement process during the remainder of 2020. Our response to this feedback is described in **Section 2 Feedback & Learnings** of our [‘Report on Stakeholder Engagement in 2020’](#).

Key areas for improvement, discussed in the above two reports, relate to measuring engagement performance; how stakeholder feedback is addressed in our business; and how ESB Networks and EirGrid work closely together as the two system operators. These aspects of engagement are further addressed below.

### Measuring Stakeholder Engagement

The importance of continuing to develop a range of metrics deemed most appropriate for measuring the effectiveness of our engagement activities was noted.

“The impact of stakeholder engagement should be quantified insofar as possible, taking into consideration aforementioned suggestions, e.g., in term of DUoS impacts for consumers or improvement in system and/or service outcomes. Also, a good range of metrics and measures of success should include a wide range of stakeholders, including, for example, suppliers”. - NSEE Panel

“We ask ESN to improve the suite of engagement metrics it has developed and demonstrated in the 2020 Report to capture a holistic and complete view of all stakeholder sentiment on engagement”. - BGE

Some stakeholders have recommended that we carry out an independent customer/stakeholder annual survey to better gauge the impact of our stakeholder engagement. It was suggested that this be reviewed through our stakeholder steering group and shared across the ESB Networks business. It was further suggested that ESB Networks share non-confidential elements of the survey with stakeholders for full transparency.

“We suggested in our response to the 2021 Stakeholder Engagement Plan that a customer engagement survey would also feed into this as a means of identifying what is working well, what needs to be improved and how this can be done”. - WEI

“We suggest that ESBN establish a similar wider annual survey process with ESBNs’ customers and stakeholders”. - BGE

## Our Response

ESB Networks understands the importance of having meaningful mechanisms to measure the effectiveness of our engagement activities. We have widened the scope of our engagement metrics in the [‘Report on Stakeholder Engagement for 2020’](#). For example, we expanded the number of case studies to 18 in total to reflect the broad range our engagement activities, discussing impact/benefit for each case study. In a dedicated ‘Measures of Success’ section of the report, we outlined metrics relating to engagement on PR5, smart metering, safety, innovation, connecting renewables, electrification, customer experience, storm response and supplier initiatives. Also, in a tabulation of our consultations in 2020, we outlined metrics on stakeholder response levels.

We will continue to apply both quantitative and qualitative engagement metrics to many specific engagement activities through targeted customer and stakeholder sentiment surveys and by gathering ratings, impressions and testimonials of our activities from our online and social media engagement platforms. For example, we measure the effectiveness of our engagement workshops and forums in providing a better understanding of the subjects being delivered. We continually measure customer and stakeholder sentiment relating to the National Smart Metering Programme. We measure the uptake and satisfaction of the use of our new online connections’ portal. The effectiveness of our engagement is also fundamentally measured through the delivery of our Price Review 5 (PR5) incentives, including the annual evaluation by the NSEE Panel.

We agree that independent surveys provide rich and informative feedback from customers and stakeholders. ESB Networks have used such mechanisms for our Smart Metering rollout, PR5 engagement and general Customer Experience initiatives. However, based on this feedback ESB Networks plan to carry out a more broad-based independent survey of key stakeholders’ views and expectations during 2021.

## Transparency of Feedback through Consultation Process

Our stakeholders have called for more insights into how ESB Networks takes on board stakeholders’ feedback. The importance of having a framework for how comments, feedback and input from stakeholder engagement are recorded, considered, and integrated into business activities or processes was highlighted.

“More insights in the process of how ESBN takes on board stakeholders’ feedback and addresses issues and decides whether to include/not to include suggestions in decisions would be welcomed. Also, the DSO needs to better reflect how ongoing engagement during the process of decision-making is taken on board and included in the outcomes of the decisions”. - NSEE Panel

“Regarding lessons learned, the Panel would welcome to see in the report how learnings from specific engagement activities feed into the overall strategy”. - NSEE Panel

Some stakeholders have noted improvements in how ESB Networks considers stakeholder feedback and reflects this feedback and learnings in its overall engagement approach.

“Improved transparency and precision on stakeholder input and feedback”. – BGE

“The 2020 Report highlights the development and improvement in stakeholder engagement by ESBN which has built on stakeholder feedback received and the lessons learned from 2019 including elements of the feedback from the CRU Network Stakeholders Engagement Evaluation (NSEE) Panel”. - BGE

However, they also note room for improvement in closing the feedback loop.

“There are examples however in 2020 where BGE believes that the closure of the feedback loop on consultation submissions can be improved. We welcome the issuing of feedback papers on ESBN consultations, but we believe that ESBN feedback is at too general a level for stakeholders to see that their input has been addressed and that it has (or has not) had an impact on the activity been undertaken by ESBN”. - BGE

“It is important to put forward a clear framework for how stakeholder engagement is listened to, taken account of, and actively used including demonstration of how the engagement was taken on board and the outcomes of this”. - WEI

“Clarity on influence of stakeholder engagement; suggests that while ESB Networks external delivery of its message has been enhanced, there is room for improvements in the incorporation of feedback. We would suggest a more structured approach to follow up communications where feedback has been solicited would be welcome”. - ISEA

## Our Response

Through our public consultation process, we seek to actively inform, engage, and hear from our customers and stakeholders on areas and activities across our business. During 2020, we have sought feedback through formal consultation processes on many key initiatives, including: our Innovation Strategy; Microgeneration Framework; MV Modular Substations and our Electrification of Heat and Transport strategy. Many of these consultations were supported by information webinars to facilitate better engagement and discussion of feedback.

We will continue to share our analysis of feedback received externally in our response papers and reports. In our [‘Report on Stakeholder Engagement for 2020’](#) we included a new metric to record the number of stakeholder feedback responses to each of our public consultations and noted our published response to feedback reports in our table of publications.

We are continually working to improve our consultation process with improved accessible documentation supported by information webinars, bi-lateral meetings, feedback surveys and published response papers. In addition to the consultation process, significant engagement occurs with stakeholders through ongoing meetings and discussion, where feedback and suggestions are considered. Currently our internal Stakeholder Engagement Steering Group made up of stakeholder leads from across the business provides overall direction to the stakeholder engagement feedback process within our business. We will be further developing the framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process for our stakeholders and also across ESB Networks.

## TSO/DSO Interfaces

The importance of the interface between ESB Networks and EirGrid, as the two system operators, has been noted by several stakeholders, with suggestions to highlight the nature of these interactions in future reports.

“The System Operators are key stakeholders to each other and interactions between them should be called out more clearly in future reports.” - NSEE Panel

“Further detail in future reports would be welcome on how enhanced engagement has delivered increased benefits in terms of project delivery, connections and renewable integration.” - WEI

“We would welcome more information in the plan for 2021 as to how closer cooperation will be facilitated and the proposed deliverables coming out of this.” - WEI

“It can be time inefficient to move between those organisations and usually multiple interactions are required”. - ISEA

“As we move towards achievement of the 2030 targets, higher levels of renewable energy generation on the system are expected to increase constraints and also require new connections to the distribution system. We therefore recognise the need for greater coordination between DSO and TSO.” - DRAI

### Our Response

ESB Networks understands the critical importance of a very close and effective working relationship with EirGrid as we work together to continue to plan, develop and manage an electricity network which fully supports the climate action plan and the needs of Irish customers and stakeholders. We work very closely and actively with our counterparts in EirGrid at an operational level on a day-to-day basis. The relationship is driven from the top at executive leadership level with regular and ongoing interactions, while both organisations meet on a quarterly basis at a senior level.

During 2020 both organisations worked closely together to further develop and enhance a formal structure of committees and subgroups managing a wide range of interfaces on technical and operational matters, with a focus on process improvement, operational coordination, joint work programming and improved delivery outcomes for customers and stakeholders. This included improving the alignment between both organisations through an enhanced structure of committees and subgroups dealing with Operational Services, Network Delivery, Maintenance Policies & Standards, Procurement Strategy, TSO/DSO Interface, Health & Safety and External Engagement.

In response to the COVID-19 pandemic, ESB Networks has coordinated very closely with EirGrid, with interactions on a daily basis, to ensure continued supply for critical infrastructure (e.g., HSE hospitals and testing facilities), minimising outage impact and continuing to develop and manage the network in a safe and reliable manner.

In recent years, the companies have successfully worked very closely together to facilitate increasing levels of renewable generation on the system and continuing to meet the challenges of the national Climate Action plan.



## Conclusion

We would like to thank all our customers and stakeholders for their continued engagement with ESB Networks and for taking the time to provide us with valuable feedback on our approach to engagement, particularly given the challenges of the COVID-19 pandemic. This feedback is a key mechanism feeding into our 'Plan-Act-Report-Review-Improve' cycle of continuous improvement outlined in our [Stakeholder Engagement Framework](#). By continuing to engage directly with our customers and stakeholders on an ongoing basis (through bi-lateral meetings, workshops and other forums) and by conducting regular formal consultation processes (as outlined in this report), we will ensure clear mutual understanding of material issues and work to continue to build positive experiences and outcomes for all our customers and stakeholders. In all engagement approaches, we will continue to ensure that the principles of 'inclusivity, materiality, responsiveness and impact' (as outlined in our [Stakeholder Engagement Framework](#)) guide our engagement activities.

We welcome the many positive comments on our engagement performance in 2020 and our engagement strategy and plan for 2021. This positive feedback reflects our continued strong focus on meaningful engagement, the broad scope of our engagement activities and our ongoing efforts to strengthen our engagement process. While these positive sentiments provide welcome encouragement, we also appreciate the areas for improvement which are highlighted by our customers and stakeholders, providing opportunities to further strengthen our overall strategy and performance.

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

## APPENDIX:

### Tabulated Respondent Feedback & Our Response



## Comments on 2020 Stakeholder Engagement Report

Respondent	High-level comments	ESB Networks Comment/Response
<p><b>Chambers Ireland</b></p>	<p>Overall, we welcome the contents of the reports. Some feedback from Chambers Ireland and the network for any future report would be;</p> <ul style="list-style-type: none"> <li>• Putting stakeholders in a Power/Interest matrix may help ESB Networks internally in how they engage with Stakeholders. It would help identify the stakeholders that you need to either               <ol style="list-style-type: none"> <li>1. Manage closely</li> <li>2. Satisfy</li> <li>3. Inform</li> <li>4. Monitor</li> </ol> </li> <li>• Customer engagement is a term used a lot in the document. These customers come together to form communities around the country. It would be worthwhile to demonstrate how will be engaging these communities in your strategy going forward.</li> <li>• The webinar series is a welcome tool for engaging stakeholders, but the topics may only lead to you engaging with interested stakeholders. Do you need a mechanism for engaging with stakeholders who currently do not have an interest in the ESB Networks strategy, but may in the future? An example of these stakeholders would be businesses who are low energy users.</li> </ul>	<p>We agree that stakeholder mapping is very helpful tool for managing our stakeholder engagement. Each business area across ESB Networks prepares their individual stakeholder plans and part of that planning is the mapping of stakeholders and the identification of the levels of engagement deemed appropriate for each stakeholder group. Refer <a href="#">ESB Networks Strategic Stakeholder Engagement Framework</a>.</p> <p>We agree that our strategy for community engagement should be demonstrated more clearly in our future reports. This is particularly important as we transition to a low carbon society where the active energy citizen and communities can participate and play a key role. We are currently developing an engagement plan for engagement with communities on the Active System Management project and we will be launching our communications consulting framework in Q3 2021.</p> <p>Reflecting the importance of communities, during 2020 we established a Liaison Panel to act as a point of contact for engagement with community-led renewable energy projects.</p>
<p><b>UCD Energy Institute</b></p>	<p>UCD Energy Institute welcomes the publication of the ESB Networks Stakeholder Engagement Report 2020 and the depth of information it provides in relation to interaction with stakeholders.</p> <p>2020 provided significant challenges arising from the Covid19 pandemic. The report outlines the changes required of ESBN in terms of business practices and engagement and we commend the role ESBN has played in ensuring a secure electricity supply, in particular to</p>	<p>ESB Networks continued a strong collaborative relationship with UCD Energy Institute throughout 2020. A lot of research was carried out through ESIPP and we look forward to formulating plans together in 2021 for the NexSys Research Programme that is due to commence in January 2022.</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>essential services. Changes to engagement practices such as the introduction of the Innovation Webinar Series and the strategic webinar series “Powering the Change” were also extremely positive. The establishment of the Innovation Stakeholder Panel provides a good opportunity for discussion of projects and activities. The introduction of a Customer and Society Panel is also very welcome as it essential that the energy user is at the centre of the energy system. We welcome the new Stakeholder Newsletter which provides interesting updates and we look forward to seeing the next edition.</p> <p>The listing of consultations and publications, including the forward-looking list for consultations is a welcome addition to the website. This allows stakeholders to plan engagement activities in a more meaningful way. The tables at the end of the document are particularly useful in terms of identifying the ongoing engagement activities and audiences for ESB Networks. The Case Studies provide useful examples highlighting the benefits and impact of engagement in more detail, with the tables detailing the wider range of activities providing a better overview of the important role ESB Networks play in the wider energy industry.</p> <p>One area we think is lacking in detail is the engagement with academic institutions. While this is captured in terms of the Innovation Stakeholder Panel and meetings, the role of ESB Networks in supporting and guiding research activities is not well highlighted.</p>	<p>We note and welcome these positive comments and look forward to further meaningful engagement throughout 2021.</p> <p>For an overview of our engagement with academic institutions, please refer Section 2.2, ‘Collaboration and Engagement with Academia and Research Organisations’ of our Innovation Consultation, <a href="#">‘Innovating to Transform the Electricity Network’</a>.</p> <p>We will endeavour to expand our future engagement plans to capture this detail to better show how ESB Networks can continue to support and guide R&amp;D.</p>
<p><b>Bord Gais Energy (BGE)</b></p>	<p>The 2020 Report highlights the development and improvement in stakeholder engagement by ESNB which has built on stakeholder feedback received and the lessons learned from 2019 including elements of the feedback from the CRU Network Stakeholders Engagement Evaluation (NSEE) Panel Close Out Report for 2019. We also recognise the efforts made by ESNB to continue the focus and support of stakeholder engagement activities across 2020 despite the impact felt by all from Covid-19. The communications to stakeholders on actions relating to the pandemic restrictions were helpful and</p>	<p>ESB Networks welcome these positive comments and look forward to continuing to build and improve our stakeholder engagement by listening to and acting upon our stakeholder feedback.</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>informative, and improvements were noted to the provision of siteworks documentation based on stakeholder feedback. Equally, the materials provided by ESNB on supply suspension in 2020 were clear and comprehensive. We found the Innovation Webinar series to be informative and engaging and we welcome its continuation into 2021.</p> <p><b>Engagement with suppliers on the National Smart Metering Programme.</b>  There remains however the onus on ESNB to ensure that all engagement as planned is focused on the needs of the stakeholders and offers a positive impact or outcome for all stakeholders. We believe that more needs to be done to achieve successful outcomes through the engagement with suppliers under the National Smart Metering Programme (NSMP).</p> <p><b>Improved transparency and precision on stakeholder input and feedback.</b>  There are examples however in 2020 where BGE believes that the closure of the feedback loop on consultation submissions can be improved. We welcome the issuing of feedback papers on ESNB consultations but we believe that ESNB feedback is at too general a level for stakeholders to see that their input has been addressed and that it has (or has not) had an impact on the activity been undertaken by ESNB. We consider the Microgeneration Framework Consultation Response to be a good example of the issue. We ask for more transparency and specificity in feedback to stakeholder submissions. There is much practice in this by the Regulatory Authorities in consultation decisions where the submitter and their input is acknowledged with a reasoned explanation as to whether the point has been incorporated/ rejected in the final decision. We ask ESNB to consider how this lens can be applied to feedback on stakeholder submissions going forward.</p> <p>BGE believes this issue of transparency applies also to the guidance and feedback to ESNB from the additional stakeholder engagement panels as proposed by ESNB. The inputs through the engagement</p>	<p>We appreciate BGE's feedback, noting areas for improvement, relating to engagement on the National Smart Metering Programme (NSMP). A full response to the points raised are detailed in Section 1 - <a href="#">Engagement with Suppliers in the National Smart Metering Programme</a></p> <p>We are continually working to improve our consultation process with improved accessible documentation supported by information webinars and feedback surveys and published response papers. Currently our internal Stakeholder Engagement Steering Group made up of stakeholder leads from across the business provides overall direction to the stakeholder engagement feedback process within our business. We will be further developing the framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process for our stakeholders and also across ESB Networks.</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>panel process should be published across the stakeholder community (perhaps on the updated stakeholder engagement portal) along with the reasoned decisions by ESNB if the input was impactful to their activities. This method will allow stakeholders to see the considerations given to the input by the panels and ESNB's strategic reasons behind the impact that the input has made.</p> <p><b>Improvements to the Stakeholder portal on the ESNB website.</b> We support the recognition by ESNB that improvements needed to the ESNB website require project resource and investment. While we appreciate the changes made to the website in the last year, we see these as incremental (but necessary) improvements. We believe that the Stakeholder Engagement portal (including consultations) needs to be structurally reconfigured to be a resource for stakeholder services, communications and information. We ask ESNB to inform its improvements to the website based on a wide-ranging review of useful websites and benchmarking against other stakeholder engagement sites, such as those of the CRU or the SEM Committee.</p> <p><b>Metrics:</b> We ask ESNB to improve the suite of engagement metrics it has developed and demonstrated in the 2020 Report to capture a holistic and complete view of all stakeholder sentiment on engagement and not just focus on consumers, given the only supplier related metric is focused on the Supplier Suspension process.</p>	<p>We agree that there is merit in sharing key inputs/outputs from these panel meetings across the wider stakeholder community and we will endeavour to make relevant material/documentation available.</p> <p>We acknowledge the need to improve accessibility of stakeholder information on our website and we are committed to continually reviewing and updating information on our dedicated Stakeholder Pages. ESB Networks new website is due to become live in June 2021. It will include an improved publications section. In the meantime, you can register for email notifications relating to consultations/publications at <a href="mailto:stakeholder@esbnetworks.ie">stakeholder@esbnetworks.ie</a></p> <p>ESB Networks recognises the importance of having meaningful mechanisms to measure the effectiveness of our engagement activities. We will continue to apply both quantitative and qualitative engagement metrics to many specific engagement activities through targeted customer and stakeholder sentiment surveys and by gathering ratings, impressions and testimonials of our activities from our online and social media engagement platforms. The effectiveness of our engagement is also fundamentally measured through the delivery of our Price Review 5 (PR5) incentives, including the annual evaluation by the NSEE Panel.</p>



Respondent	High-level comments	ESB Networks Comment/Response
	<p>system are expected to increase constraints and also require new connections the distribution system. We therefore recognise the need for greater coordination between DSO and TSO. Specifically, our members emphasise the need for interaction between the DSO's flexibility services and DS3 System Services teams (or their future successors). In particular, we have concerns for the impact of fast DS3 services on the operation and planning of distribution system, and would like to see the system operators develop a clear, collective approach that would enable industry to design and develop the system services that are needed to support the transition to a low carbon system.</p>	<p>managing a wide range of interfaces on technical and operational matters, with a focus on process improvement, operational coordination, joint work programming and improved delivery outcomes for customers and stakeholders. This included improving the alignment between both organisations through an enhanced structure of committees and subgroups dealing with Operational Services, Network Delivery, Maintenance Policies &amp; Standards, Procurement Strategy, TSO/DSO Interface, Health &amp; Safety and External Engagement. Please refer to Section 2. Key Areas for Improvement and our comments relating to <a href="#">TSO/DSO Interfaces</a></p>
<p><b>Dingle Hub</b></p>	<p>Our overall feedback is to commend ESB Networks on the wide variety of channels developed and delivered to enable information sharing and genuine engagement that is of value to both stakeholders and ESB Networks alike. Despite the challenges of the pandemic, it is clear that the journey to meaningful engagement has continued and accelerated through 2020. Of particular note in 2020 were the Strategic and Innovation webinar series, the establishment of the Innovation Stakeholder Panel and the Customer and Society Panel and the development of the capacity maps. The webinar series enabled a new level of engagement and information sharing among a much broader reach of stakeholders. We hope that the online provision of information in this manner will continue beyond the necessity driven by the current pandemic restrictions. From a consumer perspective, the Keeping the Nation Humming campaign was very visible and useful to effectively communicate the role of ESB Networks.</p> <p>In Dingle we have benefited from a very high level of engagement through the dedicated Community Engagement Manager resource. A key focus for the Dingle Hub has always been local capacity</p>	<p>We note and welcome these positive comments and recognise the importance and contribution that our webinar series and other similar engagement initiatives have provided our stakeholders, allowing early engagement and feedback opportunities that feed into the development of our strategy, plans and policies. We are constantly exploring new means and tools for engagement and we will work with our stakeholders to find innovative ways of keeping us all connected through these difficult and uncertain times.</p>



Respondent	High-level comments	ESB Networks Comment/Response
	<p>building and ESB Networks have worked closely with us to identify and support opportunities as they emerge. Examples of this in 2020 include support for the development of energy focused Animation Workshops for teenagers and the sponsorship of various energy related training for local tradespeople.</p> <p>ESB Networks has a role to play in ensuring that the skills and knowledge that will be required for the installation of future technologies is embedded within the training system - particularly in ensuring that installers are aware of the importance of installing active-ready systems. Local engagement and involvement in innovation projects can help to address the skills shortfall in a very practical way. We would welcome this being included in the report to demonstrate the benefit of skills transfer and community capacity building and the role that ESB Networks project can play in this.</p>	<p>We welcome these comments, reflecting the importance placed by stakeholders and ESB Networks on active community engagement. The comments reflect the variety of initiatives undertaken and we appreciate the benefit of including as many examples as possible.</p>
<p><b>MaREI, SFI Centre for Energy, Climate and Marine</b></p>	<p>We have read your report with interest and want to congratulate you on the extent and detail in the report which highlights the breadth of stakeholder engagement activities underway. In particular we note the reference to some of the learnings from the Dingle Electrification Project and the wider Dingle Peninsula 2030 collaboration. We also note the introduction of the "Powering the Change" interactive webinar series targeting a wide range of stakeholders, and the production of the accessible Community-led Renewable Energy Projects Guidebook (and subsequent web page and 'Empowering Community-led Renewable Energy Projects' webinar in Q1 2021).</p> <p>Following up on our previous input into ESB Networks Consultations and our feedback on same we would encourage the inclusion of the following two points:</p> <p><b>1. Building internal capacity within ESB Networks in stakeholder and engagement</b></p>	<p>We welcome these positive and supportive comments.</p> <p>These comments reflect the variety of initiatives undertaken and we appreciate the benefit of including as many examples as possible reflecting the importance placed by stakeholders and ESB Networks on active community engagement.</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p><b>2. Actively collaborating with community-based stakeholders</b></p>	
<p><b>Wind Energy Ireland (WEI)</b></p>	<p>Welcome and thank ESN for the many positive steps and initiatives undertaken in 2020 in relation to stakeholder engagement in areas such as PR5, where a collaborative approach with industry delivered a successful PR5 outcome, as well as ongoing engagement in relation to ECP-2, and the establishment of the Innovation Stakeholder Panel, which WEI is a member of. It is useful to see feedback from the NSEE panel included in the report and addressed and we look forward to seeing how the recommendations provided by the panel continue to flow into ESN's stakeholder engagement activities.</p> <p>Welcome the engagement with ESN on the ECP-2 process to date and the enhanced engagement mechanisms that are being built into the process. For future stakeholder engagement reports we suggest the inclusion of additional metrics and KPIs in areas such as early engagement meetings, response timelines to developer queries and improved connection processing timelines as a means to measure success in this area.</p> <p>We suggested in our response to the 2021 Stakeholder Engagement Plan that a customer engagement survey would also feed into this as a means of identifying what is working well, what needs to be improved and how this can be done.</p> <p>We are very supportive of the Lean Connections Project initiative and we welcome the engagement with industry so far in the process.</p>	<p>ESB Networks welcome these positive comments and look forward to continuing to build and improve our stakeholder engagement by listening to and acting upon our stakeholder feedback.</p> <p>We recognise the importance of customer engagement throughout the ECP-2 process. We are tracking key metrics such as the number of phase 1 and phase 2 connection method meetings with customers. For example, there were 16 Phase 1 customer engagement meetings in Q4 2020. The response timelines from phase 2 customer engagement meetings to finalising of customer connection method will also be included as part of these KPIs.</p> <p>We appreciate these positive suggestions and we agree that independent surveys provide rich and informative feedback from customers and stakeholders. ESB Networks have used such mechanisms for our Smart Metering rollout, PR5 engagement and general Customer Experience initiatives. However, based on this feedback ESB Networks plan to carry out a more broad-based independent survey of key stakeholders' views and expectations in Q4 2021. Details to be provided by Q3 2021.</p> <p>Please refer to Section 1 - <a href="#">Connecting Renewables</a></p>



Respondent	High-level comments	ESB Networks Comment/Response
	<p>An area where we feel engagement needs to be improved is in relation to the smarter connections project (distribution planning standards).</p> <p><b>FlexTech</b> Progress and engagement on the FlexTech initiative has been extremely slow and disappointing for industry. The 2020 report does not discuss this and references the paper on Multiple Legal Entities for hybrid projects but does not provide any further detail on the programme.</p> <p><b>Outage Management</b> WEI recognises the difficulties in 2020 with Covid-19 and welcomes the emphasis on improving outage planning and reducing impacts on customers. We believe there is need for greater transparency and cooperation on outage planning and we look forward to engaging with ESN on this matter. One suggestion we would have is if the Lean principles, that are being applied in the connection process, could also be applied to outage planning and management? This could be a specific project which seeks to introduce efficiencies and minimise the impacts of outages in terms of customer impacts.</p> <p><b>Engagement with EirGrid</b> We welcome the response to the NSEE panel's recommendation in relation to enhanced cooperation and transparency regarding ESN's interactions with EirGrid. This is an extremely important area in terms of delivering the grid infrastructure, renewable connections and system services needed to deliver our 2030 targets. Further detail in future reports would be welcome on how enhanced engagement has delivered increased benefits in terms of project delivery, connections and renewable integration.</p> <p><b>Tables in the Report</b> We believe the Tables in Section 5 of the report are useful but could be expanded to track planned versus actual engagements in the year. For instance, it is very useful for industry to have visibility on ESN's planned consultations, publications and fora/working groups but a useful exercise to measure success at the end of the year would be to track actual engagements against activities and timelines planned at the start of the year.</p>	<p>for our response on Lean Connections and Smarter Connections.</p> <p>Please refer to Section 1 - <a href="#">Connecting Renewables</a> for our response on FlexTech.</p> <p>Please refer to Section 1 - <a href="#">Connecting Renewables</a> for our response on outage management</p> <p>Please refer to Section 2 - Key Areas for Improvement - <a href="#">TSO/DSO Interfaces</a> for our response on Engagement with EirGrid.</p> <p>We agree with this suggestion and are aiming to update our tables throughout the year. We will incorporate this suggestion into our next report.</p>

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<p><b>Bord Na Mona</b></p>	<p>The ESB Networks Stakeholder Engagement Report shows an exemplary level of engagement across various stakeholders – across a diverse range of projects and processes - using a multitude of methods. It presents a fantastic body of work.</p> <p>The area where we think the report could improve, within Section 4 ‘Measures of Success’, would be to include tracked series findings showing the positive disposition towards any ‘green’ initiative campaign, over a number of measurement cycles. Or, perhaps, at a higher level, to present more insight, tracking people’s attitudes/changing consumer sentiment, as they move, incrementally &amp; positively, towards a ‘Zero Carbon’ mindset.</p> <p>Of particular interest would be tracked findings relating to The Active System Management (ASM) project, given that its focus is on the innovative transformation of how ESB Network will manage and operate the electricity distribution system going forward, managing all of its constituent parts. This project of course is very important towards the zero-carbon goal, focusing on enabling distribution-connected renewables, communities and demand response &amp; storage providers, so as to actively participate in the electricity system – a notably wide range of stakeholders.</p>	<p>We appreciate these positive comments and suggestions and we agree that independent surveys provide rich and informative feedback from customers and stakeholders. ESB Networks have used such mechanisms for our Smart Metering rollout, PR5 engagement and general Customer Experience initiatives.</p> <p>Based on stakeholder feedback ESB Networks plan to carry out a more broad-based independent survey of key stakeholders’ views and expectations in Q4 2021. Details to be provided by Q3 2021.</p> <p>Our Active System Management project will be launching its communications consulting framework in Q3 2021, this will include an overarching project outline and schedule. We encourage all stakeholders to register their interest in the ASM project by emailing <a href="mailto:engagement@esbnetworks.ie">engagement@esbnetworks.ie</a>. Over the course of this project we will be actively engaging with stakeholders via a range of engagement (e.g. focus groups, round table discussions, request to respond to publications) to help us shape the project.</p>

## Comments on 2021 Engagement Strategy & Plan

Respondent	High-level comments	ESB Networks Comment/Response
<p><b>Chambers Ireland</b></p>	<p>We feel the strategy of engagement presents a very structured and systematic approach to engagement activity overall.</p> <p>The specific areas of engagement outlined provide opportunity for the broad sectors of our membership to engage.</p> <p>We welcome the creation of a Stakeholder Engagement Team chaired by the Managing Director.</p> <p>We are happy to facilitate the meetings and workshops which may be required to help facilitate feedback for electricity users.</p> <p>We look forward to engaging as part of the <b>Customer &amp; Society panel</b>. It will provide an opportunity for us to provide feedback, guidance, and an independent perspective on behalf of our members.</p>	<p>We note and welcome these positive comments and will continue to enhance our reporting and transparency and look forward to further meaningful engagement throughout 2021.</p> <p>We will continue to strengthen our Stakeholder Engagement Steering Group with business leads from across the specified areas of engagement focus for 2021 and beyond.</p> <p>The first meeting of the Customer &amp; Society panel is scheduled for end of April 2021.</p>
<p><b>UCD Energy Institute</b></p>	<p>There is a wide range of stakeholders with which ESB Networks needs to engage, and the draft Strategy and Plan highlights the extent of this.</p> <p>We welcome the increased focus on stakeholder engagement and have seen a significant improvement in our own engagement with the organisation in recent years.</p> <p>UCD Energy Institute has a strong relationship with the Innovation team in ESB Networks. We value the role ESB Networks play in providing insights and expertise to our own research and innovation activities. We welcome the establishment of the Innovation Stakeholder Panel and look forward to contributing to this.</p> <p>The ESB Networks Stakeholder Engagement Strategy and Plan 2021 provides a comprehensive and accessible overview of the relevant stakeholders and planned engagement activities for 2021.</p> <p>The Customer &amp; Society Panel to be set up in 2021 is an interesting and novel addition to the engagement which provides an excellent</p>	<p>We note and welcome these positive comments look forward to continuing our strong engagement and collaboration with UCD Energy Institute, through bilateral meetings, round tables, webinars and our Innovation Stakeholder Panel.</p>

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	<p>opportunity to identify new trends and technologies which may be coming down the line.</p> <p>UCD Energy Institute has had good engagement with ESB Networks throughout 2020 in relation to ongoing and future research activities. Many of these research activities will be of longer duration than the time of this stakeholder engagement plan, however engagements underway now will deliver results in future years towards longer term objective such as 2030 and 2050 targets.</p> <p>We welcome the <b>listing of planned engagements outlined in the document (including consultations, publications and pathways to engagement</b> (ESB Networks hosted stakeholder meetings and events) for 2021) as this helps provide clarity on the areas for potential interaction in the coming year. Publication of these on the website will be beneficial to all to that they can be accessed by all and kept up to date.</p>	<p>ESB Networks’ strategy for 2020 to 2030 is scheduled to be published in Q2 2021. It is framed by the Climate Action Plan and is driven by ESB Networks’ central role in leading the transition to a secure and affordable low-carbon future using clean electricity to drive carbon in the form of fossil fuels out of heat, transport and the economy. Regular updates on progress against the strategy will be provided through our stakeholder engagement listings.</p> <p>We propose to update these listings on a regular basis.</p>
<p><b>Bord Gais Energy (BGE)</b></p>	<p><b>General approach/strategy:</b> BGE supports the proactive and strategic engagement by ESBN with all stakeholders against a framework that follows industry practice and standards.</p> <p><b>Stakeholder Survey:</b> BGE believes that there is an opportunity in the 2021 Plan to obtain rich and informative feedback from stakeholders and customers on their overall impression of engagement with ESBN. Established market practice within Gas Networks Ireland (“GNI”) as the Gas SO, is to use independent, external consultants to engage with a cross-section of customers (that includes suppliers) and obtain feedback to improve the service offered by GNI. The external consultants hold detailed annual experience interviews with customers/ suppliers across all aspects of engagement with the utility. We suggest that ESBN establish a similar wider annual survey process with ESBNs’ customers and stakeholders to capture their experiences of ESBN across focused workstreams and business-as-usual (BAU) operations. The <b>annual focused interview</b></p>	<p>We appreciate these positive suggestions and we agree that independent surveys provide rich and informative feedback from customers and stakeholders. ESB Networks have used such mechanisms for our Smart Metering rollout, PR5 engagement and general Customer Experience initiatives. However, based on this feedback ESB Networks plan to carry out a more broad-based independent survey of key stakeholders’ views and expectations in Q4 2021. Details to be provided by Q3 2021.</p> <p>We can also confirm that plans are already in place to complete a survey by an independent body in 2021 to ascertain views on the standard of our retail market services’ operation and to identify potential areas for improvement. The makeup of this survey will also</p>

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	<p><b>by an independent third party</b> should capture the voice of the customer and stakeholder on a wide range of their experiences of engagement with ESBN. The resultant report should contain a balanced analysis of the interviews, rich in detail on successes as well as improvement opportunities for ESBN.</p> <p>The report should be reviewed by ESBNs' Stakeholder Engagement Steering Group and then shared across the ESBN Stakeholder Engagement community. We suggest that ESBN should share non-confidential versions of the reports with stakeholders for transparency.</p> <p>BGE further requests the application of this annual independent survey process through focused customer interviews by a third party to the Retail Market Design Service (RMDS) within ESBN. While an annual survey by RMDS is currently carried out, an independent survey of RMDS customers and stakeholders (again including suppliers like BGE) should, in our view, give a detailed, balanced analysis of the RMDS customer experience – separate to that of the ESBN experience - to aid stakeholder engagement.</p> <p><b>Consultations Process:</b>  BGE supports improvements in the standardisation of stakeholder engagement by ESBN via consultations. The consultation notifications and papers give clarity to stakeholders on the input being sought and the route for response. We ask ESBN to ensure that they follow the good practice process loop for <b>consultations</b> which includes:</p> <ul style="list-style-type: none"> <li>• a recognition of the stakeholders' inputs, and general feedback as to how the input provided has impacted (or not) on ESBN's decisions, and</li> <li>• a grouped publication of the consultation, responses and decisions in an easily accessed section of ESBN's website</li> </ul> <p><b>Stakeholder Feedback:</b>  BGE considers that feedback by ESBN as to how stakeholder input from consultations has fed into decisions or next steps is a strong element of demonstrating the use of all stakeholder feedback in decision-making</p>	<p>allow a ring-fenced activity such as RMDS to be considered and evaluated as a discrete function.</p> <p>We are continually working to improve our consultation process with improved accessible documentation supported by information webinars and feedback surveys.</p> <p>We are publishing response papers as a mechanism to share this feedback and to show how we are taking on board suggestions and recommendations. Currently our internal Stakeholder Engagement Steering Group made up of stakeholder leads from across the business provides overall direction to the stakeholder engagement feedback process. We will be developing a framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process across ESB Networks.</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>by ESNB. BGE welcomes more insights into the process of how ESNB takes on board stakeholders' feedback and addresses issues and decides whether to include suggestions in decisions as recommended in the NSEE Panel Close Out Report by the CRU in September 2020.</p> <p><b>Website:</b> BGE welcomes the companywide project underway to improve aspects of the ESNB website, a noted item for improvement by the NSEE Panel report. We suggest the project scope includes the grouped publication of consultation documents as outlined above. We further suggest the scope also contains an option for users to register on the website for email notifications of consultation-related publications similar to the service by the CRU.</p> <p><b>Metrics:</b> BGE asks ESNB to give continued focus to the use of specific metrics across the activities identified in the Plan 2021. We ask for a set of enduring metrics to show how achievements within the annual plan(s) are contributing to the delivery of the 2030 requirements and so delivering value to stakeholders in a cost-effective manner. BGE suggests the use of metrics showing the level of value being delivered to stakeholders such as in terms of DUoS impacts for consumers or improvement in system and/or service outcomes. The improvement in the use of specific metrics was identified in the NSEE Panel Close Out Report<sup>10</sup>. BGE is keen to ensure that ESNB is adequately rewarded for good performance. The evidence of good performance should be by means of a set of objective metrics that reduces the potential for reporting subjectivity.</p> <p>The detail provided in the Plan 2021 on the consultations, publications, and pathways to engagement expected across the year is welcome, especially as each sets out the objectives, mechanisms and timings for the identified audiences. This helps stakeholders and customers to plan</p>	<p>We have implemented several improvements to our website including: a new section specifically for Stakeholder and Public Engagement (within this section we share details of our stakeholder engagement opportunities and activities, as well as information on our public consultations). ESNB Networks new website is due to become live in June 2021. It will include an improved publications section. In the meantime, you can register for email notifications relating to consultations/publications at <a href="mailto:stakeholder@esnbnetworks.ie">stakeholder@esnbnetworks.ie</a></p> <p>ESB Networks recognises the importance of having meaningful mechanisms to measure the effectiveness of our engagement activities. We will continue to apply both quantitative and qualitative engagement metrics to many specific engagement activities through targeted customer and stakeholder sentiment surveys and by gathering ratings, impressions and testimonials of our activities from our online and social media engagement platforms. The effectiveness of our engagement is also fundamentally measured through the delivery of our Price Review 5 (PR5) incentives, including the annual evaluation by the NSEE Panel.</p>



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	<p>their own actions for efficient engagement on the topics of relevance for this coming year.</p> <p><b>Long term vision:</b> We ask ESN to provide stakeholders with a high-level vision and schedule of the network changes expected by the DSO to 2030. The longer-term vision will give context to the Plan 2021 within the change requirements for 2030, and help stakeholders review the changes expected to the network in the coming decade and the possible implications for them and the end-consumer.</p>	<p>ESB Networks' strategy for 2020 to 2030 is scheduled to be published in Q2 2021. It is framed by the Climate Action Plan and is driven by ESB Networks' central role in leading the transition to a secure and affordable low-carbon future using clean electricity to drive carbon in the form of fossil fuels out of heat, transport and the economy. Regular updates on progress against the strategy will be provided through our stakeholder engagement listings</p>
<p><b>Demand Response Aggregators of Ireland (DRAI)</b></p>	<p>We very much welcome and support the proposed collaborative approach to customer engagement detailed in the <i>Stakeholder Engagement Strategy &amp; Plan 2021</i>.</p> <p>The DRAI endorse the proactive and holistic approach to engagement set out in the Stakeholder Engagement Strategy &amp; Plan 2021. Specifically, we would like to acknowledge the value of the ESB Networks Innovation forum / webinar Series, which our members have found to be very informative in helping them gain an appreciation of ESB Networks priorities and also an early insight into new initiatives. We would also like to note our appreciation for the efforts taken to facilitate continued updates via webinars during the Covid-19 pandemic.</p> <p>The DRAI also acknowledge the increased the level of industry engagement from the ESB Networks in recent years, and in particular the considerable time and effort given to the quarterly bilateral forum with the DRAI. We would also like to recognise the efforts taken to continue this engagement via on-line virtual meetings during the prevailing restrictions.</p>	<p>We welcome these positive comments regarding our engagement strategy and approach. In particular we are pleased that our Spring and Autumn Innovation Webinar Series was so well received by our stakeholders. As a result, we intend to hold these series again in 2021. We also look forward to continuing our quarterly bilateral meetings with DRAI.</p>

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	<p>However, we also consider that they are really just the first step, and that much deeper engagement with the demand side industry will be required to fully integrate these technologies into the electricity system. We would therefore like to emphasise the need for more dedicated workshops to allow both parties to better understand how system flexibility can be optimised through the application of innovative technology to aggregation and control of demand and also the distribution network itself.</p> <p>Our members would also welcome the opportunity to become involved in the network flexibility activities designed to support the wider innovation strategy, for instance through trials or pilots to test new flexible technologies.</p> <p>Fundamentally, the DRAI believe there is a need for greater emphasis on system flexibility and we would like to see this developed in future ESB Networks Stakeholder Engagement Plans.</p>	<p>In relation to deeper engagement, the ASM Project Team are in the process of establishing stakeholder focus groups to share their insights and expectations, to inform the high-level design of our project, and also to inform how we consult and communicate throughout the delivery of this project. The members of the stakeholder focus groups will be made up of a selection of stakeholders across the relevant industry sectors. Our future engagement and how we approach it will be an output of these focus group workshops and associated surveys. However, we expect engagement will be a blend of issue led engagement with key experts across industry, public consultations, focus groups, bi-laterals and webinars. We have received DRAI's request to be part of these workshops and we look forward to this engagement.</p>
<b>Dingle Hub</b>	<p>Dingle Hub congratulates ESB Networks on the various different webinar series delivered throughout 2020. These webinars enabled a new level of engagement and information sharing among a much broader reach of stakeholders. We hope that the online provision of information in this manner will continue beyond the necessity driven by the current pandemic restrictions.</p> <p>Webinars to clearly explain feedback sought on various strategies to help guide the consultation process were exemplar and we hope that this approach will be adopted across many more agencies and sectors.</p> <p>We welcome the introduction of Stakeholder Panels to provide platforms for open discussion and feedback. We note the plans to establish an Innovation Stakeholder Panel and a Society and Communities Stakeholder Panel and welcome both but note the lack of community representation on the Innovation SP.</p>	<p>We recognise the importance and contribution that our innovation forums and other similar engagement initiatives have provided our stakeholders, allowing early engagement and feedback opportunities that feed into the development of our strategy, plans and policies. We are constantly exploring new means and tools for engagement and we will work with our stakeholders to find innovative ways of keeping us all connected through these difficult and uncertain times.</p> <p>We recognise the importance of building strong community engagement and have sought representation from Dingle Hub onto our Customer &amp; Society Panel. We look forward to building our collaboration with communities through these new pathways to engagement.</p>



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	<p>It is becoming increasingly evident that communities will be at the heart of climate action and the transition to a low carbon society and so we believe that a mechanism should be in place to capture community input for relevant innovation projects. This can be facilitated through the Society and Communities SP, but we would recommend that this panel is given opportunities to feed-in to Innovation considerations.</p>	
<p>Irish Solar Energy Association (ISEA)</p>	<p>ISEA welcomes ESB Networks general approach towards increasing stakeholder engagement. In recent years, ESB Networks have increased the volume of outreach activities to engage with the market, which has been a very positive development. The DSO should be commended for this. The stated commitment towards the integration of stakeholder views into decision making and network management is very welcome.</p> <p><b>Clarity on influence of stakeholder engagement;</b> suggests that while ESB Networks external delivery of its message has been enhanced, there is <b>room for improvements in the incorporation of feedback.</b> The engagement around the development of Non-Firm Access was welcome, and the outcome was a pragmatic solution. A number of those engaged from the industry side in that process suggested there could have been greater follow up around next steps. The output policy did not seem to incorporate a number of elements that had been discussed between the parties, and there seems to have been little rationale provided for the exclusion, leaving a question as to whether the input had been considered. We would suggest a <b>more structured approach to follow up communications where feedback has been solicited would be welcome.</b></p> <p>Firmer timelines and metrics around active system management and smart grid delivery outputs would be a positive development. As these initiatives potentially unlock renewable volumes, possibly minimising the requirement for some major distribution reinforcement projects, the industry would welcome evidence of greater urgency around this agenda. Table 1 in the appendix, suggests a potentially nine-month (Q2-</p>	<p>We note and welcome these positive comments and look forward to further meaningful engagement throughout 2021.</p> <p>We continue to share our analysis of feedback received externally in our response papers and reports. In our <a href="#">Report on Stakeholder Engagement for 2020</a> we included a new metric to record the number of stakeholder feedback responses to each of our public consultations and noted our published response to feedback reports in our table of publications.</p> <p>Currently our internal Stakeholder Engagement Steering Group made up of stakeholder leads from across the business provides overall direction to the stakeholder engagement feedback process. We will be developing a framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process across ESB Networks.</p> <p>Over the course of this project we will be actively engaging with stakeholders via a range of engagement (e.g. focus groups, round table</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>Q4) consultation period on Active System Management with limited detail on delivery.</p>	<p>discussions, request to respond to publications) to help us shape the project.</p> <p>We will be launching our communications consulting framework in Q3 2021, this will include an overarching project outline, and multi-year delivery plans and milestones associated with the delivery of the project.</p> <p>We encourage all stakeholders to register their interest in the ASM project. Please email: <a href="mailto:engagement@esbnetworks.ie">engagement@esbnetworks.ie</a></p>
<p><b>MaREI, SFI Centre for Energy, Climate and Marine</b></p>	<p>It is great to see an extensive consultation process associated with the development of the Stakeholder Engagement Strategy and Plan, and we were pleased to see reference to innovative community engagement initiatives such as the Dingle project and the Aran Islands.</p> <p>We would also like to also express interest in being represented on one of your External Stakeholder Panels, such as the Customer and Society Panel mentioned in the document.</p>	<p>We recognise the importance of building strong community engagement and look forward to welcoming our UCC/MaREI community representative onto on our new Customer &amp; Society Stakeholder Panel.</p>
<p><b>Wind Energy Ireland (WEI)</b></p>	<p>The Stakeholder Engagement Strategy and Plan 2021 contains many worthwhile projects and aspirations for greater improvements in engagement throughout several areas.</p> <p>Welcome and thank ESNB for the many positive steps and initiatives undertaken in 2020 in relation to stakeholder engagement in areas such as PR5, where a collaborative approach with industry delivered a successful PR5 outcome, as well as ongoing engagement in relation to ECP-2, and the establishment of the Innovation Stakeholder Panel, which WEI is a member of.</p> <p>A general comment would be that we welcome specific objectives or mechanisms for how ESNB intends to engage with stakeholders and feel this could be supported with metrics or outputs as to how to</p>	<p>We note and welcome these positive comments and will continue to enhance our reporting and transparency.</p> <p>We welcome this positive feedback. We are delighted that the renewable electricity sector is represented by WEI and ISEA as two of our 19 panel members on our newly established Innovation Stakeholder Panel.</p> <p>We continue to share our analysis of feedback received externally in response papers and reports. Currently our internal Stakeholder Engagement Steering Group made up of stakeholder leads from</p>

Respondent	High-level comments	ESB Networks Comment/Response
	<p>measure success. For instance, this could entail how comments, feedback and input from stakeholder engagement are recorded, considered and integrated into business activities or processes. It is important to put forward a clear framework for how stakeholder engagement is listened to, taken account of, and actively used including demonstration of how the engagement was taken on board and the outcomes of this.</p> <p>There appears to be a lack of focus on the generation side in ESN's customer experience activities and outcomes. Generators are paying for a service to connect to the system and, as users of the system, should be entitled to the same considerations as customers on the demand side. For instance, we suggest that there should be a customer satisfaction survey for generation customers too with KPIs to measure outcomes. This could be a means of measuring and incentivising improvements in outcomes for renewable generators connecting to the system. WEI carried out its own survey of members in 2020 to inform our response to the PR5 consultation. We have shared the question template and summary results of the survey with ESN and we welcome further engagement with you on how this might be rolled out as an ESN exercise going forward.</p>	<p>across the business provides overall direction to the stakeholder engagement feedback process. We will be developing a framework for this process to ensure a more structured approach to the dissemination and transparency of the stakeholder feedback process across ESN Networks.</p> <p>ESN Networks plan to carry out a more broad-based independent survey of key stakeholders' views and expectations in Q4 2021. Details to be provided by Q3 2021.</p>
<p><b>Energy Storage Ireland (ESI)</b></p>	<p>2021 is likely to be an even busier year for the storage industry with the development of multiple battery storage projects and the planned decision process for the future DS3 system service arrangements. We believe it would be beneficial to establish more regular engagement channels between ESN and Energy Storage Ireland which could focus on areas such as the grid connection process, battery storage operation, service provider requirements, testing and compliance and market design/trialling for new flexibility products to name a few. We welcome the opportunity to discuss this with you further.</p>	<p>We welcome the positive feedback received from ESI and look forward to continuing further engagement in 2021 on these important issues.</p>