



Energy for
generations

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Giniúint agus Trádála
Two Gateway, Bóthar An Phoirt Thoir
Baile Átha Cliath 3, D03 A995, Éire
Fón +353 1 676 5831

Generation and Trading
Two Gateway, East Wall Road
Dublin 3, D03 A995, Ireland
Phone +353 1 676 5831

ESB Generation and Trading Response:

Consultation-on-the-Terms-of-Reference-of-the-NSEE-Panel (CRU/19/015)

15th March 2019



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Contents

1. Introduction.....	1
2. Executive Summary.....	1
3. Response to Consultation Questions.....	1
3.1 Do you have any comments on the proposed Term of Reference of the Network Stakeholder Engagement Evaluation Panel?	1
3.2 Would you like to be appointed as a member of the Panel?.....	2

1. INTRODUCTION

ESB Generation and Trading (GT) welcomes the opportunity to respond to the Consultation-on-the-Terms-of-Reference-of-the-NSEE-Panel (CRU19015). The purpose of this Consultation Paper is to establish a Panel by seeking views on its terms of reference and expressions of interest from stakeholders who would be interested in becoming members of the Panel.

ESB GT's response is broken into two sections; the first is an executive summary of ESB GT's response to the Consultation Paper and the second section lists ESB GT's response to the consultation question.

2. EXECUTIVE SUMMARY

ESB GT believes through its numerous interactions with the System Operators it would be able to provide a valuable contribution to this Panel. Therefore, ESB GT would like to express an interest in becoming a member of the Panel.

Even though this consultation is on the Terms of Reference for the Panel, ESB GT considers that the assessment section should also include some element of an assessment on the *System Operators' demonstrable regard to Industry feedback*. Improving stakeholder engagement should not be solely focused on the TSO/DSO quality of demonstrable positive impacts on stakeholders from outward engagement but should also address the quality of TSO/DSOs processing/addressing of stakeholder feedback.

3. RESPONSE TO CONSULTATION QUESTIONS

In this section ESB GT has listed its response to the question from the Consultation Paper.

3.1 Do you have any comments on the proposed Term of Reference of the Network Stakeholder Engagement Evaluation Panel?

ESB GT's comments on the Terms of Reference are:

- Purpose:
 - It appears that a score of 5 has been identified as the baseline performance. There should be an understanding of what constitutes baseline performance before its performance evaluation as events during the year could change the baseline.
 - The paper states the panel is to determine a final score. The panel should also have within its remit to provide recommendations.
 - It may be useful to provide the panel with some example of strong evidence and inadequate evidence for the three categories.
 - The panel should provide some explanation along with the score.
- Governance Structure:
 - If the score is by consensus, do the RAs have the ability to deviate from the score?

3.2 **Would you like to be appointed as a member of the Panel?**

ESB GT would like to be appointed as a member of the Panel. ESB GT believes the range of its commercial interests can help provide the desired appropriate balance in the membership group as a single representative. ESB GT would like to appoint Jagtar Basi as the nominate representative and Paraic Higgins as the alternate.