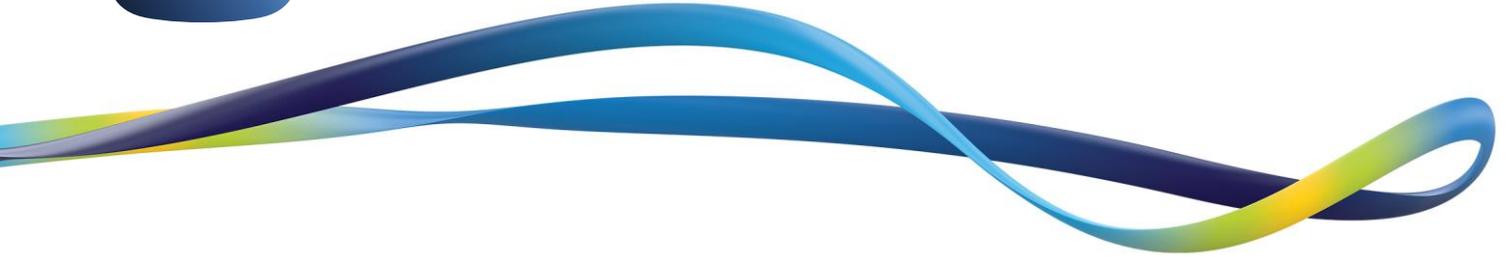




NETWORKS



RESPONSE PAPER

ESB Networks Response to Stakeholder
Feedback received from Consultation on
Stakeholder Engagement Report 2019

submitted to CRU on 08 May 2020

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Introduction

This report is intended to be read in conjunction with ESB Networks' **"Report on Stakeholder Engagement in 2019"**.

It summarises key feedback and recommendations received on ESB Networks stakeholder engagement performance which has been the subject of an incentive scheme evaluated by the CRU since 2019.

Background

The CRU published in May 2018 its Decision on Reporting and Incentives under PR4, CER/18/087, (the "Decision Paper"), setting out twenty decisions to improve reporting and incentives arrangements. One of the new incentives established by the Decision Paper is in relation to stakeholder engagement. The intention of the new incentive is to provide a clear and transparent framework for the annual assessment of the measures taken by the network companies to understand and address the needs of stakeholders.

The Decision Paper provided for a panel to assess and score the DSO and TSO separately on the quality, good implementation and the effectiveness of their stakeholder engagement strategies during the previous year. The score given by the Panel will determine the level of financial incentive the DSO and TSO each receive for their respective performance, impacting directly on the incentive revenues earned.

The DSO and TSO are each required to separately publish for consultation a report on their stakeholder engagement strategy and its effectiveness over the previous year. The Panel will consider the submissions from the SOs and their respective consultation responses before evaluating and scoring the performance of each SO.

ESB Networks submitted its **'Report on Stakeholder Engagement in 2019'** to the CRU on 31st March 2019 and the report was open to public consultation until 1st May 2020.

Report structure

This report is divided into two main sections.

1. Section one describes the recommendations received from the CRU panel in June 2019 on how ESB Networks should improve its stakeholder engagement and how this has influenced our approach to stakeholder engagement.
2. Section two describes the recent response to the consultation on 'ESB Networks **"Report on Stakeholder Engagement for 2019"**'. It lists the respondents and gives a summary of the key issues raised and how these may inform our future engagement with stakeholders.

1. Recommendations from NSEE panel in 2019

ESB Networks received valuable feedback from the evaluation process carried out by the CRU panel in 2019 on its stakeholder engagement for the previous year. This feedback, received in June 2019 and highlighted below, informed further developments in our engagement process during the remainder of 2019.

The DSO should engage with stakeholders in order to shape its stakeholder engagement strategy. Furthermore, the strategy should set out the impact that stakeholders had and should be published at the beginning of the year, following active stakeholder engagement on the development of the strategy.

Following this feedback in June 2019, we worked on developing an enduring '**Strategic Stakeholder Engagement Framework**' which we opened for consultation to our stakeholders in November 2019. The development of this framework and the key areas of engagement identified therein, was informed by ongoing engagements with stakeholder groups and their priorities regarding the distribution network. Following feedback from stakeholders on the consultation, we revised this strategy, and this is reflected in Section 1 of our '**Report on Stakeholder Engagement in 2019**'. It is our intention to review this strategy on an annual basis and based on ongoing interactions with stakeholders.

An example of the impact that stakeholders had on our strategy is that they suggested that we give specific examples of how engagement can work to the benefit of both ESB Networks and Stakeholders. We have endeavoured to highlight these benefits in our case studies presented in our '**Report on Stakeholder Engagement in 2019**'.

The Strategy should set out clear strategic objectives, linked to the activities and initiatives the DSO plans to undertake and set out clear measures of success.

In our '**Strategic Stakeholder Engagement Framework**' we set out our engagement strategy and strategic engagement objectives aligned with our business objectives. The key areas of engagement as outlined in our strategy are linked to our key business activities and initiatives (for example, the major engagement involved in the National Smart Metering Programme is vital to the successful delivery of this major investment initiative, while the engagement supporting the PR5 planning process is key to the future sustainable development of the network, reflecting the needs of all stakeholders). We then consulted with our stakeholders to further shape this strategy.

We will continue to engage with stakeholders using a variety of means (e.g. meetings, seminars, workshops) to build on this engagement strategy, providing opportunities for stakeholders to inform our planning and overall engagement approach. Such collaboration will be particularly important given the ongoing Covid-19 crisis and we will work with our stakeholders to engage in new ways so that together we can continue to deliver on the benefits of our engagement process.

We continue to work on measuring engagement success. We have set out several approaches in Section 3 and highlight key engagement metrics on pages 31-32 of our '**Report on Stakeholder Engagement in 2019**'. We will continue to engage with our stakeholders on measurement approaches and have received valuable feedback from the current consultation on how we can further develop our metrics (as noted in Section 2 of this report).

The organisational structure for delivering the strategic objectives should also be specified with details of contact people provided on the website for each initiative.

As noted in our '**Strategic Stakeholder Engagement Framework**', our stakeholder management team works closely with stakeholder leads in each area of our business, (together forming our "Stakeholder Engagement Steering Group") ensuring that engagement forms a core element of our business processes, remains embedded in our business culture, and is seen as a key element of the way we work by each employee within the organisation. During the current Covid-19 crisis, our "Stakeholder Engagement Steering Group" has been key to liaising with critical infrastructure stakeholders and providing points of contact in case of emergency. We are continuing to provide additional pathways and opportunities for stakeholders to engage with us. For example, we have initiated spring and autumn 'Innovation Forums' to provide a pathway for engagement with stakeholders on our innovation strategy.

The DSO's report on the strategy should ensure that a balanced view is presented, including the areas where things did not go as well as expected. Lessons learned should be specified and how these experiences have led to improvements in approach (or will be incorporated into an improved approach).

Several case studies in our current '**Report on Stakeholder Engagement in 2019**' reflect adjustments to improve our engagement process based on stakeholder feedback. For example, our 'lean connections' project reflects our ongoing engagements with renewable generators and the importance of a streamlined and efficient connection process to deliver our national targets in this key area. Also, our ongoing work to mitigate the effect of network outages on windfarm export capacity reflects continuous engagements with these generators.

The DSO should consider the approaches to evaluating the impact of its stakeholder engagement, including independent research/evaluation which is subsequently disseminated publicly.

We appreciate the value of independent research in our engagement process. For example, independent research services were used in the PR5 engagement process, as detailed in the PR5 case study in the current '**Report on Stakeholder Engagement in 2019**', including focus groups and quantitative research of customer groups countrywide. Testimonials from our PR5 workshops with business customers were also obtained following delivery of these workshops through Chambers of Commerce in Galway, Sligo, Dublin and Dungarvan. Independent benchmarking and sentiment analysis are also utilised in the National Smart Metering Programme, as outlined in the case study for this project also provided in the '**Report on Stakeholder Engagement in 2019**'.

The emphasis on safety was well communicated and should be maintained in future reports; additionally, the report should be accessible in terms of plain English.

Safety remains a key priority in our engagement strategy, aligned with the critical importance of electrical safety for our business and all our customers and stakeholders. This is demonstrated in our case study on safety in the current '**Report on Stakeholder Engagement in 2019**' and the very positive feedback from stakeholders in the consultation process, outlined in Section 2 below.

We understand the importance of clear communication such that our approach can be understood by all our stakeholders and customers. In the current '**Report on Stakeholder Engagement in 2019**' we have made every effort to use clear language and have endeavoured to make the topic clear and understandable using the case study approach. We welcome the feedback from Chambers Ireland that "the report was overall well-presented and easy to understand" and the comments by IWEA on the report format noting "we also acknowledge the improved layout and structure of the Stakeholder

Engagement Report 2019 and appreciate that ESBN has taken on board feedback provided on the 2018 report.”

The DSO should benchmark its performance with best practice in other countries and demonstrate this in its report.

Our principles of engagement outlined in our strategy are in accordance with international best practice and standards, specifically the *AA1000 Stakeholder Engagement Standard (2015)* and *AA1000 Stakeholder Engagement Principles (2018)* available at: <https://www.accountability.org/standards/>.

This standard is used by many organisations, utilities and DNOs (e.g. UK Power Networks, EDF and Eskom). Our strategy was informed by a review of engagement approaches used by leading GB DNOs, who have performed well under the GB industry incentive for engagement. Our **‘Strategic Stakeholder Engagement Framework’** reflects this best practice and has been updated following consultation with our stakeholders. We plan to discuss best practice approaches to engagement with GB DNOs over the coming period to further inform our strategy and practices with a view to benchmarking our approach in 2021.

The DSO report should identify how its relationship with stakeholders is managed based on their different needs.

Our strategy reflects an understanding of the different levels of engagement (inform, involve, collaborate) which are appropriate depending on the nature and materiality of the subject of engagement. The level of engagement that is appropriate is considered during the planning phase. This involves an assessment of the materiality of the subject matter of engagement both for our stakeholders and our business and includes an evaluation of potential impact and risk. Issues of major significance, involving high levels of investment, impact and risk, (for example the Smart Metering programme and the PR5 investment plans) will warrant greater levels of engagement. Where the issue has lower significance and less impact, the provision of information may be more appropriate. In each case we will discuss our approach with our stakeholders.

The participation of senior management in the process was welcomed by the Panel and recommended for future engagements with the Panel. Some of the members were of the view that Stakeholder Engagement should be presented to the Board of the company, at least annually.

Stakeholder engagement is seen as a vital activity at every level of our business and, as a strategic priority, is led by the Directors and the senior leadership team. We have appointed a senior manager with responsibility for stakeholder engagement who leads a dedicated team devoted to stakeholder engagement within our Strategy and Engagement group. This team works closely with Stakeholder Leads in each area of our business, ensuring that engagement forms a core element of our business processes and remains embedded in our business culture and is seen as the role and responsibility of every employee within the organisation. Monthly key milestones and events are reported and feed into Director and Board-level briefings and reporting (including the Annual Report for 2019).

2. Consultation feedback on 2019 Engagement Report

There was a total of thirteen respondents to the public consultation on ESB Networks' **'Report on Stakeholder Engagement in 2019'**. We welcome this positive level of response to our engagement process, particularly given the challenges related to the COVID-19 pandemic.

List of respondents
1. Limerick City and County Council
2. Tipperary County Council
3. Mayo County Council
4. Construction Industry Federation CIF (Galway Office)
5. Irish Farmers Journal
6. Health & Safety Authority
7. UCD Energy Institute
8. Chambers Ireland
9. Demand Response Association of Ireland DRAI
10. Irish Wind Energy Association IWEA
11. Garda Community Engagement & Public Safety Bureau
12. Energy Storage Ireland
13. Bord Gais Energy

The following describes some of the key points and themes arising from the consultation process which will inform our future engagement with stakeholders. A tabulated high-level summary of the consultation feedback from each respondent is provided in Appendix 1.

Significant Improvements in Stakeholder Engagement

All respondents welcomed the positive stakeholder engagement developments that have taken place in 2019. It was noted that there were significant improvements in the overall stakeholder process in terms of strategy, management involvement, accountability and reporting, alignment with strategic objectives with demonstrated channels and initiatives to support the delivery of the engagement activities. Most felt that there was significant improvement in their own engagements with ESB Networks throughout 2019 and look forward to building on this continued engagement into the future.

Presentation of Report

There was generally positive feedback regarding the presentation of the report, and we welcome the comments that “the report was overall well-presented and easy to understand” and that “the stakeholder engagement process is clearly articulated in the document and we welcome the actions underway to address comments received through previous consultations”.

One respondent questioned whether the report adequately presented a balanced view and recommended that examples of improvements driven by stakeholder feedback would provide this objective viewpoint. Several case studies in our **‘Report on Stakeholder Engagement in 2019’** reflect adjustments to improve our engagement process based on stakeholder feedback. For example, our ‘lean connections’ project reflects our ongoing engagements with renewable generators and the importance of a streamlined and efficient connection process to deliver our national targets in this key area. Also, our ongoing work to mitigate the effect of network outages on windfarm export capacity reflects continuous engagements with these generators.

Engagement Strategy & Plan

Respondents recognised the effort put into developments made by ESB Networks in 2019 such as the publication of our **‘Strategic Stakeholder Engagement Framework’** and **‘Strategic Stakeholder Engagement Plan 2020’**. However, some respondents reflected on the late publication of these documents in relation to activities in 2019. Our **‘Strategic Stakeholder Engagement Framework’** is an enduring strategy demonstrating our engagement approach which was adopted and guided our engagement activities for 2019. For instance, the framework identifies the key areas of engagement conducted during 2019 such as PR5, Smart Metering, Connecting Renewables, Safety and Innovation which are of strategic importance to both our stakeholders and business alike. The strategy was developed and informed by ongoing engagements with stakeholder groups and their priorities regarding the distribution network. A formal consultation process was then conducted with our stakeholders in late 2019. Following feedback from stakeholders on the consultation, we revised this strategy, and this is reflected in Section 1 of our **‘Report on Stakeholder Engagement in 2019’**. It is our intention to review this strategy on an annual basis and based on ongoing interactions with stakeholders.

Managing Stakeholder Engagement

One respondent noted “ESBN’s 2019 Report presents a strong picture of involvement of ESBN management and personnel in the Stakeholder Engagement Strategy through its ‘Managing Stakeholder Engagement’ section. Involvement from business area leads, stakeholder engagement team, and directors and senior leaders demonstrate good accountability and reporting through management for delivery of the stakeholder strategy. What is not apparent in the 2019 Report is evidence that this process was in place and operating for 2019 as the year to which this report applies”.

We appointed a senior manager in November 2018 with overall responsibility for stakeholder engagement, leading a dedicated stakeholder engagement team within our business. This team worked closely with stakeholder leads in each area of our business throughout 2019.

Engagement Metrics

Many felt that the introduction of metrics in the report was a positive step to developing better measures of engagement performance. It was suggested that stakeholder metrics could be more “inclusive of all stakeholders, and not tailored to specific groups”. ESB Networks look forward to working with all stakeholders to further strengthen the metrics deemed most appropriate for measuring the effectiveness of our engagement activities.

Early engagement

Many respondents highlighted the importance of early in-depth engagement. It was suggested that this could include discussion papers and working groups which would offer opportunity to provide feedback on proposals. Early and consistent engagement with developers was noted as extremely important. ESB Networks understands the importance of meaningful early engagement and appreciates the positive impact this has on delivering better outcomes in a timely manner. For example, the changes being implemented in the ECP-2 process recognise this, involving ESB Networks engaging early with project developers through connection method meetings to ensure that projects have a higher likelihood of moving forward successfully. We will provide more detailed network information (e.g. network capacity heat maps) in advance of the ECP-2 process and will allow projects where possible the opportunity to optimize their Maximum Export Capacity, potentially increasing their viability.

Connecting Renewables

Some respondents raised issues relating to the communication and timelines relating to the connection offer process. They also noted an opportunity for ESB Networks and EirGrid to review their respective procedures and interactions in this regard. Respondents welcomed the rollout of the ‘Lean Connections Project’ this year and are keen on engaging with ESB Networks in the planning and review stages for this project and welcome further clarity on potential workshops with industry. ESB Networks will continue to provide regular updates to and engage with key stakeholder groups as this project progresses. The project was created in response to feedback from customers and stakeholders. There are additional developments underway in response to continued feedback such as the proposed engagement process in ECP-2 which was supported by ESB Networks (described above). We will continue to engage with our renewable stakeholders to ensure that their views are heard and inform our business practices.

Outages

Some respondents would like to engage with ESB Networks to discuss how communication of outages could be improved and to better understand how renewable generators can engage with the System Operators on how the impact of outages can be minimised and planning flexibilities addressed. It has been suggested that these be included in the 2020 stakeholder engagement plan with specific activities in relation to workshops with industry associations such as IWEA.

Outage planning is a key stakeholder engagement activity of ESB Networks and although not expressly described in our **‘Report on Stakeholder Engagement in 2019’** there have been many positive developments in this regard over recent years and in 2019: e.g. increasing flexibility to allow connection of more renewable generation and in mitigating the impact of outages on existing renewable

generators. ESB Networks have included further engagement with IWEA and other stakeholders in relation to this in our plans for 2020.

Engagement Activities

Many respondents acknowledged the value of several new engagement activities such as the Innovation forum, workshops, surgeries and additional meetings that are very helpful in enabling an appreciation of ESB Networks priorities and an early awareness of new initiatives. For example, DRAI noted with regard to case study 6: 'Planning our future low-carbon network': "Our members have found the meetings and workshops with ESB Networks to be an effective form of engagement - we have an opportunity to talk through market issues in detail and to present the demand side industry perspective to experienced ESB Networks staff. In doing so we all get a better understanding of how each issue affects different stakeholders and are therefore well placed to develop enduring solutions".

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. The recent Skype presentation on ESB Networks' Network Flexibility Trial was cited as a good example of this adaptation of alternative approaches to continue engagement in the absence of direct personal contact.

Safety

A very positive response was received from partnerships formed with the local authorities, Fire Service, An Garda Síochána, Farmers Journal, Construction Industry Federation Industry and the Health & Safety Authority on electricity safety. Respondents felt that ESB Networks has been pro-active in sharing best practice and knowledge of management of electricity risks in construction, farming and general health and safety initiatives and campaigns to ensure continued safety to the public. Participation and contribution by ESB Networks at various emergency service seminars and events was very well received. The HSA believes that activities of this nature help raise awareness and may not be unrelated to the fact that for two years in a row (2018 and 2019) nobody has been killed in Ireland from the direct effects of electricity. ESB Networks is fully committed to continue to build on this positive engagement ensuring safety remains our priority.

Our Website

It was noted that improvements could be made to the Publications area of the ESB Networks website to improve the customer/stakeholder experience. A project is now underway and investment has been allocated to improve our website in 2020.

APPENDIX 1: TABLE OF RESPONDENTS & FEEDBACK

Respondent	Summary of Feedback
Limerick City and County Council, Tipperary County Council, & Mayo County Council,	<p>ESB have been pro-active in sharing best practice and knowledge of risk management of electricity risks in Construction. For example; participation and contribution by ESB Networks at various emergency service seminars very well received and offers an opportunity for attendees to seek information on safety for electrical incidents and practical precautions for the local authority fire service in dealing with such incidents.</p> <p>Hope that the continuing availability of the ESB safety team is still in place to continue deliver any such training (when requested) to the fire services at local authority level i.e. fire stations as well, on an ongoing basis.</p>
Construction Industry Federation (CIF) (Galway Office)	<p>ESB Network briefings well received by members, offered opportunity to raise queries with the regional ESB Network officials, as well as providing opportunity to discuss with members ESB Network procedures, standards, safety, etc.</p> <p>The CIF members also received the names and contact details of ESB Network officials in their region.</p>
Irish Farmers Journal	<p>Positive partnership between ESN and Irish Farmers Journal under the banner of Safe Family Farms. Specific examples of 2019 engagement activity highlighted; farm safety videos, farm safety school's competition, events such as Ploughing, Tullamore Show, Dairy Day and Grass & Muck.</p>
Health & Safety Authority	<p>The HSA has had positive engagement with ESB Networks on several fronts in 2019, some examples include;</p> <p>ESB Network dedicated high level resources to modernising their Code of Practice for Avoiding Danger from Overhead Electricity Lines. Following extensive consultation within ESB Networks, within the HSA and an open external consultation process, this Code of Practice was finalised in 2019.</p> <p>The HSA also welcomes the extensive media campaign undertaken by ESB Networks to highlight the dangers associated with overhead lines and particularly ESB Network's Radio safety messaging with its weather sponsorship on RTÉ Radio 1 highlighting the dangers of overhead lines when carrying out farming and construction activities.</p> <p>The HSA believe that activities of this nature help raise awareness and may not be unrelated to the fact that for two years in a row (2018 and 2019) nobody has been killed in Ireland from the direct effects of electricity</p>

	<p>ESB Networks was also a valuable and key contributor to the National Electrical Safety Committee when it was hosted by the Commission for Energy Regulation in 2019.</p> <p>ESB Networks has given freely of its time and resources to help train new HSA inspectors on the basic and substantive hazards of electricity.</p>
<p>UCD Energy Institute</p>	<p>The stakeholder engagement process is clearly articulated in the document and we welcome the actions underway to address comments received through previous consultations.</p> <p>The benefit of stakeholder engagement has been clearly shown in this consultation. It is important that this engagement is continued in this uncertain time of the Covid-19 pandemic and that alternative approaches are sought to continue engagement in the absence of direct personal contact. The Skype presentation on ESB Networks' Network Flexibility Trial is a good example of this adaptation.</p> <p>We have seen significant improvement in our engagement with ESB Networks throughout 2019 and look forward to continued engagement into the future as we deliver the energy transition to a low carbon future.</p>
<p>Chambers Ireland</p>	<p>The report shows the strong level of engagement that ESB Networks had with all stakeholders in 2019 which included Chambers Ireland, our network of Chambers and our members. We welcome the continued engagement across all the areas outlined in the document into the future.</p> <p>We were delighted to work with ESB Networks to enable them to engage with local businesses in four different geographic locations around the country. The businesses that attended were both large and small and represented the various sectors which make up ESB's customers and stakeholders. We were delighted with the acknowledgement of this key engagement with our members in the document.</p> <p>We were impressed by the use of technology to engage their stakeholders in 2019 and I'm sure that this will continue in the future.</p> <p>The reach of the engagement was also impressive and the introduction of metrics in the report was a positive.</p> <p>The report was overall well-presented and easy to understand.</p>
<p>Demand Response Association of Ireland (DRAI)</p>	<p>DRAI emphasise the importance of early, in-depth engagement, perhaps through discussion papers and/or dedicated working groups, which would offer our members the opportunity to provide feedback on proposals and inputs based on their experience of similar projects both within Ireland and elsewhere.</p> <p>DRAI support the proactive approach to engagement set out in the Stakeholder Engagement Report 2019 and acknowledge that throughout the year ESB Networks has strived to include representatives from across</p>

each of the key stakeholders' groups. Our members are also very much encouraged by the engagement principles set-out in the report.

DRAI acknowledged the value of several new engagement activities - Innovation forum and also the recently established quarterly meetings with the DRAI. To date, have found these fora highly effective in encouraging communication between ESB Networks and our members, and we believe continued engagement will be very helpful in enabling our members to gain an appreciation of ESB Networks priorities and also early awareness of new initiatives, whilst also allowing the DRAI to explain how the performance of new flexibility technologies can be optimised through network innovations.

Case Study 6 Planning our future low-carbon network: Our members have found the meetings and workshops with ESB Networks to be an effective form of engagement -- we have an opportunity to talk through market issues in detail and to present the demand side industry perspective to experienced ESB Networks staff. In doing so we all get a better understanding of how each issue affects different stakeholders and are therefore well placed to develop enduring solutions.

IWEA welcomes the positive stakeholder engagement developments that have taken place in 2019 on the part of ESNB such as the connection of over 450MW of wind generation on the system, engagement with industry in relation to the distribution planning standards review, the IBM Simpler connection process review and ESNB's innovation activities.

IWEA acknowledge the improved layout and structure of the Stakeholder Engagement Report 2019 and appreciate that ESNB has taken on board feedback provided on the 2018 report.

Early and consistent engagement with developers is extremely important in terms of processing connections

The connection offer process for renewable generations was consistently raised by members as the key area where improvements were needed by ESNB in order to deliver 2030 ambitions. Members look forward to the rollout of the 'Lean Connections Project' this year. IWEA would be very keen on engaging with ESNB in the planning and review stages for this project and welcome further clarity on potential workshops with industry

ESNB's stakeholder engagement activities would benefit from more specific objectives and metrics. 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. We note that this suggestion for "clear measures of success" is discussed in the chapter on 'Feedback and Learnings' within the stakeholder report and we look forward to seeing these measures implemented.

IWEA believes that a customer satisfaction survey for generation customers should be introduced with KPIs to measure outcomes and incentives against performance targets.

**Irish Wind Energy
Association (IWEA)**

	<p>Some misalignment between ESB and EirGrid in terms of progressing grid delivery works. Lead times for contestable works are still very long and the processes in place between System Operators are causing delays.</p> <p>The availability of system information to help developers understand and plan projects could also be significantly improved.</p> <p>We appreciate ESBN's engagement with IWEA on the PR5 process, in particular the PR5 workshop held in July 2019.</p> <p>IWEA would like to engage further with ESBN to discuss how communication of outages could be improved. We also would like to understand how renewable generators can engage with the System Operators on how the impact of outages can be minimised and planning flexibilities addressed. Again, we suggest that this be included in the 2020 stakeholder engagement plan with specific activities in relation to workshops with industry associations such as IWEA.</p> <p>Suggest an annual survey should be introduced on generator customers experience of ESBN's stakeholder engagement activities and this could be a means of measuring and incentivising improvements in outcomes for renewable generators connecting to the system. IWEA is currently developing a survey for its members to assist in this regard which we hope to circulate in the coming weeks to help inform our response to the upcoming PR5 consultation. We believe this could form a template that ESBN could use going forward and we would be happy to engage further with you to see how this could be progressed.</p>
<p>Garda Community Engagement & Public Safety Bureau</p>	<p>The ESB is an active stakeholder on the Garda National Metal Theft Forum since its establishment in September 2011. The ESB constructively participates on the forum with national transport and utilities providers, local authorities, Government agencies and An Garda Síochána to discuss issues dealing with cable theft crime, i.e. health and safety risks and interruption to electricity service provision. The ESB shares informative presentations, reports and reference material. An Garda Síochána welcomes this ongoing active stakeholder engagement with ESB Networks.</p>
<p>Energy Storage Ireland (ESI)</p>	<p>We stress the need for early and consistent engagement with developers in order to try and manage the most efficient and cost-effective connections to the grid.</p> <p>Several our members have noted that there is room for improvement in the existing connection process and have highlighted issues regarding lack of communication and delays to offer timelines which has added considerable uncertainty and risk to projects that need to meet specific development deadlines in order to secure DS3 system services contracts. Some of these issues may be due to the connection process interactions between ESBN and EirGrid as there is uncertainty as to how this is managed, appears to be inconsistencies in terms of the information received when dealing with both organisations. We would recommend that the ESBN and EirGrid connection teams carry out a lesson learned review of their processing procedures of</p>

	<p>storage technologies for ECP-1 so that these inconsistencies are not repeated in future. We are open to being part of this review and providing detailed examples of some of the issues our members have encountered.</p>
<p>Bord Gais Energy (BGE)</p>	<p>In general, while certain positive developments in ESBN engagement approaches have occurred BGE believes that there is opportunity for improvement across ESBN’s Stakeholder Engagement process, based on the evidence provided in the 2019 Report and our own stakeholder experiences in the year.</p> <p>BGE also acknowledges and welcomes the engagement invited by ESBN through the innovation forums, group discussions and bilateral follow-ups.</p> <p>We recognise good service and engagement from various teams across ESBN on operational, business-as-usual (BAU) activities such as meter reading and market enquiries, and we look forward to continuing this productive relationship.</p> <p>We recognise the effort put into developments made by ESBN in 2019 such as the publication of their Strategic Stakeholder Engagement Framework and Strategic Stakeholder Engagement Plan 2020 at the end of 2019 but question the usefulness of the framework for activities in 2019 given its late availability.</p> <p>ESBN’s 2019 Report presents a strong picture of involvement of ESBN management and personnel in the Stakeholder Engagement Strategy through its “Managing Stakeholder Engagement” section. Involvement from business area leads, stakeholder engagement team, and directors and senior leaders demonstrate good accountability and reporting through management for delivery of the stakeholder strategy. What is not apparent in the 2019 Report is evidence that this process was in place and operating for 2019 as the year to which this report applies.</p> <p>We would appreciate clarification if Case Study 2 was inclusive of all stakeholder groups in the NSMP, and what considerations were given to informing the process of engagement followed and any related tailoring required. We acknowledge the vital stakeholder role that customers have in the NSMP, however consideration should be given to other key stakeholders in the determination of successful engagement. We ask that a supplier focused success criterion is added in future iterations of the report.</p> <p>The “Measuring Stakeholder Engagement” and the “Measures of Success” set out in the report do show good attention to this important aspect of stakeholder engagement. However, the application of these measures of success needs to be consistent in the case studies highlighted in the 2019 Report. It does not appear from the 2019 Report that this approach was followed for each project to present stakeholders with a uniform framework for assessing the level of success. Again, we ask that a supplier focused success criterion is added in future iterations of the report. Overall, the measuring of success and the indicators used in reporting on project</p>

engagements should seek to represent a balanced perspective, representative of the wider stakeholder population.

We believe that there is scope for ESN to demonstrate an element of proactiveness for customers with regard to DSO/ TSO interactions. An example is where generation parties are applying for new connections to the system but there is a lack of clarity if the connection is to be made to the transmission system or distribution system. Proactive stakeholder/ customer service by the DSO to liaise with the TSO and their customers in a timely manner and provide clarity for the customer would show clearly that ESN are “putting stakeholders at the heart of what you do”.

BGE believes that there is an opportunity for improvement in the 2019 Report to be more objective in its reporting of impacts (positive and negative) of engagement on the stakeholders and the business so that a balanced perspective of the level of success in the area of engagement in question can be ascertained. Request examples where negative impacts from stakeholder engagement were considered to drive improvements to the engagement process and strategy;

BGE believe that improvements could be made to the Publications area of the website to improve the customer / stakeholder experience. The ability to group consultations and their associated documents by year, topic (e.g. stakeholder plan) or status could help website users obtain the information sought quickly, concisely, and most important holistically so they are confident they have all the necessary information