



# Stakeholder Engagement Plan for the Distribution System Security and Planning Standards Review Project

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## 1. Introduction

The electricity industry is undergoing unprecedented change and how electricity is produced and consumed is fundamentally altering. We must adapt to these changes while continuing to provide our customers with secure, safe and affordable electricity.

ESB Group have recently revised their overall Strategy Statement with five Strategic Objectives that underlie the strategic intent of the Group.

The first objective refers to the need to put customers' current and future needs at the heart of all our activities and the second refers to the need to produce, connect and deliver clean, secure and affordable energy. Key to those objectives is the need to develop a safe, smart, reliable network that enables the transition to low carbon and encourage the transition of heat and transport from fossil fuel to low carbon alternatives by facilitating and leading electrification.

The current issue of the Distribution System Security and Planning Standards (hereafter referred to as the 'Planning Standards') was approved by the Commission for Regulation of Utilities (CRU) in January 2015, following a consultative process, and plays a major role in the development of a safe, secure, reliable, economic and efficient distribution network in Ireland. With the changes in the electricity industry, ESB Networks (ESBN) believes it is timely that a review of the Planning Standards is carried out. The Planning Standards Review Project forms part of the wider distribution network planning documentation used in ESBN and its review also forms part of ESBN's Innovation Strategy<sup>1</sup>, and is included under the 'Connecting Renewables' Innovation Roadmap<sup>2</sup>.

As part of this review project, ESBN intends to carry out an extensive Stakeholder Engagement with the key individual and group Stakeholder classes, to assess the opinions, requirements and needs of each Stakeholder class, in their interactions with ESBN and the distribution network and determine how best to address them. ESBN believes that collaboration with external parties is key to ensuring effective innovation and that innovation will have wider benefits to Irish society through improved efficiency, reduction in environmental impacts and customer empowerment. This forms part of our vision and value pillars which are the foundation of our Innovation Strategy and centred on the needs of our customers and other Stakeholders.

Stakeholder Engagement and understanding our Stakeholder needs forms a very important part of the Planning Standards Review Project. Gathering Stakeholder views and opinions and considering their needs and requests will be a fundamental part of the research and assessment phase of the project. The consideration of these views and opinions may inform revised approaches to how we plan the future distribution network, and how new connections and reinforcements are planned.

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<sup>1</sup> <https://www.esbnetworks.ie/who-we-are/innovation/our-innovation-strategy>

<sup>2</sup> <https://www.esbnetworks.ie/who-we-are/innovation/our-innovation-strategy/connecting-renewables>

## i.Scope

This document sets out the scope, detail and methodology of the Stakeholder Engagement Plan to be undertaken as a fundamental part of the Planning Standards Review Project.

## ii.Mandatory references

There are no mandatory references in this document.

## 2. Objectives of the Planning Standards Review

ESBN aim to facilitate the growth of renewables connected to the grid and to examine the impact of increased connection of domestic and non-domestic Distributed Energy Resources (DER) and renewables on our future electricity system and establish how our Planning Standards and Policies need to evolve to support their connection, in the most economic method possible while maintaining network resilience and security of supply.

The aims of the Planning Standards Review are to:

- Review and understand how our Planning Standards need to evolve to meet the changes in the electricity industry
- Review and understand how our Security of Supply standards need to evolve to meet the changes in the electricity industry
- Facilitate and enable the connection of further DER to the distribution network in an economic and efficient manner, in order to assist in the continued decarbonisation of the overall energy sector and the meeting of national and EU targets in this respect
- Achieve a revised copy of the Planning Standards that balances the needs of key Stakeholders including ESNB, CRU and customers
- Achieve a revised copy of the Planning Standards that is approved by the CRU
- Ensure roll-out of the revised Planning Standards across ESNB for use as ‘business as usual’ in Quarter 1 of 2020. There may be a staged implementation of the revised Planning Standards because some aspects of the Standards may be dependent on active network management systems and technology being available on the network.

### 3. Purpose of Stakeholder Engagement

Stakeholder Engagement aims to better understand concerns and viewpoints of customers and network users, and respond to them. ESNB believes that Stakeholder Engagement and Management are central to the success of this project and should be designed into the project structure.

Reasons why we are carrying out Stakeholder Engagement:

- To ensure the process of developing revised Planning Standards is transparent
- To establish early buy-in from all relevant Stakeholders
- To give all Stakeholders a chance to contribute to the outcome of the review
- To ensure industry consensus can be reached, as much as possible, ensuring that the revised copy of the Planning Standards balances the needs of key Stakeholders including ESNB, CRU and customers
- To make the implementation of the revised Planning Standards easier as the rationale will be documented and clearly communicated

## 4. Stakeholder Engagement Strategy

Stakeholder Engagement will be split up into the following three phases:

1. Initial engagement and draft terms of reference
2. Ongoing engagement keeping Stakeholders informed with updates at regular intervals throughout the project and ensuring that Stakeholders are aware of proposed changes to the Planning Standards ahead of internal approval
3. Final engagement summarising conclusions, ensuring that we have recorded, assessed and responded to all Stakeholder issues and ensuring that Stakeholders are aware of the final Public Consultation on the revised Planning Standards ahead of CRU approval

The three phases of Stakeholder Engagement can be broken down further as follows:

1. Initial engagement and draft terms of reference for the project
  - a. Develop a Stakeholder Plan including a Stakeholder Engagement Timeline (this can and will evolve over time)
  - b. Identify the full range of ESNB Stakeholders with whom we should seek to engage
  - c. Divide Stakeholders into appropriate groups
  - d. Engage with Stakeholder groups on a wide range of issues, e.g. technical, regulatory and commercial, as relevant to the Planning Standards Review
  - e. Consider the format that engagement should take and whether different methods should be used to facilitate participation from different groups
  - f. Identify the appropriate issues to engage groups and understand the support Stakeholders need to allow them to effectively participate in the Stakeholder Engagement
  - g. Record, Assess and Respond to all issues highlighted. To ensure the full value of engagement, we must effectively record all issues, review and decide what issues are in scope and out of scope, ensuring feedback is provided with clear explanations for issues that are out of scope
  - h. Use this information to build a terms of reference document for the project and to produce tender documents for required consultancy support work
  - i. Recruit potential users for any trials we intend to carry out throughout the review
2. Ongoing engagement
  - a. Keep Stakeholders informed with updates at regular intervals throughout the project as defined in the Stakeholder Plan
  - b. Ensure Stakeholders are briefed and aware of proposed changes to the Planning Standards ahead of the internal approval process
3. Final engagement
  - a. Summarise conclusions of project ensuring that we have recorded, assessed and responded to all Stakeholder issues
  - b. Ensure Stakeholders are aware of the final Public Consultation on the revised Planning Standards ahead of CRU approval giving them the opportunity to make further comments.

#### 4.1. Identifying Relevant Stakeholders

Stakeholders are those who may be affected by the Planning Standards Review Project, who have directly relevant experience, or who will be interested in the results.

A similar exercise is currently underway in the UK, whereby the existing Security of Supply Standard (P2) is undergoing a revision, which has been initiated by the GB Distribution Code Review Panel and by way of comparison, we looked at the Stakeholder groups included in that review. The following Stakeholders were included on the panel for the review.

- Distribution Network Operators (DNOs)
- Distributed Generator (DG) Customers
- Third parties - e.g. GTC (Independent utility infrastructure & network provider), AMPS (Technical committee), RES (Independent renewable energy company)
- National Grid
- The Office of Gas and Electricity Markets (OFGEM) – The GB regulator
- Department of Energy & Climate Change (DECC) – DECC is included due to their role in both renewables policy and implementation, as well as their deep involvement in industry working groups
- Others – DNV, Imperial College London and NERA Economic Consulting are also involved in the review project

The Stakeholder groups identified for the Planning Standards Review Project are shown in Table 1.



Table 1: Stakeholder Groups Identified

GROUP 1 Electricity Industry Parties	GROUP 2 Network Users
<ul style="list-style-type: none"> <li>• ESBN: Network Development &amp; Electrification, Network Operations, Network Assets</li> <li>• Eirgrid</li> <li>• Northern Ireland Electricity (NIE)</li> <li>• ESB International (ESBI)</li> <li>• Energy Networks Association (ENA)</li> <li>• Distribution Code Review Panel (DCRP)</li> <li>• Equipment Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Demand</li> <li>• Renewables</li> <li>• Demand Response Groups</li> <li>• Storage Groups</li> <li>• Data Centre Groups</li> <li>• Large Customers</li> <li>• Farmers Associations</li> </ul>
Group 3 Government Interests	Group 4 Others
<ul style="list-style-type: none"> <li>• Commission for Regulation of Utilities (CRU)</li> <li>• Department of Communications, Climate Action and Environment (DCCA)</li> </ul>	<ul style="list-style-type: none"> <li>• Academics from Universities</li> <li>• Sustainable Energy Authority of Ireland (SEAI)</li> <li>• Electricity Association of Ireland (EAI)</li> <li>• Association of Irish Energy Agencies (AIEA)</li> <li>• Industrial Development Authority (IDA)</li> <li>• Irish Business and Employers Confederation (IBEC)</li> <li>• Environmental Groups</li> <li>• Local government</li> <li>• Community energy groups</li> <li>• Regional Assemblies</li> </ul>

#### 4.2. Method of Engagement for each Stakeholder Group

We have identified our Stakeholders and divided them into groups. We recognise that the method of engagement for each Stakeholder group is important and the method of engagement that we choose will depend on which group we are engaging with.

We intend to engage with our Stakeholders through presentations, workshops and consultations, as deemed appropriate to the group or type of Stakeholder (e.g. representative body, industry group, dispersed group of customers, single entity, etc.) as shown in the table above. The list below provides an explanation of each type of engagement we intend to carry out:

1. Presentations: This will be split up into briefings and conferences and will take the form of informative presentations explaining what we are doing. We will make use of events held by representative groups, where possible, e.g. Distribution Code Review Panel and Generator Connections Liaison Group (GCLG), and present at these events.
2. Workshops: This will take the form of informative workshops explaining what we are doing but more interaction and two way communication will be required. We will approach this

type of Stakeholder Engagement by informing Stakeholders and requesting ideas/feedback by encouraging discussion and debate.

3. Consultations: This will be split up into online public and private consultations and a final public consultation.
  - a. Online: This will be split up into public and private/targeted consultations, both of which will be informative, explaining what we are doing and requesting ideas/feedback in the form of a survey questionnaire, e.g. by using the survey monkey service.
  - b. The Final Public Consultation will be open to everyone to participate in.

Table 2 illustrates how we intend to engage with each Stakeholder Group.

*Table 2: Method of Engagement for each Stakeholder Group*

Method of Engagement						
Group Number	Presentations		Workshops	Consultations		
	Briefing	Conferences		Online Targeted	Online Public	Final Public
1	✓	✓	✓		✓	✓
2	✓	✓	✓	✓	✓	✓
3	✓				✓	✓
4	✓	✓			✓	✓

### 4.3. Identifying themes to discuss with Stakeholders

An important part of the Stakeholder Engagement process is to identify themes to discuss with Stakeholders and to ensure that these themes include issues that are important to customers. Stakeholders should also be given the opportunity to highlight any other issues of importance which have not been identified by ESBN.

The following list shows the themes identified to discuss with Stakeholders.

1. Security of Supply
  - a. Network reliability / Security of Supply
    - i. Frequency of power outages
    - ii. Duration of power outages
    - iii. Flexible Connections
2. Willingness to pay - test what our customers most value
  - a. The level of reliability customers expect
  - b. Customers to identify specifically which, if any, initiatives or service improvements are valued sufficiently that they would be prepared to fund them
  - c. Customers to identify where a reduction in service could be tolerated in exchange for a lower cost to them
3. Flexibility of Supply
  - a. Demand
    - i. Access, e.g. timed or variable access connections

- ii. Demand response provision
  - b. Generation
    - i. Access, e.g. timed or variable access connections, Active Network Management Systems
    - ii. Curtailment – how could it work?
    - iii. Data required to assess project viability
4. Other projects or trials that Stakeholders are aware of or any successful trials that have been transferred into ‘Business-As-Usual’ in the industry
5. Any other issues with existing ESN Planning Standards that Stakeholders wish to highlight

#### 4.4. Record, Assess and Respond

Another important part of the Stakeholder Engagement process is to record, assess and respond to the issues highlighted by our Stakeholders.

We will aim to:

1. Record all the issues highlighted by Stakeholders.
2. Consider all issues and assess how to address them.
3. Be transparent and provide feedback to Stakeholders. It is crucial that ESN is explicit about how Stakeholder views have been dealt with. If it is not possible to address concerns raised, ESN should provide reasons for this. This will be important to ensure continued Stakeholder participation.
4. Record the key findings from our Stakeholder Engagement to facilitate knowledge transfer and ensure the value of engagement is not lost in the future.

#### 4.5. Lessons learned from other Stakeholder Engagement

In order to inform the optimum Stakeholder Engagement approach to be taken by ESN in this project, a review of the approaches undertaken by DNOs in the UK has been carried out.

As part of the Distribution Price Control Review 5 (DPCR5) in the UK, OFGEM set out an expectation that DNOs should consult with their regional Stakeholders, to secure their involvement in the DPCR5 process, allowing their views to be considered as part of the development of the business plan. It is noted that the lessons learned by OFGEM’s assessment<sup>3</sup> of the approaches to Stakeholder Engagement adopted by the DNOs show that:

- Consultations require a six week consultation period to be of most benefit
- Workshops were most successful where parties had already read the materials prior to attending with material sent out two weeks ahead of the workshop

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<sup>3</sup> Electricity distribution price control review policy paper - supplementary appendices, OFGEM, December 2008, available from:  
<http://www.ofgem.gov.uk/Networks/ElecDist/PriceCntrls/DPCR5/Documents1/POLICY%20PAPER%20APPENDICES.pdf>

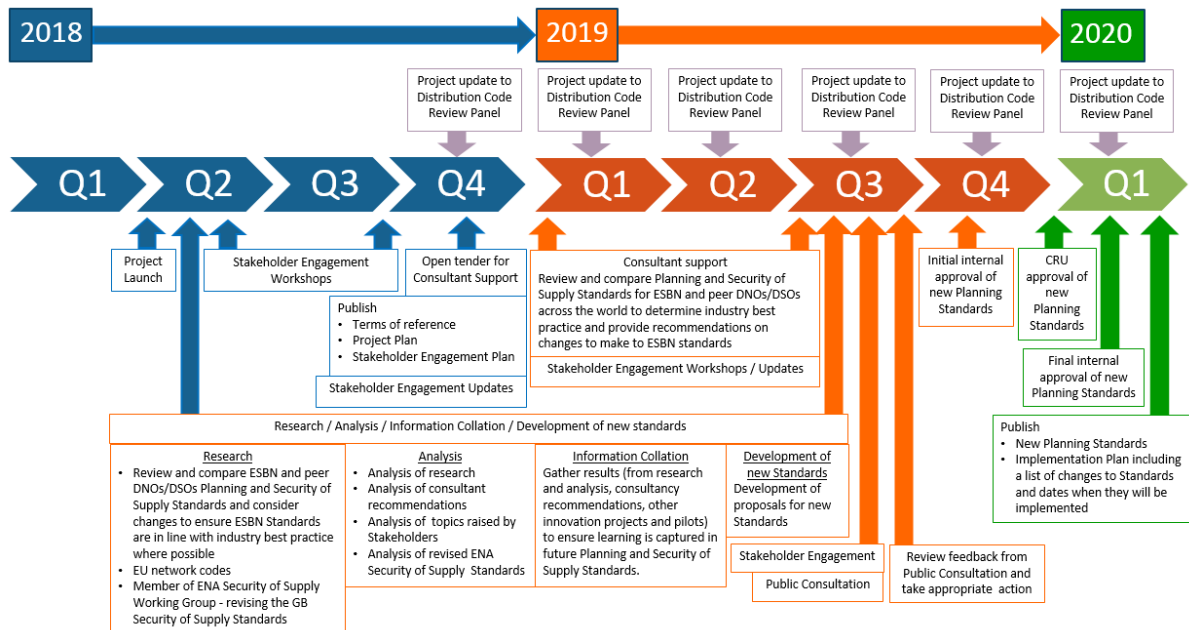
- Stakeholders required an explanation of the issues to facilitate useful discussion
- There was benefit in consulting with Stakeholders using costed options as this allowed Stakeholders to better consider the issues in context
- Business customers were difficult to engage - a more successful approach might be to contact them via trade bodies, e.g. IDA and IBEC

Due consideration will be given to the points above in the design and conduct of the ESN Stakeholder Engagement Plan for the Planning Standards Review Project.

## 5. Next Steps

Figure 1 illustrates the proposed project timeline with key milestones highlighted. This plan may change over time as the project progresses.

Figure 1: Project timeline with key milestones



There will be Stakeholder Engagement workshops and meetings scheduled throughout the project. They will be held regularly throughout the project to ensure continuous Stakeholder Engagement and communication and to keep Stakeholders up-to-date with our proposals. All Stakeholders are invited to attend and actively participate in Stakeholder Engagement workshops or meetings. Other Stakeholders who have not specifically been identified by ESNB are welcome to participate in Stakeholder Engagement.

The ESNB Planning Standards Review Team will operate an ‘open-door’ policy and encourage Stakeholders to approach the Review Team throughout the project if they wish to highlight any issues or put forward topics for exploration for the Planning Standards Review. The intention of how the open-door policy will work is shown below:

- The Review Team will invite Stakeholders to submit feedback/ideas in the form of a written submission to the Review Team
- The Review Team will allocate dedicated timeslots where Stakeholders will have the opportunity to make an appointment to discuss their feedback / ideas with the Review Team. These meetings may be one-to-one meetings or they may be in groups, depending on Stakeholder uptake.

## Derogations

No Derogations are recorded against the Requirements of this document.

## Terms & Definitions

For the purposes of this document, the following terms and definitions apply.

*Table 3: Terms & Definitions*

Term	Definition
Shall	Designates a Company Requirement, hence conformance is mandatory.
Should	Designates a Company Recommendation where conformance is not mandatory, but is recognised as best practice.
May	Designates a Permissive Statement - an option that is neither mandatory nor specifically recommended.