

## **PUBLIC CONSULTATION ON STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN 2021**

**Document Number: DOC-221220-SEP**

**Irish Solar Energy Association response**

### **INTRODUCTION**

The Irish Solar Energy Association (ISEA) appreciates the opportunity to respond to ESB Networks' "Stakeholder Engagement Strategy and Plan 2021" consultation. The stated commitment towards the integration of stakeholder views into decision making and network management is very welcome.

ISEA is the leading voice for the Irish solar industry. The association works to advance a policy and regulatory landscape promoting solar PV as a leading technology that can assist in the decarbonisation of Ireland's electricity system and contribute to a successful and resilient clean economy. ISEA is committed to delivering 5 gigawatts (GW) of solar PV in the next ten years. ISEA has a membership of 109 businesses currently active in the Irish solar market.

ISEA's members have engaged with ESB Networks around the delivery of grid connections for both grid scale and behind the meter assets; that experience has informed our response. We are favourable towards the overall approach, though we are suggesting a number of changes to working practice that are intended to give effect to the objectives of the stakeholder strategy.

### **ESB NETWORKS' 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.

### **POTENTIAL IMPROVEMENTS**

ISEA recognises that stakeholder engagement is a continuous process of improvement, and the current status quo is not the finished state. With that in mind, we are proposing some revisions which we as customers feel may improve future practice.

#### **Clarity on influence of stakeholder engagement**

As the document notes, evidence of collaboration and showing how stakeholder feedback has shaped decision making is linked to high quality engagement processes, helping to build the faith of stakeholders in the process. ISEA's experience suggests that while ESB Networks external delivery of its message has been enhanced, there is room for improvements in the incorporation of feedback.

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 more structured approach to follow up communications where feedback has been solicited would be welcome.

### Smart grid delivery - firmer metrics and timelines

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-Q4) consultation period on Active System Management with limited detail on delivery.

We are very welcoming of initiatives such as Lean Connections, Non-Firm Access, Non-Wires Alternatives. The specific success metrics and defined outputs around these projects are currently unclear. Communications with greater specificity on these deliverables and their impact on connection costs and timelines would engender industry confidence.

### Delivery certainty

The DSO is a fundamental delivery body in the decarbonisation of the electricity supply facing a diverse and challenging agenda. Where there are challenges on timeframes or constraints on delivery, the DSO could communicate those in a more upfront manner to stakeholders.

Experience across a range of projects (whether RESS projects, or export connections for microgeneration assets) suggests that there could be greater certainty attached to the timing estimates provided to customers.

### Cross-stakeholder engagement

As the RESS-1 projects move into delivery phase, project owners often have to engage with ESB Networks, EirGrid and the CRU to resolve issues that arise. It can be time inefficient to move between those organisations and usually multiple interactions are required. This issue can be compounded if it occurs on a number of projects, creating a resource drain for all organisations involved. ISEA would strongly favour a cross-body forum for resolving just these kinds of matters, for example resuscitating the Generator Connections Liaison Group.

## CONCLUSION

ISEA welcomes ESB Networks general approach towards increasing stakeholder engagement. The above proposed improvements are intended to enable the objectives of the stakeholder strategy.

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