



Annual Electricity Transmission Performance Report 2023 and Investment Planning & Delivery Report 2023

Summary of Responses to Consultation

30th September 2024

1. Introduction

This paper summarises the feedback received by EirGrid and ESB Networks, in their respective capacity as Transmission System Operator (TSO) and Transmission Asset Owner (TAO), to the public consultation on the Draft 2023 Annual Electricity Transmission Performance Report (APR) and Draft 2023 Investment Planning and Delivery Report (IPD) which ran from 16 August 2024 to 13 September 2024. Each year, these reports provide customers, industry participants and other interested parties with a clear, accessible, comprehensive, quantified but non-technical account of performance in the preceding year.

The consultation sought the views of customers and stakeholders on the draft reports in advance of their finalisation. The TSO and TAO believe that consultation and engagement are core and essential business activities. They provide stakeholders with the opportunity to participate in a meaningful way and help the TSO and TAO understand and where possible incorporate or address stakeholders' comments.

2. Background

The Commission for Regulation of Utilities (CRU) decision paper [PR5 Regulatory Framework, Incentives and Reporting](#) (CRU/20/154) sets out the requirement for the TSO and TAO to publish the APR and IPD on an annual basis for the PR5 period, 2021 to 2025.

The TSO and TAO are required to jointly prepare and publish a summary annual performance report, the APR, documenting how their activities and behaviours over the previous calendar year have delivered outputs relevant to the needs of customers, market participants and other stakeholders.

The TSO and TAO are required to jointly prepare an annual investment planning and delivery report, the IPD, a high-level summary report designed to provide an overview of the transmission development programme in the previous calendar year and how the six-step process for grid development worked by reference to projects in that period. This report is intended to be a companion document to the APR. In developing the 2023 reports, the TSO and TAO were cognisant of this requirement and the criteria set out in Annex 2 of CRU/20/154.

3. Related Documents

Documents published as part of this consultation:

[Draft 2023 Annual Electricity Transmission Performance Report](#)
[Draft 2023 Investment Planning and Delivery Report](#)

Final reports for 2022:

[2022 Annual Electricity Transmission Performance Report](#)
[2022 Investment Planning and Delivery Report](#)

Relevant CRU decision paper:

[CRU/20/154 -PR5 Regulatory Framework, Incentives and Reporting](#)

4. Responses to the consultation

The TSO and TAO received one submission from SSE in response to the consultation. We would like to thank SSE for their response.

Having reviewed the consultation response received in detail, the TSO and TAO do not propose to make changes to the current draft of the APR and IPD for 2023.

The following consultation question was asked:

- With respect to the draft reports, are there areas within the reports that you feel require more detailed information?

We set out below our responses to those comments which are in scope.

Comments Received

SSE Submission

“It is our view that stakeholders would gain greater benefit from increased transparency in respect of planned transmission asset project delivery during 2023. In our view just knowing the expected number of projects to be completed as well as the number of projects that have been completed does not provide sufficient understanding of how well EirGrid and ESB Networks has performed over the year.

The performance report should clearly set out the timeline (in months) for how each project, that has been delivered within the year, performed against its original baseline programme for delivery (currently PR5). The current drafting does not provide sufficient information such that the reader can determine if the projects expected to be delivered within the year were the actual projects reported as being delivered in that year. Provision of such relevant information would afford EirGrid ESB Networks the opportunity to demonstrate where they have outperformed (or under-performed) against the original baseline programme estimate.

Stakeholders would also benefit from understand the rationale for any differentiation in performance. This would enable stakeholders to understand if the projects delivered within the year are the same projects that were expected to be delivered. Based on the information provided in these reports this is difficult to determine.

Where this information is already publicly available and clearly signposted, we would recommend that these reports contain the specific links to the relevant publications.”

EirGrid & ESB Networks Response

The current Infrastructure reporting framework, established under CRU/20/154, provides a robust structure for transparency and accountability within PR5. This includes the quarterly Network Delivery Portfolio (NDP), the Joint Annual Performance Report, and the Joint Annual Investment Planning and Delivery Report, which collectively offer a detailed view of the infrastructure development and delivery performance and the network capital expenditure allowance.

The objective of the NDP is to deliver on the TSO and TAO strategies to transform the power system by 2030 in accordance with Government 2030 targets and Climate Action Plans. We do this by providing a clear and transparent programme over multiple years which maximises the amount of project related work that can take place to reinforce the system, connect customers and deliver the required level of maintenance of the transmission system while ensuring a safe and secure system. The priority projects and work programmes that the TSO and TAO are implementing annually to deliver upon the 2030 targets are included in the NDP.

While further improvements regarding the detail and transparency in the current structure and format of our reporting is continuing to evolve, it is also felt that direct engagement with industry is the best way to address the issues and risks raised. One-to-one meetings with TSO project teams are offered to TSO and DSO generator customers. These meetings provide an opportunity for TSO customer representatives and TSO/DSO contract management teams to discuss the specific progress and performance related to delivery of their projects and related transmission reinforcement works. This also provides the best opportunity to directly address specific concerns which arise.

Recently, the TSO and TAO have engaged with renewable representative bodies to provide extensive briefing on the pace of delivery necessary, the associated risks and externalities and the capabilities of EirGrid and ESB Networks to deliver the new transmission infrastructure required to achieve our electrification and decarbonisation targets. The TSO and TAO will continue to work closely with stakeholders to understand and manage the externalities which impact the PR5 programme. Further detail on the risks and externalities affecting the PR5 programme are outlined in Section 4.2 of the Investment, Planning and Delivery (IPD) Report.

As we approach the PR6 period, the network companies will review the current structure and format of our annual infrastructure related publications. We will review the noted annual publications to ensure that the realised infrastructure portfolio benefits and outcomes are highlighted with reference to plans. The TSO and TAO will continue to work with our stakeholders to achieve high quality and consistency across our reports and work towards integrating digital enhancements to the joint reporting framework.