

TSO PR5 Local Security of Supply

PR5 Incentive Multi-Year Plan
2025-2029

1st October 2024

Status: Final



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1 Introduction and Context

The Local Security of Supply (LSoS) multi-year plan 2025-2029 identifies the infrastructure, markets, and operations aspects, identifying actions and activities that EirGrid will undertake during the period to contribute to the resolution of security of supply issues in the greater Dublin region. The development of the plan has taken place within the context of policy decisions and processes as outlined in the following sections.

Following feedback from the CRU, EirGrid's LSoS multi-year plan 2025-2029 has been set out based on the following three areas:

1. Infrastructure
 - a. Major Project Delivery including the Dublin Programme
 - b. Stakeholder and Public Engagement
 - c. Planning and Environment
2. Market
 - a. T-3/T-4 TSO Non-Contestable Project Delivery
 - b. An update into the Investigation of short circuit levels in Dublin
3. Operations (including Demand)

In Section 7.11 of CRU/20/154, the CRU highlighted the importance of resolving local security of supply issues within its PR5 Strategic Objectives. CRU/20/154 states that given the significant forecasted growth in demand in the greater Dublin region, constraints in the Dublin Region represent a security of supply risk.

This incentive plan is aligned with CRU's strategic aim to remove the Dublin constraints and to ensure that the electricity supply to Dublin would not be materially impacted by the loss of generation in the Dublin area. Delivery of the metrics relating to the LSoS aspects in this MYP will be a major step forward in achieving the overall security of supply objective in the region.

1.1 Price Review 6

The Price Review 6 period commences in 2026 and concludes at the end of 2030. The TSO will prepare and make a detailed Network Capex submission to the CRU before the end of 2024; therefore, the development of this multi-year incentive plan takes place within the context of the development of the broader PR6 programme and submission process.

It is therefore not considered prudent to make specific programmatic commitments for PR6 without firstly considering the alignment with the strategic elements of the future PR6 submission. For the avoidance of doubt, the TSO will continue to progress existing plans (including existing project milestones) to promote the wider aims of this incentive and to deliver the efficiencies expected by consumers and industry.

1.2 Quantification Methodology - Status Update

The CRU's PR5 2022 Balanced Scorecard Information Paper ([CRU2022989](#)), published in December 2022, set out the detailed LSoS Balanced Scorecard Requirements and Incentive Allocations for 2022. This included 2 new aspects, Quantification, and Identification. The required evidence for each of these aspects was noted as - *“Development and description of a methodology for quantifying the security of supply issues and the quantitative impact of remedies/actions.”*

In the CRU's PR5 2023 Balanced Scorecard Information Paper ([CRU202354](#)), published in June 2023, the CRU restated the need for EirGrid to *“develop a methodology to quantify the security of supply issues and utilise the methodology to report on the impact each infrastructure project is likely to have on resolving security of supply constraints.”*

In the CRU's PR5 2024 Balanced Scorecard Information Paper ([CRU202405](#)), published in March 2024, the CRU stated that *“As with the previous year's requirement, the CRU expects EirGrid to develop a methodology for quantifying the local security of supply issues and the quantitative impact of each action proposed and implemented.”*

EirGrid engaged with the CRU in 2023 in relation to this issue. EirGrid has made every effort to take cognisance of the outcome of those discussions and has provided extensive further detail to the CRU in relation to the quantification aspect of the 2023 Balanced Scorecard for this incentive in the Outturn Performance Report for 2023, submitted to the CRU in April 2024. At time of writing, whilst the CRU's decision paper in relation to EirGrid's outturn incentive performance for 2023 is yet to be published by the CRU, EirGrid is aware that the CRU levied a significantly material penalty for this aspect of this incentive for 2023.

EirGrid confirmed in 2023 that it is not appropriate or practical to develop a single standalone methodology specifically for performance evaluation purposes for this incentive, whereby a single standalone numeric comparable metric could be attributed to *“each action proposed and implemented”*. EirGrid has, in accordance with Condition 15 of its TSO licence, developed a robust set of standards, the Transmission System Security and Planning Standards (TSSPS)¹ which are applied to ensure the planning and development of a secure, reliable, economical, and efficient transmission system. The 'quantification of security of supply' is the outcome of the TSO applying the Transmission System Security and Planning Standards (TSSPS) and this considers multiple of technical criteria. These standards, which have CRU approval and are publicly available, are used to establish and identify the technical scarcities or needs that form the basis for the investment decisions required to develop the transmission system.

Comprehensive processes are in place to ensure that EirGrid, as TSO, is compliant with its statutory and licence obligations in the context of security of supply across the transmission system, of which the transmission system in the Dublin Region is a sub-set. These processes have been employed in EirGrid's determination of the infrastructure delivery proposals set out in this plan for the Dublin region. In addition, as part of the outturn report for 2023, EirGrid provided a tabulated description listing the technical scarcity driving the need for each of the infrastructure projects under this incentive and the impact and benefit each of the projects have on the 'security of supply' issue when finally delivered.

¹ [EirGrid-Transmission-System-Security-and-Planning-Standards-TSSPS-Final-May-2016-APPROVED.pdf](#)

EirGrid notes the following CRU commentary in [CRU202405](#) in this context - *“The overarching goals and rationale for this is that some means of assessment of the TSO as to whether a) we are moving closing to achieving the ultimate goals of LSOS as set out in CRU 20154 and b) whether the TSO plan is representing value for money for the consumer.”* In separate feedback from the CRU in relation to performance assessment for this incentive for 2023, we note the CRU’s acknowledgement of *“the inclusion of some high-level information on the TSOs approach”* in our outturn performance report. In 2025, EirGrid proposes to workshop this issue with the CRU, in an attempt to clearly understand the CRU’s expectations in relation to this issue.

1.3 Stakeholder Feedback

EirGrid as Transmission System Operator (TSO) published a call for input consultation paper on 12th July 2024² seeking interested parties’ views on and input into the TSO’s Local Security of Supply multi-year incentive plan 2025-2029. The consultation remained open until 16th August 2024.

We would like to take this opportunity to thank and acknowledge the inputs and constructive feedback of the consultation respondents. The TSO notes that some comments submitted related to matters of policy and areas which are outside the scope of the aims and objectives of this incentive.

1.3.1 Consultation Responses

Responses to the consultation were received from four organisations which are listed below:

1. Bord Gáis Energy (BGE)
2. Bord na Mona (BNM)
3. Energia
4. EP UK Investments

The comments received which are relevant to this multi-year plan and the TSO responses are documented in **Appendix 1**.

² <https://cms.eirgrid.ie/sites/default/files/publications/PR5-TSO-Multi-Year-Plans-2025-2029-Call-for-Input-Consultation-Paper.pdf>

2 Local Security of Supply - Aspects of the Plan

This incentive has a specific focus on the initiatives and solutions that refer to security of supply challenges in the greater Dublin region, but by its nature, the topic of security of supply relates to the entire power system. This definition of the ‘local’ security of supply challenges inevitably interacts with the mechanisms and initiatives that were designed to apply to the entire power system. In this plan we have therefore highlighted the activities, mechanisms and initiatives that serve the entire power system but that also demonstrate EirGrid’s efforts to resolve the Local Dublin security of supply issue as per the aim of this incentive.

Security of supply is the ability of the transmission network to reliably transport electrical energy from the generators where it is generated to the demand centres where it is consumed. Security of supply is also concerned with the reliability of the transmission network and EirGrid plans for the timely development of the transmission network to maintain an acceptable level of performance and reliability, thereby ensuring that transmission network performance is not a barrier to economic development. The following sections outline the LSoS initiatives and solutions for each of the aspects that EirGrid is progressing during the period of this multi-year plan 2025 - 2029.

2.1 Infrastructure Aspect

2.1.1 Major Project Delivery including the Dublin Programme

A key enabler to the security of supply and the renewable energy capacity in the Dublin area is an integrated programme of works to transform the Dublin Area transmission network. This group of projects is called the Dublin Programme and will involve the installation of up to 120 km of cables across the city, through five cable (CP1100, 1146, 1150, 1157, 1216), and six station projects (CP1190, 1213 and 1251) including the 3 Bulk Supply Point³ (BSP) projects (CP1214, 1226 and 1273). CP1214 and CP1226 have been renamed in 2024 ahead of the initial Public consultation during Step 3, the reference to BSP was replaced with Grid Reinforcement as it was felt that this would be more meaningful to the public and better reflects the broader grid upgrade requirement.

The number of projects within the Dublin programme will continue to evolve as the programme progresses during PR5 and PR6. EirGrid has included 13 transmission infrastructure projects in this Local Security of Supply multi-year plan, 11 projects from the Dublin Programme as stated above and two additional major projects in the greater Dublin region (CP0966 and CP1021). The relevant milestones for this LSoS incentive plan of Capital Approval, Project Agreement and Energisation are the major project milestones which are contained in the TSO’s Q2-24 Network Delivery Portfolio (NDP). The NDP is published on the TSO’s website⁴ and is required as per Section 3.2 Capex Monitoring of CRU/20/154. See also Appendix 2 of this document for further relevant milestones and activities which are applicable for 2025 and 2026.

³ A Bulk Supply Point (BSP) station is a point of connection between the transmission and distribution system. A primary function of these BSP stations is to facilitate power flows between the transmission and distribution systems to enable power to be distributed to where it is needed.

⁴ <https://www.eirgridgroup.com/customer-and-industry/general-customer-information/network-delivery-portfolio/index.xml>

The Security of Supply needs are best described in the context of these LSoS MYP projects, the benefits these projects bring and considering the projects' drivers and needs. EirGrid launched its "Powering Up Dublin" programme in May 2022⁵ with the establishment of the Dublin Infrastructure Forum and continues to progress a major programme of engagement with stakeholders throughout the period of this MYP.

The Dublin programme will:

- replace and upgrade older infrastructure that is reaching the end of its life.
- help ensure the security of supply in the Dublin region.
- meet the growing demand for electricity from growing social and economic activity.
- facilitate renewable electricity, specifically offshore capability (being 'offshore ready'); and improve the overall resilience of the power system.

The multi-year plan refers to the major NDP project delivery milestones and activities for each of the projects as they are known. These milestones will continue to be developed as the programmes and the individual projects progress and will be reported on in the TSO's quarterly NDP publications and in our outturn reporting as part of the incentive.

2.1.2 Stakeholder and Public Engagement

The TSO has a commitment to meaningful stakeholder and public engagement, which is embedded across the company and forms part of the TSO's core strategy. This applies to all its grid infrastructure development, both urban and rural, including the Dublin Programme and major projects in the Greater Dublin region. The Dublin Infrastructure Forum is comprised of Local Authorities, Government Departments, State and Semi-State organisation and agencies who deliver strategic infrastructure in the Dublin region and the purpose of this forum is to ensure a collaborative, joined up approach to major project delivery across Dublin. The Powering Up Dublin Community and Business Forum also brings together people and organisations from across the project area so that stakeholder, community views and views of local businesses can be discussed, understood, and properly considered throughout the lifecycle of the project.

For this metric, the TSO will assess annually the Stakeholder and Public Engagement activities undertaken against those which were planned. These activities will consist of regular forum meetings with a range of stakeholders, project specific consultations and regular documented updates on the progress of the Dublin Programme and projects in the Greater Dublin Region.

This will include an update on the activities such as:

- Dublin Programme Infrastructure Forum update from quarterly meetings
 - The Dublin Infrastructure Forum (DIF) will continue to meet on a quarterly basis throughout 2025. The DIF was initially set up to engage and collaborate on the cable replacement programme, however it has evolved to cover other projects that EirGrid has in the Dublin Area. We will continue to utilise the unique opportunity for collaboration and engagement presented by the DIF as Grid Reinforcement projects commence in Dublin and the surrounding counties.
- Community Forum updates from quarterly meetings

⁵ https://www.eirgridgroup.com/_uuid/9fe9d891-469f-493b-8e60-eab2089c6f80/EirGrid-Powering-Up-Dublin-Web-Final.pdf

- The Community Forum will meet 3-4 times in 2025, providing input into both the cable projects and the Central Dublin Substation Project. The membership of the Forum will expand to ensure that all areas of the city where EirGrid is proposing infrastructure are represented. The Forum will also begin to feed into Community Benefit planning.
- Business Forum updates from quarterly meetings:
 - The Business Forum will meet 3-4 times in 2025, providing input to both the cable project and the Central Dublin Substation Project.
- Project specific engagements in line with the individual project timelines set out:
 - Cable replacement programme - publication of 4B report for two Inchicore to Poolbeg cables (CP1150 and CP1157) to present the best performing options for both cables which shows further refinement from Step 3. This will involve an information campaign and public information events in early 2025.
 - Fingal to East Meath Grid Reinforcement (CP1214) - publication and public consultation on Step 4 route options report in early 2025.
 - Kildare Dublin Grid Reinforcement (CP1226) - public consultation on the best option and the area that may be affected (Step 3 activities) will take place and a community forum will be established in 2025.

2.1.3 Planning and Environment

Infrastructure Delivery occurs within a strategic and statutory planning and environmental context, where the focus is on matters of proper planning and sustainable development. As such, timely achievement of planning and environmental milestones forms a vital part of ensuring the progression of these projects.

For this metric, the TSO will assess its timely achievement of the following key planning and environment processes as they relate to relevant LSoS projects listed in the Q2-24 NDP.

This will include a combination of the activities such as:

- Pre-application consultations,
- Declarations of exempted development and/or,
- Planning applications in line with the specific projects.

CP No.	Project Title	Milestone 2025	Milestone 2026
CP1146	Carrickmines - Poolbeg 220kV Cable Replacement	Step 5 - Development of planning application for offshore cable section.	GW5: Submit planning application in 2026 (following the marine site investigation programme)
CP1216	Poolbeg - North Wall 220kV Cable Replacement	GW5: Submit planning application for River Liffey cable crossing	GW6: Approval to Enter Project Agreement as per Q4-24 NDP.
CP1273	Dublin Central Bulk Supply Point (BSP)	Progress will combine Step 4 and 5 leading to GW5 in Q3 of 2025.	GW6: Approval to Enter Project Agreement Q4 of 2026.

Table 1 - Specific planning milestones

Regarding CP1146 Carrickmines - Poolbeg 220kV Cable Replacement and CP1216 Poolbeg - North Wall 220kV Cable Replacement, in order to safeguard the overall delivery programme EirGrid and ESBN are working collaboratively through the early engagement process to initiate works on the

onshore sections which will be exempt from planning whilst the offshore sections are subjected to the new Maritime Area Regulatory Authority (MARA) consenting regime and statutory planning approvals. This has the overall effect of contributing to the de-risking of the delivery schedule and providing greater certainty of achieving the overall project objectives and energisation targets in advance of 2030.

2.2 Market Aspect

This aspect concerns the adequacy of generation and how to identify, quantify and procure the right amount of generation for the entire power system on the island of Ireland. The following subsections describe the delivery milestones related to the aspect of Generation and Market initiatives and solutions under the wider topic of local security of supply for greater Dublin. It should be noted that some of the tasks under the Generation and Market initiatives and solutions aspect are directly linked or overlap with some of the other aspects of security of supply so need to be understood within the context of the other aspects.

2.2.1 Deliver T-3 / T-4 Non-Contestable Projects

The T-4 and T-3 Capacity Auctions conducted by SEMO (Single Electricity Market Operator) have contracted a total of circa 700MW in Dublin region of predominantly thermal energy for delivery between October 2024 and March 2028. The role of EirGrid in these Capacity Auctions is to assess the technical suitability of pre-qualification applications for connection to the transmission network. Applicants that make it through the pre-qualification stage and are successful in the Capacity Auctions will then receive a grid connection offer from EirGrid. These projects are at various stages of their development and, once completed, will contribute to meeting demand in Ireland as well as helping to alleviate local issues in Dublin.

These successful projects have participated in a number of capacity auctions, with each auction covering a specific capacity year for when the generation is required to be available. In the recent capacity auctions, we have procured ca. 700 MW of this generation in the Dublin area (as per table 1 below). Gas based conventional generation makes up all of this capacity. Most of these successful connections will have non-contestable elements of their projects which will have to be delivered through the normal TSO/TAO delivery mechanism. Table 2 Summarises the projects located in Dublin that have been successful in the T-3/T-4 processes. These projects have connection agreements for connections into the TSO operated 110 kV and 220 kV network.

Capacity Auction	CP No.	Proposed Connection Point	Quantity [in MW]	Technology
T-3 24/25	CP1256	Baldonnell 110 kV	100	Conventional
T-3 24/25	CP1257	Kilshane 220 kV	293	Conventional
T-4 26/27	CP1425	Poolbeg 220 kV	295	Conventional
			Total: 688	

Table 2: Summary of T-3/T-4 projects that have been successful in Dublin in capacity auctions and are seeking to connect over the coming years.

From the table above 100 MW will be connected in 2025, ca. 300 MW in 2026 and an additional ca. 300 MW expected in 2026/27. These projects will contribute to meeting demand in Ireland as well as helping to alleviate any local issues in Dublin.

The third-party non-contestable elements of the projects have delivery risks that are heavily influenced by the customers, such as the ability to achieve planning consents for the generation facility and grid infrastructure and procurement of the generation materials within a constrained market. Another project risk is the ability of the TSO to provide the required outages for the connections. These risks may influence the ability of EirGrid to deliver for this part of the incentive. EirGrid is closely monitoring the progress of these projects to track their delivery and identify the risks of meeting energisation dates.

The T-3 and T-4 projects referred to above will improve security of supply to the Dublin region, supporting the balancing of generation capacity and demand. For each project some further detail on the impact on the security of supply will be discussed within the outturn reporting as requested by CRU.

2.2.2 Investigate short circuit levels in Dublin

Short circuit current/fault levels in the Dublin region could at times be high during certain operating conditions in the future if no mitigations are implemented. This is specifically true if further generation was to connect into the Dublin region. High short circuit levels are a safety concern and will have to be addressed either with operational measures or with more permanent solutions. To take account of this technical concern, in the Capacity Auctions, where the generators must connect within a timeframe of approximately four years, restrictions have to be introduced into the Capacity Remuneration Mechanism (CRM) that determine the generation quantities in the Capacity Auctions. This results in the minimum required Locational Capacity Constraint (LCC) and maximum allowed generation capacities in Dublin being practically the same in the CRM. This essentially sets a ceiling on the maximum allowed generation in Dublin. This has been discussed with both the CRU and SEM Committee in the context of the T-4 Capacity Auctions and the concern was first raised in relation to the 2026/2027 capacity auction.

Given these concerns, in 2024 the TSO investigated the technical scarcity (need) related to short circuit current/fault levels in the Dublin region. This investigation considered the planned new generation portfolio and new technologies in Dublin region, including new conventional thermal generation, offshore wind generation and storage solutions such as batteries. The analysis also considered a range of operational situations whereby demand is met from a variety of generation dispatches made up of conventional generation (e.g. gas turbine/power plant) and inverter-based sources (e.g. offshore wind generation, solar generation, and batteries). The review also considered the impact of new inverter-based technologies short-circuit level, as there has been some uncertainty regarding their short circuit contribution during faults, which is a fundamental assumption in any analysis.

Given the level of challenge and complexity in addressing the short circuit levels in Dublin, the investigation and analysis process will involve a multi-year timeframe. In 2024, the TSO engaged with, and gathered information from, relevant developers and equipment manufacturers to ensure our assumptions and models for the new connections and technologies accurately reflect their short circuit contribution during faults. Based on the information gathered, an indication of the scale of the technical scarcity arising will be known and appropriate solutions can be identified.

The CRU's PR5 2024 Balanced Scorecard Information Paper (CRU202405) published in March 2024, requested two reports from the TSO regarding the short circuit levels in Dublin. An interim report

was provided to the CRU, in accordance with CRU202405, by the TSO in June 2024 and the final report will be furnished by end 2024. It is this final report that will determine any appropriate solutions and key tasks required to progress any solution. As this final report and its conclusion is not yet determined at the time of writing of this Multi-Year Incentive Plan 2025 - 2029, it is difficult to predict what tasks/deliverables should form part of next year's plan.

The detail in the final report may result in various outcomes, including potential mitigations to the identified problems or the requirement for further system analysis to further investigate the technical scarcities. If the analysis identifies infrastructure-based solutions or mitigations, these may then be transferred into the infrastructure aspect of this plan to follow our six-step process for developing the grid. Infrastructural solutions to the high short circuit issues in Greater Dublin typically have a long lead time, e.g. delivery of 220 kV or 400 kV circuits to provide more network that allows for sectionalising of the network, or connection of new generation to new 400 kV nodes or moving existing generation to 400 kV voltage level rather than 220 kV voltage level. It is important to note that the progression with any proposals/next steps will likely be dependent on regulatory decision making in relation to funding and/or applicable policy where relevant.

2.3 Operations and Demand Aspect

2.3.1 CRU's Security of Electricity Supply - Programme of Actions

[CRU/21/115](#), the CRU's Security of Electricity Supply - Programme of Actions Information Paper was published in September 2021. In this Information Paper, the CRU provided an update on security of supply and set out a programme of actions that the CRU is undertaking to ensure security of supply in the context of the generation adequacy/system security requirements in Ireland in the coming years, in co-operation with EirGrid, DECC, the energy industry, and other stakeholders.

[CRU/21/115](#) also includes actions to enhance the responsiveness of existing Demand Side Units in the SEM and develop additional demand side capacity, including accelerated deployment and optimised usage of batteries, and greater demand side response more generally. EirGrid is committed to delivering the actions as set out in [CRU/21/115](#) and mitigating Ireland's security of supply issues continues to be EirGrid's top priority. Electricity Security of Supply Programme of Work Updates were published by CRU in June 2022, February 2023, October 2023, and April 2024 [here](#). This aspect of EirGrid's LSoS plan is significantly informed by the initiatives involving EirGrid as set out in the CRU's Programme of Actions.

2.3.2 Delivery milestones in 2025 plan

For 2025, as evidence of progress made in relation to this aspect, the TSO will produce a report for issuance to the CRU as a subset of the LSoS incentive outturn performance report for 2024 that documents:

1. Progress made in supporting CRU in updating the national electricity crisis scenarios and the updated Risk Preparedness Plan (RPP) for Ireland, including demand reduction under mitigation measures.
2. The status of engagements with energy sector stakeholders related to emergency preparedness (CRU, DECC, GNI, ESNB, NORA).

3. The status of engagements with data centres in preventing and mitigating electricity crises pursuant to the RPP, including:
 - Progress made in addressing run-hour limitations related to particulate emissions under the Industrial Emission Directive (IED) licenses from the EPA.
 - An estimate of the volume of demand reduction available for Mandatory Demand Reduction when the system enters Emergency State.
 - An estimate of the volume of demand reduction under Voluntary Demand Reduction that may be provided by data centres when the system is in Alert State.
 - An estimate of the volume of flexible demand reduction available to the TSO when the system is in Normal State.
4. TEG and REU unit status, margin calls and dispatch events.
5. Feedback on additional opportunities for flexibility that arise through engagements with stakeholders during the year (e.g. through interaction in relation to the Beat the Peak Initiative).
6. Simulation exercises undertaken to test coordination of the operational, strategic, and crisis communications response between stakeholders.

3 LSoS Balanced Scorecard 2025-2029

The Local Security of Supply (LSoS) Balanced Scorecard 2025-2029 contains three complementary aspects with metrics to demonstrate the TSO's performance in addressing and managing the transmission network security of supply challenges.

3.1.1 LSoS Plan 2025 - 2029 Objectives

The incentive plan for the period 2025-2029 includes the following objectives to deliver upon the strategic aims of the plan:

1. A focus on confirming investment decisions for the Dublin Programme and engaging with communities and stakeholders to progress the appropriate option(s),
2. Bringing the Dublin Programme and the two Greater Dublin Region major projects through the required consenting processes,
3. Advancing the cable and major projects to Project Agreement with ESB Networks. It is at this point that a project moves into the detailed design and construction stages before energisation,
4. Delivery of 700 MW of T-3/T-4 projects (100 MW in 2025, 300 MW in 2026 and 300 MW in 2027),
5. An update on the investigation of Short Circuit levels in the Dublin region where next steps were identified, and
6. Continued commitment to delivering the actions as set out in [CRU/21/115 - Security of Electricity Supply - Programme of Actions](#).

3.1.2 Overview of Multi-Year Plan Metrics

Aspect	Metric	2025	2026	2027 - 2029
Infrastructure	Stakeholder and Public Engagement	<ul style="list-style-type: none"> All Forums operating consistently. Engagement to evolve in response to need and progress. Dublin Programme Infrastructure Forum quarterly meetings Community Forums meeting quarterly. Business Forums meeting quarterly. Project specific engagements in line with individual project timelines Quarterly website/FAQ updates 	Same as 2025.	Based on PR6 Programme Submission & Assessment
	Planning and Environment	<ul style="list-style-type: none"> Complete the process for Declaration of Exempted Development on Best Performing Cable route options. Submission of planning application(s) for those cables (or portions thereof) that are not Exempted. Development Progress remaining consenting requirements. 	Same as 2025.	Based on PR6 Programme Submission & Assessment
	Major Project Delivery Inc Dublin Programme	<ul style="list-style-type: none"> Specific milestones for projects in the Greater Dublin area are displayed in Appendix II of this document. All projects including Dublin related projects are displayed in the Q2-24 NDP as published on EirGrid's website. 	See Appendix II	Based on PR6 Programme Submission & Assessment
Market	T-3/T-4 Project Delivery	<ul style="list-style-type: none"> ca. 100 MW 	ca. 300 MW	ca. 300 MW
	Short Circuit Levels in Dublin	<ul style="list-style-type: none"> Next steps TBD following short circuit level investigation report to be submitted in April 2025. 	Based on PR6 Programme Submission & assessment	Based on PR6 Programme Submission & Assessment
Operations	Operations/ Demand	<ul style="list-style-type: none"> Annual Operations / Demand report summarising activities and progress. 	Same as 2025	Based on PR6 Programme Submission & Assessment

4 Performance Assessment and Incentive Award Scales

4.1 Outturn Reporting

EirGrid will provide an annual Local/Dublin security of supply incentive outturn report to CRU containing its outturn performance. The report will detail the activities which have taken place during the calendar year including the implementation of the incentive plan, the quality of the plan and the benefits and impacts derived from the achievement of specific milestones and activities towards the strategic aims of this incentive.

4.2 Performance Assessment

The total potential upside/incentive award in each calendar year is €1.5 million, whilst the potential downside/incentive penalty is €1 million per annum. Per CRU/20/154⁶, 75% of the annual reward/penalty will be applied annually while the remaining 25% of each years' reward/penalty will be deferred to the end of the Price Review Period (to be assessed after the PR6 Final Determination has been published).

The TSO proposes that the allowed upside be calculated on a linear basis with the quantum of deliverables achieved/milestones reached per calendar year directly related in percentage terms to the allowed upside. The TSO also proposes that the incentive should be weighted as defined in the table below, however it is acknowledged that the applicable weighting will ultimately be a decision for the CRU to be confirmed in a future decision paper and further based on TSO's performance against this incentive plan.

Metric No.	Aspect	Overall Proposed Weighting	Breakdown of Weighting	Annual Allowance Upside (75%)	Annual Allowance Downside (75%)
1	Infrastructure	50%		€0.5625	(€0.375)
a	Stakeholder and Engagement Feedback		5%		
b	Planning and Environment Consents		5%		
c	Projects and their contribution to LSoS		40%		
2	Market	30%		€0.3375	(€0.225)
a	Delivery of T-3/T-4 Non-Contestable Projects		15%		
b	Short Circuit Levels Investigation Report - Update		15%		
3	Operations and Demand	20%		€0.225	(€0.150)
	TOTAL			€1.125	€0.750

Table 3: LSoS MYP 2025 Metric Weightings

⁶ CRU/20/154, section 7.11, page 66.

4.3 Ex Post Adjustment Process

As part of the annual review of the outturn performance for this incentive the TSO will evaluate how third-party actions, or events outside of its control, may have resulted in, or created, a measurable and justifiable deviation from planned or forecast performance. Where third party actions have facilitated accelerated delivery, this too will be noted in the outturn reporting. This *ex-post* adjustment process may lead to the exclusion of specific targets, the inclusion of similar substituted milestones or form the basis of performance adjustments arising from such actions or events.

This process will be documented and form part of the annual outturn reporting process. The achievement of the strategic aims of this incentive plan is the ultimate goal, therefore additional milestones may be included where these advance the achievement of the overall objectives of the plan.

5 Conclusion

The PR5 Local / Dublin Security of Supply MYP is a detailed plan against which the TSO's performance will be measured on an annual basis. This incentive plan contains metrics across the Infrastructure, Markets and Operations and Demand aspects of LSoS, is aligned with the TSO's ambitious Dublin programme, and the objectives contained within the TDP 2024-2033, to develop the transmission network so that it will continue to operate reliably in the future and ensure that the city and greater Dublin region is ready to facilitate renewable energy.

Appendix 1 - Consultation Responses

The following sections provide an overview of the Call for Input consultation responses received and EirGrid's responses thereto insofar as consultation responses received are of direct relevance to the specific content of the LSoS incentive multi-year plan.

Bord Gais Energy

Comments Received:

BGE believes that the actions being pursued need to demonstrate clear optimality with regards to both cost and time, and any underground cabling proposed solution should be based on a clear Cost Benefit Analysis to avoid unnecessary increases in the cost burden on consumers. BGE believes this application of a CBA in the choice of an optimum solution by the TSO addresses the requirement from the PR5 Decision that the "...TSO should consider a combination of infrastructure, market based, and operational solutions." The PR5 Decision also requires the TSO to "clearly identify the underlying technical scarcities responsible for the constraints such that technology-neutral service definitions can be developed". It is not evident in the plan that this has been included and BGE asks the TSO to update the plan accordingly.

TSO Response:

In the Multi-Year Plan for 2025-2029 the TSO demonstrates a combination of infrastructure, market based, and operational solutions to tackle the supply issue to Dublin. Quantitative assessment lies at the heart of EirGrid's six step process for developing the grid, in particular, in the optioneering steps, Step 2 and Step 3. In these steps a long list of appropriate options is developed from analysis of the system need in Step 1 and the toolbox of solution technologies and options available to meet the need.

Throughout Steps 2 and 3, a suite of five criteria is analysed leading to a multi-criteria assessment which determines the best performing solution option. The criteria assessed are technical performance, economic performance, environmental impact, socio-economic impact, and deliverability. These criteria are applied in increasing detail as the list of solution options is reduced. The economic performance criterion includes cost benefit analysis culminating in least worst regrets analysis.

At the start of every step in the six step process the need for network development is re-assessed to ensure the need remains robust and the options to meet the need remain appropriate.

Bord na Mona

Comments Received:

BNM notes that the TSO incentive plan regarding security of supply aligns with the CRU's strategic aim to address the issue of energy constraints in the surrounding Dublin area and will contribute to their removal. BNM also believes however, that in order to reflect national policy visions, the Multi Year Plan should also consider incentives to redirect future demand away from Dublin to areas where the grid is less constrained. The CRU's National Energy Demand Strategy specifically calls for the relocation of demand centres, as well as the co-location of renewable energy generation.

TSO Response:

EirGrid notes Bord na Mona's ideas around the location of new demand outside of the constrained Dublin area, and the idea of co-location, and is generally supportive of this process. We also note the need for new gas generation plant to support growing demand across the system and to provide flexibility that serves as a counterweight to the increasing variable generation on the system.

Appendix 2 - 2025 Project Milestones & Activities

No	CP No.	Project Name	2025 Milestones	2026 Milestones
1	CP0966	Kildare Meath Upgrade	Post Project Agreement Handover: TAO Construction 2025 - 2028*	Post Project Agreement Handover: TAO Construction 2025 - 2028*
2	CP1021	East Meath North Dublin	GW6: Approval to Enter Project Agreement in Q2 of 2025	Post Project Agreement Handover: TAO Construction 2025 - 2029*
3	CP1100	Finglas - North Wall 220kV Cable Replacement	Post Project Agreement Handover: TAO Construction 2025 - 2029*	Post Project Agreement Handover: TAO Construction 2025 - 2029*
4	CP1146	Carrickmines - Poolbeg 220kV Cable Replacement**	Step 5 - Marine Usage Licence and Marine Area Consent from MARA required by March 2025 to enable marine surveys and development of planning application for offshore cable section.	GW5: Submit planning application in 2026 (following marine site investigation programme)
5	CP1150	Inchicore - Poolbeg #2 220kV Cable Replacement	GW6: Approval to Enter Project Agreement in Q4 of 2025	Post Project Agreement Handover: TAO Construction 2026 - 2029*
6	CP1157	Inchicore - Poolbeg #1 220kV Cable Replacement	GW6: Approval to Enter Project Agreement in Q4 of 2025	Post Project Agreement Handover: Construction 2026 - 2029*
7	CP1190	Poolbeg 220kV Station	Post Project Agreement Handover: TAO Construction 2025 - 2027*	Post Project Agreement Handover: TAO Construction 2025 - 2027*
8	CP1213	Belcamp 220kV Busbar Extension	Post Project Agreement Handover: TAO Construction 2025 - 2029*	Post Project Agreement Handover: TAO Construction 2025 - 2029*
9	CP1214	Fingal to East Meath Grid Replacement	Step 4 Best Performing Options activities including public consultation will be conducted throughout 2025.	Conclusion of Step 4 BPO via Step 4a and Step 4b process.
10	CP1216	Poolbeg - North Wall 220kV Cable Replacement**	Step 5 Marine Area Consent from MARA required by March 2025 to enable, GW5: Submit planning application for River Liffey cable crossing by Q4 of 2025.	GW6: Approval to Enter Project Agreement as per Q4-24 NDP.
11	CP1226	Kildare Dublin Grid Replacement	Step 3 Best Performing Technology Options activities including public consultation leading to GW3: Capital Approval in Q3 of 2025	Step 4 Best Performing Options activities including public consultation
12	CP1251	North Wall Station Refurbishment	GW6: Approval to Enter Project Agreement	Post Project Agreement Handover: TAO Construction timeline under review*
13	CP1273	Dublin Central Bulk Supply Point (BSP)	Progress combined Step 4 and 5 leading to GW5: submission in Q3 of 2025	GW6: Approval to Enter Project Agreement in Q4 of 2026

All dates are from the published Q2-24 NPD - [Network Delivery Portfolio \(NDP\) | Grid Information | EirGrid](#), with the exception of CP1216. These milestones are subject to change as the projects develop.

* Once Project Agreement has been achieved in Step 6 the project is handed over to the TAO (ESB Networks). Milestone reporting is an activity for the TAO during design and construction until Energisation is completed.

Appendix 3 - The 6 Step Process

Designing an electricity transmission project can be a complex and lengthy process. To cater for this, EirGrid developed a consistent project planning and development process in 2017 to explore options and make decisions. It is an agile and flexible framework which includes transmission infrastructure projects and programmes of different types and scales. The duration or length a project remains in each step is dependent on the scale and complexity of each project.

The TSO's six-step project development and delivery process, known as the Framework for Grid Development⁷ includes six steps across the project lifecycle. Steps 1-3 are considered the investment planning steps and steps 4-6, the delivery steps. Projects enter the framework once they are sufficiently developed whilst also taking account of the applicable project need and the project driver. The framework is flexible and enables EirGrid and ESB Networks teams to appropriately combine steps and activities to deliver transmission infrastructure in a timely manner, in accordance with best practice, environmental, social, regulatory, and technical requirements.

Each step has an associated "gateway" approval point where governance decisions are made. The TSO's gateway 3 is the capital approval point, made within step 3, where a project transitions from being a pipeline project to an ongoing /stage 1 project. The gateway 6 approval is the point at which the TSO and TAO sign a Project Agreement and the project transitions from a stage 1 to a stage 2 project. At the end of step 6 the project is energised on the transmission system.



The 6 Step process with associated Gateways

⁷ [EirGrid-Have-Your-Say_May-2017.pdf \(eirgridgroup.com\)](#)

Acronyms

AIP - Auction Information Packs

BSP - Bulk Supply Point

CPP - Committed Project Parameter Document

CRU - Commission for Regulation of Utilities

CRM - Capacity Remuneration Mechanism

DTUoS - Demand TUoS

EoHT - Electrification of Heat and Transport

IPD - Investment Planning and Delivery

GW - Gateway

LCC - Locational Capacity Constraint

MYP - Multi-year plan

NCC - National Control Centre

NDP - Network Delivery Portfolio

PR4/PR5/PR6 - Price Review 4/5/6

TAO - Transmission Asset Owner

TOP - Transmission Outage Programme

TSO - Transmission System Operator