



An Coimisiún
um Rialáil Fóntais
**Commission for
Regulation of Utilities**

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Commission for Regulation of Utilities

National Energy Demand Strategy Biannual Update Q3 2025

Reference: CRU202580

Date Published: 04/07/2025

www.cru.ie

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
ACER	EU Agency for the Cooperation of Energy Regulators
CAP23	Climate Action Plan 2023
CAP24	Climate Action Plan 2024
CRU	Commission for Regulation of Utilities
DCEE	Department of Climate, Energy and the Environment (previously DECC, the Department of Environment, Climate and Communications)
DER	Distributed Energy Resource
DETE	Department of Enterprise, Trade and Employment
DRNC	Demand Response Network Code
DSO	Distribution System Operator
DSUs	Demand Side Units
EC	European Commission
EU	European Union
EV	Electric Vehicle
ENTSO-E	European Network of Transmission System Operators for Electricity
EPA	Environmental Protection Agency
ESBN	Electricity Supply Board (ESB) Networks
ESPF	Electricity Storage Policy Framework
FNA	Flexibility Needs Assessment
GNI	Gas Networks Ireland
IDA	Industrial Development Agency
kW	Kilowatt
LDES	Long Duration Energy Storage
LEU	Large Energy User

MIC	Maximum Import Capacity
MO	Market Operator
MW	Megawatt
NEDS	National Energy Demand Strategy
PV	Photovoltaic
RAs	Regulatory Authorities
SCALE	Smart Charging Alignment for Europe
SEAI	Sustainable Energy Authority of Ireland
SECs	Sectoral Emission Ceilings
SO(s)	System Operator(s)
SONI	Northern Ireland's Electricity Transmission System Operator
SNSP	System Non-Synchronous Penetration
ToU	Time of Use
TSO	Transmission System Operator
V2G	Vehicle to Grid
ZEVI	Zero Emissions Vehicles Ireland

Executive Summary

Ireland's National Energy Demand Strategy (NEDS) was published by the CRU on the 15th July 2024 (CRU202467). This strategy was developed to meet both the specific ambition set out in the Government's Climate Action Plan 2023 (CAP23) under an assigned CRU action (EL/23/24) to "*complete and publish an electricity demand side strategy and implementation plan*", and to support wider decarbonisation and security of supply objectives. The NEDS identified 53¹ actions assigned to a range of stakeholders for completion, with the overarching aim to enhance Ireland's energy demand flexibility through a coordinated phased approach. In addition, three recommendations for Government Departments were also defined in order to (1) consider policy measures regarding carbon emissions & Sectoral Emissions Ceilings (SECs); (2) support the delivery of an enhanced emissions reporting framework; and (3) consider a national strategic approach for the facilitation of new Large Energy User (LEU) connections.

As noted in the NEDS decision paper (CRU202467), the list of recommendations and actions which comprise the implementation plan have been developed at the time of publication to provide clarity for supporting organisations. This was to allow stakeholders to work towards delivering the NEDS objectives, with particular emphasis on the high impact and/or short term actions. Further work has since been carried out by those organisations to further define and develop supporting plans. Additionally, in certain instances, this has involved aligning with higher level organisation and resourcing plans. For instance, the CRU have prepared and submitted a Workforce Plan to Government Departments which sets out specific requirements for staffing to transform the CRU in supporting the policy agenda that emphasises transition to a low carbon economy and energy security. These resources are also required to progress a number of the actions identified in the NEDS implementation plan. Consequently, in some cases, actions are shown as "delayed" or "at risk of delay". Changes to the target completion dates will be considered in the next substantial update of the NEDS, which is anticipated in 2026/2027, or in future biannual updates. These changes will reflect the latest view of the scope and effort required, in addition to the availability of resources, to progress those actions. In the interim, the NEDS implementation group will oversee progress and any updates to the recommendations and actions as appropriate.

Following publication of the strategy, the NEDS entered its implementation phase. As part of the NEDS decision, the CRU committed to publishing a series of biannual updates intended to provide

¹ Note that a total of 51 actions were included in the NEDS Decision Paper (CRU202467, [link](#)). However, two of these actions (Actions No. 1.11 *Microgeneration operational issues*, and No. 3.2 *Enhanced quality and accessibility of network information*) are replicated for two different responsible bodies (EirGrid and ESNB). The tracking of these actions will be reported separately; hence the total here appears as 53 actions.

an ongoing summary of progress and status updates on NEDS actions, recommendations, and relevant policy developments. Accordingly, the first Biannual Update Q1 2025, relating to the preceding six month period was published by the CRU on the 5th February 2025 (CRU202505). This publication is the second such update to be provided in this series.

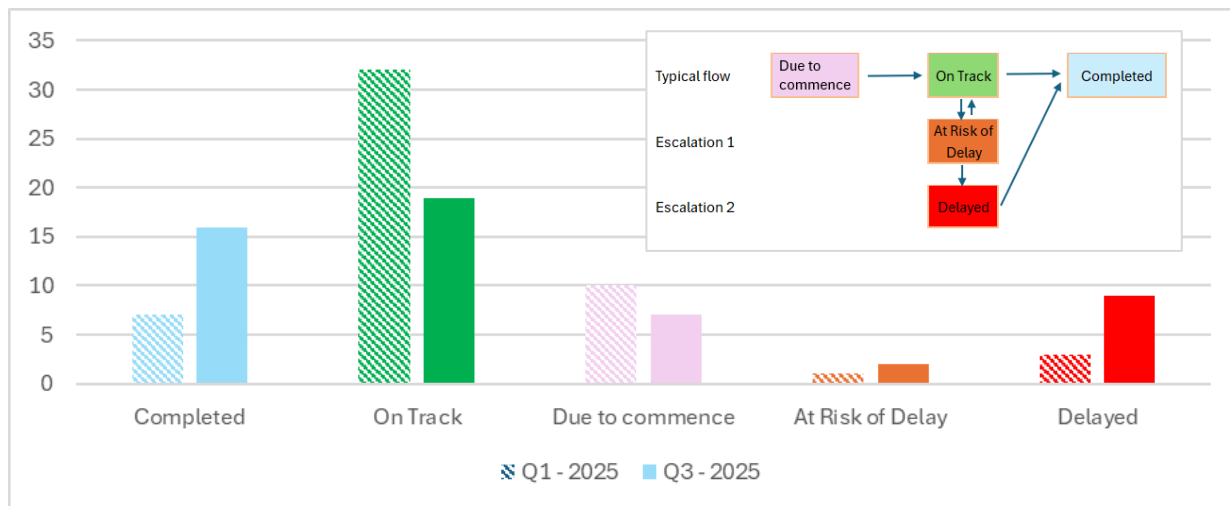


Figure 1: An overview of the status of NEDS actions. Q1 2025 updates are illustrated in the first columns (hatching), with latest updates for Q3 2025 shown in the second columns (solid).

As illustrated in Figure 1, the majority of actions, 35 out of 53, are on track, or have been completed. Since the first Biannual Update in February, an additional nine actions have been completed. However, nine actions are currently delayed, six of which are expected to be completed by Q3 2025, and two are at risk of delay.

1. Progress and associated updates

1.1 Introduction

The successful implementation and further development of the NEDS is dependent upon the CRU, together with all stakeholders, putting into effect the cross-Government policy, regulatory and other cross-agency measures. These measures, which are also required to support the wider objective of achieving the Government decarbonisation targets, were set out in the Implementation part of the NEDS decision paper.

1.2 NEDS Implementation & Progress

The NEDS Implementation Group was established in October 2024, with the primary objective of facilitating continuous and aligned engagement across Group organisation members² and monitoring the progress of NEDS actions and recommendations. The Group has been convened on three occasions following the publication of the NEDS, and generally on a quarterly basis. Since the Group’s inception, the Implementation Group have defined and agreed Governance Terms of Reference (completing NEDS Action 0.1) to provide the necessary operational arrangements to support the work of the Group. To further support the objectives of the Group and the broader NEDS objectives, the CRU also developed a NEDS Communications Strategy (NEDS Action 0.4) to facilitate the coordination and alignment of NEDS between the various stakeholders.

Table 1: Current membership of the NEDS Implementation Group

CRU (Chair)	DCEE	DETE
EirGrid	ESBN	GNI
IDA	SEAI	ZEVI

As set out in the NEDS decision paper, in order to assess if the strategy is working effectively and on course to deliver the objectives, it is necessary to measure performance against targets. It was decided that progress will be tracked in two ways. First, by tracking the progress of appropriate programmes of work, i.e. the status of NEDS actions and recommendations as illustrated in Figure 1, which will contribute towards the strategy objectives. This has been the focus of the previous

² Following a proposal and subsequent agreement by existing members of the NEDS Implementation Group, Zero Emissions Vehicles Ireland (ZEVI) joined as a new member in May 2025.

and current NEDS Biannual Update publications whereby the status of NEDS actions has been provided.

Secondly, it is intended to review the impact of the work programmes by developing a methodology for measuring and estimating flexibility, and their impact on carbon emissions. Particularly within the context of the relevant Climate Action Plan (CAP) targets set for 15-20% demand side flexibility by 2025 and 20-30% by 2030. Assessing flexibility across work programmes, in addition to the potential impact on carbon emissions, is a significant undertaking. Work activities have continued to progress and support these efforts, particularly through engagement with other bodies to understand how best to assess the impact and what relevant data is available. The CRU, together with the support of relevant stakeholders, will progress this work and endeavour to provide further updates in future publications of the NEDS Biannual Update.

1.3 CRU Large Energy Users Connection Policy Proposed Decision

In February 2025, the CRU published a Proposed Decision on the Larger Energy Users (LEU) connection policy which aimed to set out a pathway for data centre connection applications to the electricity grid which addresses risks in relation to security of electricity supply and network constraints while minimising, where possible, potential impacts on national renewable energy targets and carbon emissions. The consultation closed on the 4th April 2025, and the CRU is currently reviewing the feedback and preparing a decision paper for publication later this year.

1.4 ESNB Demand Flexibility Product Decision

In July 2024, the CRU approved the Distribution System Operator's (DSO) proposal to procure up to 500 MW of medium-term flexibility products with the main objective of addressing congestion management on the distribution network. Following on from this decision, the CRU published the second consultation on the ESNB Demand Flexibility Product Proposal, which sought stakeholder views on several topics to enable the procurement of medium-term flexibility products to address distribution network congestion. The consultation closed on the 9th December 2024. ESNB reviewed the consultation responses and developed a recommendations paper for submission to the CRU. Following review of the Recommendations Paper, the CRU published its Decision on the 20th May 2025, approving progression to the next stage of the procurement. ESNB will now proceed to the Call for Tenders stage, which is expected to launch in Q3 2025.

1.5 EirGrid Long Duration Energy Storage (LDES) Development

In 2023, EirGrid, in collaboration with Northern Ireland's Electricity Transmission System Operator (TSO) SONI, conducted a Call for Evidence on market procurement options for Long Duration Energy Storage (LDES). The Call for Evidence aimed to assess the need for LDES, potential investment barriers in the current market and explore possible services and revenue streams. The feedback gathered was consolidated and published in March 2024 to guide future policy development.

In 2024, the Department of Climate, Energy and the Environment (DCEE) published the Electricity Storage Policy Framework (ESPF) for Ireland. This framework set the policy for the development of energy storage solutions and provided a clear definition of long-duration storage as solutions capable of generating for more than four hours. Action 6 of the framework targets the initial procurement of 500 MW through a LDES route to market, with contracts expected by 2028. Additionally, Action 10 called for ensuring that a route to market for the identified optimum (long duration) electricity storage requirements for 2030-2040 is in place before the end of 2028.

EirGrid is responsible for implementing Actions 6 and 10 of the ESPF. As part of Action 6, EirGrid are developing a consultation on the mechanism to procure LDES. The consultation is anticipated to be published in September 2025. It will seek stakeholder opinions on the proposed procurement mechanism to attract investment in approximately 500 MW of ≥ 4 -hour duration LDES technologies in Ireland, in line with DCEE's ESPF. The CRU will continue to oversee the delivery of the LDES procurement mechanism.

1.6 Supplementary information for closed actions

This section contains further information in relation to selected actions which have been completed during the reporting period for this NEDS Biannual Update, which is approximately the first half of 2025.

1.6.1 NEDS Action 1.10: EirGrid's review of TSO Communication System for System Alerts

NEDS Action 1.10, which was due for completion in December 2024, stated: "Review the communication system that notifies relevant system users, such as suppliers and LEUs, in advance of a system alert and a low system non-synchronous penetration event. If required, implement additional communication process to new initiatives". In fulfilling this action, EirGrid drafted a report summarising this review, which was submitted to the CRU. In this report, EirGrid

reviewed the communications approaches, processes, and systems used to notify relevant system users of data and information about relevant system conditions, including new initiatives developed as part of the Security of Supply workstream. The report considers the relationships between different initiatives and the relationship with system alert status conditions. The initiatives considered include System Margin Outlook, System Margin Message, and System Margin Warning, Voluntary Demand Reduction, Mandatory Demand Reduction, Public Appeal, Temporary Emergency Generation, Flexible Demand contracts for LEUs, pilots including Beat the Peak and Conservation Voltage Reduction, and Rota Demand Disconnection. They were considered in relation to their use at different system alert levels, primarily as required by the action considering the pre-alert communications required, but then also the processes followed through in system alert and system emergency conditions.

The relevant communication details including the sources, target stakeholders, notice times, and channels in relation to these initiatives and the general communication of system alert status conditions were outlined. The locations of documentation and data sources for these processes and communications, and the data and information in relation to System Non-Synchronous Penetration (SNSP) conditions, were also outlined.

Closing the report EirGrid concluded that the communications system and processes for making data and information available to relevant system users on system conditions, including system alerts, low margins, and low SNSP periods, are already operating and working suitably well.

1.6.2 NEDS Action 1.11 (A&B): SOs review of microgeneration operational issues

Actions 1.11 A & B is for ESBN and Eirgrid to review the impact of operational challenges for System Operators (SOs) associated with high levels of microgeneration given the potential growth of installed capacity within this category over the short to medium term. ESBN and Eirgrid have reviewed reported impacts from other jurisdictions, consulted with internal stakeholders to assess the local impact, and presented actions for mitigating the risks associated with high levels of micro-generation connecting to the distribution system.

The report provides an assessment of the impact of high penetration of micro-generation, focusing on system security, operational constraints, and the evolving challenges for both system operators, given the limited visibility and controllability of these resources. It also outlines mitigation strategies and regulatory pathways to ensure secure and efficient integration of large volumes of micro-generation.

1.6.3 NEDS Action 2.7: ESBN's review of Maximum Import Capacity flexibility

Under Action 2.7, ESBN was required to explore opportunities for delivering flexibility through a dynamic Maximum Import Capacity (MIC) trading platform. To deliver on this action, ESBN have (i) undertaken an international market review of how such solutions are being piloted in other jurisdictions; (ii) considered internally the challenges and opportunities to introducing a dynamic trading platform in Ireland; and (iii) detailed the initiatives ESBN are currently progressing that will deliver flexibility through MIC.

Moving forward, ESBN will engage with the CRU and EirGrid to discuss the findings and recommendations from this review.

1.6.4 NEDS Action 2.10: ESBN review of DSO demand flexibility product

Under Action 2.10, ESBN was required to review potential options for DSO demand flexibility products. To address this action, ESBN developed a flexibility product framework of standardised products. Using this framework, ESBN reviewed actions taken to pilot and scale flexibility products in previous years, before reviewing the actions planned to develop new products and advance existing products in 2025, aligned to ESBNs' 2025-2029 Flexibility Multi-Year Plan.

In addition, ESBN undertook an initial concept review of an industrial heat flexibility product and engaged with supporting bodies on next steps to consider such a product.

1.7 ACER Demand Flexibility Related Updates

1.7.1 ACER Network Code on Demand Response

In June 2022, the EU Agency for the Cooperation of Energy Regulators (ACER) was mandated by the European Commission to draft a framework guideline on demand response, which would provide guidance for SOs to draft the EU network code. During the summer of 2022, ACER engaged stakeholders through a public consultation and a workshop, culminating in the submission of the framework guideline to the European Commission in December 2022. The Commission cleared the guideline in March 2023, and tasked the DSO Entity and ENTSO-E with drafting a proposal for the new EU rules.

On the 8th May 2024, ACER received the proposal for an EU-wide network code on demand response (DRNC). ACER then initiated a consultation process and engaged with stakeholders. The CRU, along with other National Regulatory Authorities (NRAs), contributed input throughout this engagement. The updated proposal was submitted by ACER to the European Commission on the 7th March 2025 for comitology (the process by which the European Commission implements EU law with the assistance of committees composed of national representatives). The

CRU is currently planning the implementation of the Code, pending the outcomes of the comitology process, and will continue to monitor progress.

1.7.2 ACER work on National Flexibility Needs Assessments (FNA)

Under the flexibility provisions of the revised Electricity Market Design Regulation and Directive, the ENTSO-E and EU DSO entity drafted a proposal on the national flexibility needs assessment methodology, which aims to establish a harmonized framework for assessing the need for flexibility services across Member States. Following engagement with the CRU and other NRAs, the draft was submitted to ACER. ACER now has three months, until the 16th July 2025, to approve or amend the SOs' proposal. Once approved, the methodology becomes binding for national assessments.

The CRU is currently coordinating the implementation of the FNA with EirGrid and ESBN, pending on the outcomes of ACER's decision, and will continue to monitor progress.

1.7.3 ACER Report Unlocking flexibility: No-regret measures to remove barriers to demand response

In April 2025, ACER released a report that identified ongoing obstacles to demand response and proposed a roadmap featuring 12 actions. This roadmap urges policymakers, SOs, regulators, and market participants to take initiatives that unlock the flexibility potential needed for a clear, secure, and competitive energy system in Europe. The recommended actions target barriers in various areas concerning demand-side flexibility and are particularly relevant to NEDS Actions, including the roles and responsibilities of market actors, simplifying access to markets, optimising tariffs and technology deployment to encourage consumer participation, and promoting non-wire solutions for the grid.

1.7.4 ACER Consultation on the impact of peak-shaving products on the EU electricity market under normal market conditions

In March 2025, ACER published a consultation to gather views on the potential impact of peak-shaving products designed to be used by SOs to stabilise the grid and lower prices during the crisis periods of excessively high wholesale prices. This consultation was held to strengthen the work by an Expert Group assessing how the development of peak-shaving products might affect the EU electricity market under normal market conditions. Assessment of findings from the consultation will inform the European Commission, which may propose amendments to the Electricity Regulation (EU) 2019/943 to introduce peak-shaving products beyond electricity price crisis situations. The outcome of the assessment is expected in Summer 2025.

1.8 SEAI Demand Flexibility Behaviour Policy

In order to promote demand flexibility and increase the uptake for smart energy services, the Behavioural Economics Unit of the SEAI have undertaken research to develop key recommendations³.

Strategies to induce demand flexibility among energy users tend to be drawn from classical economic models of human behaviour and have largely focused on creating smart energy services structured around financial incentives to shift electricity consumption away from times of peak demand (e.g. through time-of-use tariffs or demand flexibility reward programmes). While financial incentives can play a useful role, they are at times neither necessary nor sufficient to induce behaviour change. There is a wide range of other factors that needs to be considered if policies and interventions are to succeed.

Over the last two years, SEAI's Behavioural Economics Unit has undertaken a programme of research looking at behavioural factors underpinning demand-side flexibility, including;

1. An online experiment run in 2024 looking at factors influencing engagement and intentions related to demand flexibility and smart energy services with a sample of 1,500 participants⁴.
2. A comprehensive literature review, which was used to generate a detailed “taxonomy” of behaviours relevant to demand flexibility and behaviour change roadmaps for different types of behaviour⁵.
3. A time-of-use analysis of 2023 data from our Behavioural Energy and Travel Tracker (BETT) survey looking at the timing of electricity-consuming activities in Irish homes and factors affecting this⁶.
4. A survey/field experiment embedded in BETT in 2024, which pre-tested a simple intervention telling people about the environmental benefits of reducing peak consumption

³ SEAI (2025). Promoting demand flexibility and the uptake of smart energy services.

⁴ SEAI (2025). User engagement with demand flexibility and smart energy services: Results from an online experiment.

⁵ SEAI (2025). Behavioural insights for electricity demand flexibility: Barriers and enablers to behaviour change and engagement with smart energy services.

⁶ Lavin, C & Julienne, H (2025). Household activities underlying residential electricity demand: who does what during the evening peak? *Energy Efficiency*, 18(43). <https://doi.org/10.1007/s12053-025-10322-4>

with an option to pre-commit to specific actions, looking at how this affected their activity during the evening peak in the next survey wave compared with a control group.

The recommendations, seen as important for promoting demand flexibility and the uptake of smart energy services, based on research findings and specifically from behavioural science perspective, can be found in the associated SEAI paper³. They are provided in relation to: (1) communication campaigns; (2) consumer tools and supports; (3) time-of-use tariffs; and (4) distributional and equity issues.

2. Upcoming milestones

- Next CRU NEDS Biannual Update Q1 2026
- Large Energy Users Connection Policy Decision 2025

3. Relevant publications

- CRU National Energy Demand Strategy Biannual Update Q1 2025 (CRU202505)
- CRU National Energy Demand Strategy Decision Paper (CRU202467)
- CRU Large Energy Users Connection Policy – Proposed Decision Paper (CRU202504)
- ESNB DMSO Blueprint and Roadmaps Information Paper 2025 (DOC-280425-IFC)
- DSO Demand Flexibility Product Arrangements – CRU Decision Paper (CRU202560)
- ESNB Demand Flexibility Product Proposal – 2nd Consultation Oct 2024 (DOC-191223-HVV)
- DSO Demand Flexibility Product Procurement – CRU Decision Paper (CRU202469)
- ESNB Demand Flexibility Product Proposal – 1st Consultation Dec 2023 (DOC-191223-HVV)
- EirGrid & SONI Response to the Call for Evidence on Long Duration Energy Storage (LDES), March 2024
- SONI and EIRGRID TSO Demand Side White Paper ([link](#))
- ACER draft Demand Response Network Code (DRNC) submission to the European Commission Q1 2025
- ACER Draft Network Code on Demand Response
- DIRECTIVE (EU) 2019/944 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU

4.NEDS Actions Update

Action No.	Action Title and Description	Responsible body (Supporting body)	Completion Date	Progress	Update
Overall Strategy					
0.1	Governance arrangements for NEDS implementation Develop and agree governance Terms of Reference, and maintain dialogue on enduring governance for NEDS. Hold associated meetings and engagements.	CRU (DCEE)	Q4 2024	Completed (Q1 2025) ⁷	Governance Terms of Reference developed with key stakeholders. Relevant engagements ongoing.
0.2	Review the impact of NEDS on carbon emissions Establish a methodology and the potential emissions impact of NEDS.	CRU (EPA, SEAI, DCEE)	2025	On Track	Ongoing internal and external engagement is taking place with a view to scoping the most appropriate approach to methodology design.
0.3	NEDS progress reporting Publish progress reports. Reports will assess progress in three ways: by estimating flexibility delivered to the system from NEDS initiatives, tracking progress of actions, and reviewing the impact of NEDS initiatives on carbon emissions.	CRU (SOs, EPA, SEAI, DCEE)	2026	On Track	The second in the series of NEDS Biannual Updates (continuing to track the progress of all NEDS actions and recommendations) is being published in Q3 2025.

⁷ Where actions are indicated as having been “completed”, the corresponding NEDS Biannual Update is provided (where the completion status has been achieved). Note that there may be some difference between the specific date on when the action was actually completed, in comparison to the quarter for which the action is being reported as completed.

0.4	Develop NEDS Communications Strategy Develop a communications strategy for the overall NEDS.	CRU (DCEE, DETE, ESBN, EirGrid, GNI, SEAI, IDA)	Q4 2024	Completed (Q1 2025) ⁷	A NEDS Communications Strategy has been developed to facilitate the coordination and alignment of NEDS activities across the relevant stakeholders.
0.5	Publish NEDS strategy update Develop and iterate strategy to reflect progress of initiatives and new information. Decision document for following period of NEDS delivery published.	CRU (DCEE, DETE, State Agencies)	2026/2027	Due to commence	Work will be initiated in due course and at an appropriate time (likely 2026), which will allow for carrying out the 53 actions identified in the NEDS Decision Paper. Learning and feedback from the impact of these actions will be taken into consideration, which will allow for the development of the next iteration of the NEDS.
Area 1A: Smart Services – Retail, Products and Incentives					
1.1	ToU tariffs Increase the number of permitted ToU tariffs offered and address barriers and incentives to increase uptake across customers.	Energy suppliers (CRU)	2026	On Track	Since 1st April 2025, suppliers have been free to offer customers up to 8 time of use tariffs (previously was only up to 6).
1.2	Dynamic tariffs Develop and offer dynamic tariffs to customers following decision requiring suppliers with more than 200,000 final customers to have dynamic tariffs in place.	Energy suppliers (CRU)	Q3 2025	Delayed	In response to a request received by the CRU from suppliers, the CRU has extended the deadline by which suppliers must bring dynamic tariffs to the market from 01/10/25 to 01/06/26.
1.3	Smart EV charging services Engage across relevant parties to develop propositions for smart charging services, including an exploratory investigation of vehicle-to-grid (V2G) services. Establish working group to explore barriers and enablers. Publish programme of work.	ESBN (CRU, Energy suppliers, ZEVI, EirGrid)	Q4 2025	On Track	In terms of engaging across relevant parties to develop propositions for smart charging services, this is being achieved through the work detailed within NEDS Actions 2.13, 2.16 and 2.17 respectively. Upon conclusion of those work activities, expected in early Q3 2025, ESBN anticipates establishing a working group to explore barriers and enablers in the context of the outputs from the relevant NEDS Actions. Lastly, ESBN will work towards the publication of a programme of work in Q4 2025.

1.4	<p>Review of policy & supports for EV charging Review measures that support EV charging with a view to identifying how they can better support flexibility. This should include a review of depot charging for Heavy Duty Vehicles to consider how this type of charging can support flexibility potential.</p>	ZEVI (SEAI, CRU)	Q1 2025	Completed (Q3 2025) ⁷	Internal review is now completed which will inform the next iteration of the National EV Infrastructure Strategy.
1.5	<p>Price Comparison Website accreditation Consult on the Price Comparison Website Accreditation Framework.</p>	CRU	Q4 2024	Completed (Q3 2025) ⁷	CRU Published consultation on a review of the PCW Accreditation Framework in May 2025 [CRU/202566]
1.6	<p>Customer engagement for flexibility initiatives Develop, agree and publish plan for customer (residential & businesses) engagement to drive widespread awareness, consumer interest and desire to participate in flexibility initiatives.</p>	Smart Energy Services Working Group (Energy suppliers, DCEE, CRU, SEAI, ESBN, EirGrid)	Q1 2025	Delayed	To be incorporated into the new National Energy Affordability Taskforce once it is established.
1.7	<p>Flexibility benefits and opportunities for businesses Develop an approach for active engagement with businesses to raise awareness of information about the opportunities for companies to participate in and benefit from flexibility as appropriate to existing programmes (e.g. support schemes, financial/carbon savings).</p>	SEAI (CRU, DETE, IDA, Enterprise Ireland, Energy suppliers)	Q3 2025	Completed (Q3 2025) ⁷	The smart and flexible energy hub is live on the SEAI website (link) with a dedicated section for businesses, providing information, education and awareness for smart and flexible opportunities for businesses. The SEAI will continue to update and evolve this hub on an ongoing basis to adequately meet the needs of a rapidly changing sector.

1.8	<p>Tariffs for business Undertake market testing, research and trials to enable tariffs most suited to businesses’ demand profiles to be developed.</p>	Energy suppliers (CRU)	Q3 2025	On Track	Majority of energy suppliers offer at least 1 commercial tariff to businesses; with some suppliers offering multiple commercial tariff options.
Area 1B: Smart Services – Infrastructure and Systems					
1.9	<p>Completion of smart meter rollout Smart meter upgrades to continue across remaining domestic customers including day/night meters. Complete rollout of smart meters for 3 Phase customers. Develop and adapt delivery to maximise the benefits of smart meters.</p>	ESBN (CRU)	2026	On Track	<p>Progress continues for the smart meter rollout, with 62k exchanges completed so far this year. This brings the total exchanges to 1.957 million, steadily progressing toward the goal of completing the full rollout of more than 2 million meters.</p> <p>Three-phase whole current smart meters—used by larger households, farms, and small businesses—are scheduled to begin deployment in Q3 2025. ESBN have been proactive in communicating the benefits through public updates and social media, helping to build awareness and trust in the programme.</p>
1.10	<p>Communication system for system alerts Review communication system that notifies relevant system users (such as suppliers and LEUs) in advance of a system alert and a low system non-synchronous penetration (SNSP) event.</p>	EirGrid	Q4 2024	Completed (Q1 2025) ⁷	Report submitted to the CRU (Q1 2025). <i>See section 1.6.1 of this document for further information.</i>
1.11A	<p>Microgeneration operational issues Review impact of operational challenges for System Operators associated with high levels of microgeneration given the potential growth of installations and report to the CRU.</p>	ESBN (CRU)	Q2 2025	Completed (Q3 2025) ⁷	Joint ESBN and EirGrid report drafted and currently undergoing internal review in advance of submission to CRU. <i>See section 1.6.2 of this document for further information.</i>

1.11B	Microgeneration operational issues Review impact of operational challenges for System Operators associated with high levels of microgeneration given the potential growth of installations and report to the CRU.	EirGrid (CRU)	Q2 2025	Completed (Q3 2025) ⁷	A report has been compiled, detailing the challenges facing the TSO, along with potential mitigations and recommendations. ESBN and EirGrid's reports have been consolidated and submitted to the CRU in Q2 2025. <i>See section 1.6.2 of this document for further information.</i>
1.12	Market design changes for secondary measurement devices Consultation to establish what market design changes will be required for secondary measurement devices, and the timelines for implementing those changes.	CRU (ESBN, EirGrid)	2026	Due to commence	Working towards original completion date. Awaiting transposition of Directive 2024/1711 to progress action.
Area 1C: Smart Services – Business Models					
1.13	Licences for aggregation and demand response Consult on development of new licences for aggregation and demand response.	CRU	2025	Due to commence	Working towards original timelines.
1.14	Regulatory framework for “Relevant Market Participants” Consult on a regulatory framework for “Relevant Market Participants”, which is a market participant that is not a licensed electricity undertaking, to support emerging and innovative business models.	CRU	2025	At Risk of Delay	CRU currently undertaking a review of the legal framework underpinning Relevant Market Participants before commencing the consultation process. As a result of this review, the consultation process is likely to be delayed
1.15	Energy sharing and trading Publish call for evidence in relation to energy sharing to identify and develop opportunities to support producers and consumers to share their generated electricity and incentivise flexibility.	CRU (ESBN, EirGrid)	2025	On Track	CRU awaiting the transposition of Directive 2024/1711 to outline specific requirements of energy sharing in Ireland. CRU is working on a High-Level Design for energy sharing and intend to publish a call for evidence on this design in Q3 2025.

Area 1D: Smart Services – Standards and Interoperability					
1.16	‘Flexibility readiness’ requirements Introduce technical requirements for interoperable telecommunications and control facilities for inverter interfaced small scale solar PV and battery sources.	ESBN (Smart Energy Services Working Group, SEAI, CRU)	Q3 2025	At Risk of Delay	A vendor was selected in January 2025 and discussions remain ongoing to finalise the scope ahead of the launch to test a pilot in Q3 2025. It is anticipated that this will run for 3-4 months. At present, ESBN anticipates finalisation of findings may run into Q4.
1.17	Energy smart appliances Publish review of options for development of standards to enable the uptake of “energy smart” appliances.	Smart Energy Services Working Group (DCEE, NSAI, DETE, CRU, ESBN)	Q3 2025	Due to commence	To be incorporated into the new National Energy Affordability Taskforce.
1.18	Smart Meter Data Access Code Publish decision on the Smart Meter Data Access Code to determine how smart meter data can be accessed by market participants and third parties	CRU (ESBN, Energy suppliers)	Q3 2024	Completed (Q3 2025) ⁷	The CRU published its decision on the Smart Meter Data Access Code (CRU202517) on the 19th February 2025.
Area 2A: Demand Flexibility & Response – Market Frameworks					
2.1	Electricity network tariff reform Commence project to assess options for reform of electricity network tariffs and charging, addressing priority areas for delivery that have emerged through the NEDS process including treatment of storage, and fixed and volumetric allocations.	CRU	Q2 2025	Delayed	A delay has been incurred due to a lack of resources. Work is progressing to procure the necessary expertise and resources for this project. Which has included the preparation and submission of a Workforce Plan to Government Departments, setting out specific requirements for staffing to transform the CRU in supporting the policy agenda that emphasises transition to a low carbon economy and energy security. Tariff reform project to re-commence in Q3 2025.

2.2	<p>V2G charging point uptake Review how support for the increased uptake of V2G-enabled charging points can be implemented as part of the Electric Vehicle Charging Strategy 2026 – 2029 and reflect this updated strategy publication.</p>	ZEV (CRU, ESBN, Charging Point Operators)	Q4 2025	On Track	Work has commenced on the Electric Vehicle Charging Strategy 2026-2029 which will reflect rollout of V2G enabled charging.
2.3	<p>Increase flexibility provided by DSUs Develop and publish a plan of work to improve active participation and performance of DSUs in the market and remove barriers. Plan to clarify expectations on DSUs to increase the flexibility, consider industry-suggested code changes and describe technical updates to be implemented for TSO and MO systems.</p>	EirGrid (DSUs, Suppliers, ESBN, CRU)	Q1 2025	Completed (Q3 2025) ⁷	TSO Demand Side White Paper published on EirGrid and SONI websites. A TSO Demand Side Implementation Plan, which will include the elements in this action, has been drafted. The actions required to improve active participation and performance of DSUs in the market were identified, and consolidated in a high level report. This report was due to be published on EirGrid’s website in July 2025.
2.4	<p>Market changes to enable increased flexibility Assess and report on status and potential solutions to enable energy market participants to offer increased flexibility through the energy market, supporting more flexible trading of demand, engaging suppliers more actively, and ensuring technology neutrality in market and dispatch systems.</p>	EirGrid (CRU, ESBN, Market participants)	Q2 2025	Delayed	TSO Demand Side White Paper published on EirGrid and SONI websites. A draft of TSO Demand Side Implementation Plan, which will include the elements in this action, has been developed. The final version is expected by July 2025. The plan includes actions to improve flexibility analysis, impacts and participation on energy market, and engagement of suppliers

Area 2B: Demand Flexibility & Response – Procurement and product development					
2.5	Long Duration Energy Storage Develop detailed procurement options informed by Call for Evidence responses and report to the CRU. Consultation paper to follow (Q4 2024).	EirGrid (CRU, DCEE)	Q3 2024	Delayed	LDES Procurement Mechanism consultation has received CRU approval. Consultation publication is scheduled for September 2025.
2.6	TSO demand flexibility product EirGrid to keep under review further potential options for TSO demand flexibility products, reporting output to CRU.	EirGrid (CRU)	2025	Due to commence	TSO Demand Side Implementation Plan needed before this work can start.
2.7	Maximum Import Capacity flexibility ESBN to review opportunity to deliver flexibility through Maximum Import Capacity on distribution system connection agreements and engage with the CRU.	ESBN (CRU, EirGrid)	Q1 2025	Completed (Q3 2025) ⁷	Review of opportunities complete and submitted to CRU in June 2025. Overview provided to NEDS Implementation Group in June 2025. <i>See section 1.6.3 of this document for further information.</i>
2.8	Flexibility Needs Assessment Undertake and publish assessment of flexibility needs in line with ACER flexibility-needs assessment methodology, and other relevant considerations (e.g. the assessment of EV recharging points operation & potential contribution, Alternative Fuels Infrastructure Regulation - Articles 15 (3) and (4)). Engage with fellow regulators via ACER and CEER to maximise learning from others, and to influence direction of flexibility market design across the EU.	CRU (EirGrid, ESBN)	Q2 2026	On Track	CRU have engaged with the key stakeholders to develop an approach for the flexibility needs assessment.

2.9	<p>Flexibility market development In update to flexibility multi-year plan set out plan for longer term ambition to move from focused product development to broader technology and sector agnostic arrangements to build a deep and competitive market.</p>	ESBN	Q4 2025	On Track	Action being progressed internally within ESNB. Currently considering an update to the Phased Flexibility Market Development Plan. Further engagement with CRU required.
2.10	<p>DSO demand flexibility product Review further potential options for DSO demand flexibility products including industrial heat.</p>	ESBN (CRU, DEFE, Enterprise Ireland)	Q1 2025	Completed (Q3 2025) ⁷	Reviewed a range of existing and new products that enable flexibility participation across various market segments. Engaged with supporting bodies and review submitted to CRU in May 2025. Overview also provided to NEDS Implementation Group in June 2025. <i>See section 1.6.4 of this document for further information.</i>
2.11	<p>DSO flexibility procurement Second stage consultation on detailed aspects of product design to support medium-duration flexibility procurement tender process.</p>	ESBN (CRU)	Q3 2024	Completed (Q1 2025) ⁷	Second stage consultation on the Demand Flexibility Product closed on the 9 th December 2024.
2.12	<p>Biomethane lighthouse Publish plan to deliver biomethane lighthouse project, including indication of anticipated biomethane volumes and further details (e.g. imported or domestic, if via Guarantees of Origin, etc.) to deliver flexibility.</p>	ESBN (CRU, GNI, Biomethane Implementation Group)	Q4 2024	Completed (Q1 2025) ⁷	Expression of interest published in November 2024 (link). Engagement complete with supporting bodies on the project plan.

2.13	Smart charging flexibility product Develop and launch new smart charging flexibility product and/or service and ensure the delivery is fair and effective in enabling demand flexibility through EVs.	ESBN (CRU, Suppliers)	Q4 2025	On Track	Work progressed by ESBN on EV initiative building on findings from the FlexCharging pilot. Currently progressing to high level design with a domestic EV demand side flexibility product which would support localised network constraint.
2.14	Gas flexibility products & services Undertake assessment to identify flexibility products & services on the gas network which can contribute towards achieving targets and overall NEDS objectives (Ref: Energy Security Package Action 4).	GNI (CRU)	2025	On Track	GNI are engaging with DCEE / CRU following the publication of the LEU proposed decision paper and are working on an Interruptible Capacity proposal, in conjunction with both.
Area 2C: Demand Flexibility & Response – Technology, Platforms and Systems					
2.15	European SCALE project monitoring Monitor relevant developments from the Smart Charging Alignment for Europe (SCALE) project and reflect learnings in updated NEDS strategy.	CRU	2026	On Track	Ongoing monitoring in progress with relevant learnings/input to be fed into NEDS and other workstreams as appropriate.
2.16	Optimise EV fleet charging Develop and publish plan to optimise EV fleet charging through technology and software solutions.	ESBN (Aggregators of EVs, Suppliers, CRU, ZEVI)	Q2 2025	Delayed	The project mobilised with research partner. Research partner has concluded a barrier and enabler analysis to examine the technical, regulatory, and operational factors that impact the adoption of fleet optimisation solutions in ESBN’s licensed area. The final deliverable for this NEDS Action is anticipated to extend into early Q3 2025 when engagement with supporting bodies concludes, a slight delay on the originally planned date of Q2 2025.

2.17	<p>Smart EV charging availability Develop and publish technical assessment of how the available smart EV charging and V2G capacity can be maximised through network operations.</p>	<p>ESBN (CPOs, ZEVI, large EV fleet owners/operators and Local Authorities)</p>	Q2 2025	Delayed	<p>The project mobilised with research partner. Progress continues on the design of a comprehensive V2G pilot project plan. The final deliverable for this NEDS Action is now anticipated to extend into early Q3 2025 when engagement with supporting bodies concludes, a slight delay on the originally planned date of Q2 2025.</p>
2.18	<p>Changes required for dispatchable consumption Implement code and system changes to better accommodate "dispatchable consumption" proposals and upwards demand response.</p>	EirGrid	2027	On Track	<p>High level requirements finalised, and detailed requirements gathering activities underway. Early vendor engagement commenced on design approach. Impact assessment of changes to T&SC and EirGrid and SONI Grid Codes has commenced. Modification drafting was due to commence in Q2 2025. Significant industry engagement through Q4 2024 and Q1 2025 identifying potential barriers (e.g. network charges) to be further addressed. Engagement with the SEM RAs is ongoing relating to this initiative. Engagement commenced and ongoing with Meter Data Providers and Distribution System Operators. Detailed design scheduled to start in H2 2025.</p>
Area 2D: Demand Flexibility & Response – Information, Certification and Reporting					
2.19	<p>Electricity system emissions information Review approach to reporting of real time emissions from TSO dispatch of the system engaging with the CRU. Develop approach to integrate emissions data and reporting into wider TSO decision-making where it is possible to do so.</p>	<p>EirGrid (CRU, ESBN, SEAI)</p>	2025	Due to commence	<p>Work to start scoping is expected to begin soon.</p>

2.20	<p>Gas network emissions information Explore and implement potential enhancements to the information available on system emissions, drawing on international examples and engaging the CRU.</p>	GNI (CRU)	Q4 2024	Delayed	GNI and CRU have discussed the requirements for this action. Internal GNI workshops have been completed, a web-based solution has been designed and is now in development. Completion is expected in Q3 2025.
2.21	<p>Enhanced emissions reporting framework (Part 1) Deliver the design report for an enhanced emissions reporting framework for electricity emissions for LEUs (CAP24 action: EL/24/22).</p>	SEAI (CRU, EirGrid, ESBN, Enterprise Agencies)	Q3 2024	Completed (Q1 2025) ⁷	The SEAI's LEU electricity emissions reporting framework published in December 2024 (link).
2.22	<p>Electricity Guarantees of Origin Review data on Guarantees of Origin including information currently used by suppliers for fuel mix disclosure, and identify design options for more detailed certification implementation. (Linked to 2.21)</p>	CRU (SEMO)	Q4 2024	Completed (Q1 2025) ⁷	Reviewed the design options for more detailed reporting on GOs in the annual FMD Reporting with SEMO in Q4 2024, followed by discussions on data availability and final output of design options in Q2 2025. It was decided to retain the current structure of the FMD Annual Report at present and await EU guidelines on granular GOs.
2.23	<p>Certification of additionality for (a) power and (b) renewable gas Explore the potential offered by new structured power products in the market and review options for certification of additionality for (a) power (CRU, EirGrid) and (b) renewable gas (CRU, GNI). Review and consult subject to initial assessment. (Linked to 2.22)</p>	CRU (EirGrid, GNI)	Q2 2025	Delayed	Initial review and assessment as to whether potential options currently exist for certification of additionality has been completed. Internal status report to be drafted summarising outcome of review conducted, recommendations and next steps. Expected report completion in Q3 2025.

2.24	<p>Future role of the gas network Ensure a fit for purpose gas grid, that supports Ireland’s energy and climate ambition. Includes the development of scenarios to define the future role of the gas network. (Ref: Energy Security Package Action 16)67</p>	GNI (DCEE, CRU)	2024 - 2025	On Track	Detailed scoping is ongoing in GNI on mapping out the deliverables for Actions 2.24 and 2.25. GNI has been engaging with DCEE coordinating the long term planning requirements.
2.25	<p>Support planning for the future role of the gas network and pathway for implementation Develop a plan for transitioning the gas network over time, taking due consideration of various aspects including development of the hydrogen and biomethane sectors, energy security, costs, blending, amongst others. (Ref: National Hydrogen Strategy Action 12)</p>	GNI (DCEE, CRU)	2023 - 2026	On Track	Detailed scoping is ongoing in GNI on mapping out the deliverables for Actions 2.24 and 2.25. GNI has been engaging with DCEE coordinating the long term planning requirements.
Area 3: New Demand Connections					
3.1	<p>Publication of new LEU connection policy (a) Publish the next stage of consultation. (b) Publish and implement new connection policy for LEUs.</p>	CRU	a) Q3 2024 b) 2025	On Track	a) Proposed Decision published in February 2025 b) Responses to proposed decision being reviewed and considered in development of final decision paper.

3.2A	<p>Enhanced quality and accessibility of network information Enhance quality and accessibility of information relating to areas of the network, where capacity is available and future network development plans.</p>	ESBN (CRU)	2025	On Track	<p>Review of existing material and information continues. In Proposed Decision CRU202504 the CRU made a proposed decision to require the SOs to publish regular up to date locational information (existing and outlook) in relation to the availability of capacity on the electricity network and network constraint. The format of this will be determined through further engagement between the CRU and the SOs.</p>
3.2B	<p>Enhanced quality and accessibility of network information Enhance quality and accessibility of information relating to areas of the network, where capacity is available and future network development plans.</p>	EirGrid (CRU)	2025	Due to commence	<p>This is being considered as part of the CRU's LEU Connection Policy consultation work. In Proposed Decision CRU202504 the CRU made a proposed decision to require the SOs to publish regular up to date locational information (existing and outlook) in relation to the availability of capacity on the electricity network and network constraint. The format and timing of this will be determined through further engagement between the CRU and the SOs.</p>
3.3	<p>Monitor work being undertaken to assess the role that integrated energy parks could play in our future energy system Monitor work being undertaken as part of the National Hydrogen Strategy to assess the role that integrated energy parks could play in our future energy system, including their potential benefits and the possible barriers (market, legal or other) that may exist. (Ref: National Hydrogen Strategy Action 6)</p>	CRU (DCEE, DETE, IDA, ESBN, EirGrid, GNI)	Q4 2025	On Track	<p>CRU has engaged with DETE in the development of the Green Energy Parks report. The CRU is of the view that a strategic State-led approach to economic development and coordinated infrastructure delivery can address some of the challenges being faced in terms of grid capacity and security of supply in the medium to long term</p>

5. Next Steps

- The next NEDS Biannual Update publication is planned for Q1 2026.
- The NEDS Implementation Group will continue to meet on a quarterly basis to promote progression of the NEDS actions and discuss any relevant aspects, including any challenges arising which may pose a threat to delivery.

The CRU welcomes feedback (energydemandstrategy@cru.ie) in relation to the information set out in this NEDS Biannual Update publication, or any topics relevant to the overall strategy.