Commission for Regulation of Utilities (CRU)

Electricity Network Tariff Structure Review – Consultation Response

24/10/25

About Trifecta Ireland

Trifecta Ireland is an independent, non-profit initiative working to accelerate Ireland's transition to a clean, secure, and affordable energy future.

We provide bold, evidence-informed leadership to address systemic failures in the energy sector. Grounded in global systems change theory, Trifecta identifies what enables successful large-scale transformations and applies these principles to Ireland's unique energy context.

Our niche is connecting global insight with local action. We bring together stakeholders across government, industry, science, and civil society to co-design and drive integrated, system-wide solutions. By fostering collaboration and aligning incentives, we aim to unlock opportunities and remove barriers to Ireland's energy transformation.

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Stakeholder Engagement

1. How should the CRU engage with stakeholders over the course of the Electricity Network Tariff Review?

We would favour a co-creation approach whereby a stakeholder group is actively involved in helping shape the policy. At key points subgroups could be constituted to work on issues.

We favour that approach as it ensures that CRU can make use of some of the resource in the sector. Also, it should enable a more efficient consideration of feedback taking issues in parallel rather than addressing them sequentially (i.e. CRU staff develop proposals – test through consultation – CRU consider – issue an updated structure).

Periodic output and emerging frameworks can be shared for consultation and review by senior stakeholders to ensure the group stays on track.

For specific issues, where an issue impacts a particular cohort, the CRU could consider a targeted engagement with a sample of that cohort.

Where possible, the CRU should make use of productivity enhancing tools through this process. For example, AI tools to take minutes or process data or information. Of course, the outputs need review, but they can enhance effectiveness through performing the first pass or processing large volumes of information.

The approach above should enable iterations of issues, maximising the ability of the CRU to drive out issues in a time and resource efficient manner.

2. If a dedicated Electricity Network Tariff Review stakeholder group is established, would you be interested in participating? If such a group was over-subscribed, how should the CRU limit the number of members?

Trifecta Ireland would be extremely interested in participating in such a stakeholder group as network tariffs are a central plank of the regulatory framework and play a key role in the economics of all users of the electricity network and ultimately influence the price paid by all electricity customers.

Our view of system change involves a predominantly electrified energy system in Ireland. Given that macro context, we view electricity network tariffs as a central regulatory question and would be willing to devote senior-level resource to the subject area. We would commit our CEO Conall Bolger to contributing to the process.

In a scenario where such a group was over subscribed, we'd suggest that the CRU use two factors:

1. Representation – similarly to the Network Stakeholder Engagement Evaluation panel, the CRU attempts to reflect a variety of archetypes of network user in the panel.
2. Resource – consider the experience and expertise level of the proposed resources. Given the likely depth of conversation and regulatory design challenges, such a group should include personnel with expertise.

Objectives

3. Do you agree with the objectives of the Electricity Network Tariff Structure Review? Please state your reasoning.

Trifecta Ireland's key guiding principle is ensuring a clean, secure and affordable energy future for all. We see a high degree of alignment between that mission and the high-level objectives as set out in the 2021 paper.

The two key objectives provide a suitable framework for the review with the emphasis on consumers, the evolving network and a low carbon future. That said, there may value in a further refinement (discussed under the next question).

4. Should the CRU include any other objectives? If so, please explain your reasoning.

We welcome the emphasis on competitiveness and cost effectiveness within the "Low Carbon Future" objective. Considering the potential distributional effects of a network tariff regime for all users, there could be value in considering an equity dimension (for example how network tariffs impact on those in energy poverty). It may be captured under "in the best interests of consumers", but it may be valuable to make that explicit here and within the Principles.

Proposed Principles

5. Do you agree with the proposed principles of the Electricity Network Tariff Structure Review? Are they clearly defined?

We are supportive of the overall principles as laid out. We would urge the CRU to ensure that these principles are given sufficient weighting through the process of design

or we risk inadequate outcomes. Some examples worth considering under our current network charging regime:

Transparency and Simplicity – as evidenced by the absence of any service provider offering the service, it close to impossible to meaningfully forecast the current network tariffs. As such, their ability to act as a signal can be outweighed by the uncertainty associated with them.

Cost Recovery – a perspective exists that the current regime appears to privilege cost recovery for the network operators over many other considerations. While a relevant factor, the changing use of the electricity system as we electrify and decarbonise, with users operating on the network in new and varied ways means that the flows and volumes over which to recover the network costs could be quite different. We need to avoid the network tariffs acting as a disincentive to the broader objective. Therefore while we acknowledge cost recovery as an important element of a network charging regime, it should be done so in service of the twin objectives.

Stability – there may be lessons to be learned from the last few years in which we have seen instances of significant variances year-on-year within the network charging regime (e.g. a 20% DUOS increase for domestic customers between 2024/25 and 2023/24).

Adaptability – as noted in the 2021 consultation paper our current regime was put in place around the turn of the century and reflected the world then. The context for this network tariff review is a very different one involving mass decarbonisation, digitisation and a substantial increase in the volume of electricity being utilised across the energy sector. This review should consider building in a mechanism to review with a point in time identified for that process.

6. In your view, should any further principles be added, or any existing proposed principles be removed? Please explain your reasoning.

While it might be implicit in some of the other principles, having an explicit equity consideration might be valuable. Network tariffs involve allocation decisions and have distributional effects. While there may be equality of pricing across a customer type, they may not have equal access to the capacity to pay or manage their exposure. This statement is validated by the following studies: ESRI research that found 29% of homes are in energy poverty or the recent UCD-Pobal report that found disadvantaged communities are five times less likely to benefit from renewable energy.

7. Do you agree with the areas that are identified as in-scope and out-of-scope for the review? Please state your reasoning.

Given the proposed principle of Coherency and the need for a consistent philosophy through the network charging architecture, we'd suggest that the generation transmission charges can't be ignored indefinitely. Thus, while the CRU proposes to focus on the demand side in this process, we would welcome a proposed timeline for the SEM Committee to engage with G-TUoS and balance of cost recovery across D-TUoS and G-TUoS work items.

That observation aside, the high level scope described in section 4.1.3 looks reasonably comprehensive. We particularly welcome the expressed intent of assessing the impact of the new options on electricity bills for different type of network user and customer.

One suggestion we have would be to consider the categories of customer used within the charging framework. Given the changing role of demand customers (e.g. storage, vehicle to grid charging, private wires), we'd suggest that the customer category types are diversifying. In effect, there are more varied users trying to use the system in more varied ways. This process should give some consideration to how these different users could be accommodated within the new network tariff regime.

8. Acknowledging that resources are finite, are there any other areas that should be included in, or excluded from, the in-scope and out-of-scope areas for the review? If so, please explain your reasoning.

See response to question 7.

Future Developments of the Electricity Networks and their Implications for Tariff Structures

9. How do you see the use of the electricity networks in Ireland changing and developing in the future?

Section 5.3 of the 2021 paper represents a reasonable summary of the landscape. CRU should be commended for the clear care and thought that went into its preparation. There have been some recent updates (e.g. EU rules on aggregating consumer renewable loads – collective self-consumption) and reviews in other countries (referenced below) which should be considered.

10. In your view, are there any drivers of change in the future use of the electricity networks that the CRU hasn't covered in this paper? If so, please identify them and explain your answer.

There is a movement towards strategic co-location of network, generation and demand across the sector. Whether a plan-led approach to network development, an energy park or some other concept, network charging at the point of import and export to the network will need to reflect these new arrangements.

The concepts of private wires and hybrid renewables/renewables-storage have advanced substantially from when the 2021 paper was produced.

11. How do you think the roles of different parties/stakeholders across the networks will change in the coming years?

Onsite storage (including electric vehicles) and renewables have a transformative role on both large scale and smaller users. Commercial and industrial players move from customers to looking more and more like an energy utility asset – for example a large food and drink company installing a 14MW behind the meter solar farm.

12. How could changes to the electricity network tariff structures facilitate and/or encourage a whole system approach to network investment, network management and system operation? Please explain your answer.

See comments above on need for coherence and review of GTUoS in a manner consistent with the DUoS oriented proposal.

13. How do you foresee the increasing uptake of behind-the-meter generation for the purpose of self-consumption changing the load profile of electricity consumers, particularly domestic electricity consumers, in the future?

We would expect that at an individual user level, there is a greater degree of dynamism, but aggregated at network level, there is a degree of consolidation. For example, a homeowner might not plug in at night, but at that node, most EV owners are plugging in at similar times.

One challenging question is likely to be around the larger C&I players and their level of self-consumption and storage. They're likely to respond to incentives and with solar and storage they may have greater capability to shift consumption.

A big topic for consideration should be how to transmit an economic signal so that it drives the desired outcomes.

14. What are your views on the impacts of future changes identified in this Section and their implications for electricity network tariffs?

As noted above, the dynamic retail tariff regime will need to accommodate the network tariffs and consideration should be given to a more dynamic network tariffs regime or at least creating a space where participants could conceivably make such an offering.

15. Do you think that there are implications or issues that need to be addressed for electricity network tariffs that we have not mentioned in this paper? If so, please explain what these implications are and why they need to be addressed.

Within the next price control period (prior to the successful deployment of the investment envisaged within PR6) we are likely to see some stiff increases in curtailment and constraint plus potential interruptions due to weather conditions (for example the intensifying outage durations due to storms). These factors frame: a) the legitimacy of a charging regime for users (e.g. customers experiencing sustained interruptions being asked to pay for a network they see as failing them); and b) volumes of electricity for cost recovery. The review may need to factor how these considerations impact on tariffs.

16. How do you think changes to the electricity network tariff structures could help stakeholders avail of opportunities opening up due to future changes to the electricity networks?

Ensuring that participants have flexibility in how they charge those tariffs to end users, so long as they're within a regulated envelope, could give suppliers a degree of encouragement to undertake tariff innovation and offer something more dynamic in the market akin to what we have seen from new entrants in markets like the UK.

The Current Network Tariffs

17. In your view, how do the current network tariff structures impact different types of network users? Do any network users have particular challenges or issues with the current network tariff structures? Please explain your answer.

See response to Question 6.

18. In your view, could the existing electricity network tariff structures hinder the changes that are necessary for the electricity system in the coming years? Please explain your answer.

No response

19. In your view, do the price signals within the current electricity network tariffs sufficiently affect behaviour and influence use of the electricity networks? Please explain your answer.

No. Without sufficient forward view of the costs and an obvious linked benefit to alter behaviour, the signal sent is diffuse. The key question is do the DUoS charges impact how a customer uses energy? It requires network charges working in concert with the retail price to send a sufficiently sharp signal to make it through the noise. It suggests value in encouraging suppliers to align the forthcoming dynamic tariffs with the objectives of the network tariff workstream.

Tariff Considerations

20. What are your views on the network tariff components and considerations outlined in this paper?

It reflects a good starting point for the issues that need addressing.

21. Are there additional tariff components, structures or options not described above that the CRU should consider? If so, please identify them and provide rationale.

Treatment of storage will need specific consideration. Ultimately, the process should be open to bigger questions such as the extent to which end users pay all the cost of the network. That discussion will be helpful in clarifying the philosophy underpinning the network tariff regime, whatever shape it takes moving forward.

International Review

22. Are there lessons or insights highlighted in our Advisors' Paper (CRU/21/123a) that are particularly relevant to this Electricity Network Tariff Structure Review? Please explain your answer.

23. Are you aware of any other lessons or insights from these (or other) jurisdictions that may be relevant to this review? Please explain your answer.

Clearly as noted in the original consultation, it is unusual for markets to let more than two decades pass without reviewing network tariff arrangements.

It may be worth updating the analysis from other markets. Since October 2021, we are aware of the following changes to network tariffs:

- Great Britain (UK) — Ofgem concluded the Access & Forward-Looking Charges Significant Code Review (decision 3 May 2022; changes from 1 Apr 2023). Ofgem+1
- Germany — BNetzA launched a formal review with a discussion paper (12 May 2025) and consultation. bundesnetzagentur.de+1
- Denmark — DUR approved sector Tarifmodel 3.0 (DSO methodology) on 24 Jun 2022; Energinet's design timeline documents the shift to power/capacity-based elements. Forsyningstilsynet+1
- Sweden — Ei issued a regulation on network tariff design in 2022 requiring a power-based component. Energimarknadsinspektionen
- Slovenia — New Legal Act on the methodology for network charges in force 1 Mar 2024. Gen-I
- France — CRE ran consultations through 2023–2024 and adopted TURPE 7 (effective 1 Aug 2025). Enedis.fr+2CRE+2
- Netherlands — ACM revised method decisions (impacting tariff setting) and material indicates ToU at TSO level since 1 Jan 2025, with stepwise DSO changes. ACM+1
- Belgium (Flanders) — VREG developed the 2025–2028 DSO tariff methodology (consultations/reports 2023–2024). VREG
- Portugal — ERSE updated the Electricity Tariff Regulation (Reg. 828/2023, amended 39/2025). Erse

Interactions with other policies

24. In what ways could changes to the electricity network tariff structures interact with other regulatory policies and arrangements?

Addressed under other questions.

Developments Since Call for Evidence CRU/21/123

25. Please identity developments since the publication of CRU/21/123 which you consider are relevant to the review and advise of why and how you think they should be considered during the review.

Please note response to question 23.

There has been clear progress in onsite generation and storage, with the growth of LEUs really starting to progress.