



Government of Ghana

ENERGY SECTOR RECOVERY PROGRAM (P173258)

STAKEHOLDER ENGAGEMENT PLAN

**FOR
INVESTMENT PROJECT FINANCING (IPF) COMPONENT**

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LIST OF ACRONYMS

ACEP	African Center for Energy Policy
CSO	Civil Society Organizations
DISCOs	Distribution Companies
EC	Energy Commission
ECG	Electricity Company of Ghana
EPA	Environmental Protection Agency
ESIA	Environmental & Social Impact Assessment
ESMS	Environmental & Social Management System
ESRP	Energy Sector Recovery Program
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
FBO	Faith-Based Organizations
GDP	Gross Domestic Product
GHACCO	Ghana Alliance for Clean Cooking
GM	Grievance Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
IPF	Investment Project Finance
IT	Information Technology
KfW	Credit Institute for Construction
KNUST TCC	Kwame Nkrumah University of Science and Technology - Technology Consultancy Center
km	Kilometers
kV	Kilo-volt
kVA	Kilo-volt Ampere
LI	Legislative Instrument
LVD	Land Valuation Division
LRD	Land Registration Division
MCC	Meter Control Center
MDA	Ministries, Departments & Agencies
MDMS	Meter Data Management System
MMDA	Metropolitan, Municipal & District Assemblies
NEDCO	Northern Electricity Distribution Company
NGO	Non- Governmental Organization
PAP	Project Affected Person/Party
ECG	Power Distribution Services
PER	Preliminary Environmental Report
PLWA	Persons Living with AIDS
PforR	Program for Results
PRO	Public Relations Officer
PURC	Public Utilities Regulatory Commission
ROW	Right of Way
SEP	Stakeholder Engagement Plan
SIGA	State Interest and Governance Authority
SHE	Safety, Health & Environment
SLT	Special Load Tariff
WB	World Bank

EXECUTIVE SUMMARY

The World Bank (WB) is planning to support a subset of the Government of Ghana's (GoG) Energy Sector Recovery Program (ESRP). The Program will be financed through a Program-for-Results Financing (PforR), with some components to be financed under an Investment Project Financing (IPF). The Program's Development Objectives (PDO) are to improve the financial viability of the electricity distribution sector in Ghana and to increase access to clean cooking solutions.

The IPF component under the PforR is aimed at increasing the efficiency of investments and supporting the implementation of Ghana's ESRP. Key investments are required to reduce electricity losses and improve the performance of the distribution utilities. Specifically, the IPF will support the supply and installation of smart pre-paid meters and associated software, enhance meter management systems, Information Communication Technology (ICT) hardware to improve the operational efficiency of the Electricity Company of Ghana (ECG) and Northern Electricity Distribution Company (NEDCo), and to provide Technical Assistance (TA) in that regard. The IPF component will also provide TA to support the implementation of the National Liquefied Petroleum Gas (LPG) Promotion Program (NLPGPP), including covering consultancy, operational, and capacity-building costs involved.

The IPF component involving the procurement of meters and upgrade distribution systems will be implemented by ECG's Project Implementation Unit (PIU), and ECG will be the implementing agency that is responsible for the management of funds, as well as for the procurement and installation of the meters, management of environmental and social risks, and therefore, implementation of the stakeholder engagement requirements. However, due to the need to streamline procurement processes, ECG has signed a Memorandum of Understanding (MoU) with NEDCo to procure and install pre-payment meters for NEDCo's customers, including some non-strategic Ministries, Departments, and Agencies (MDAs) within NEDCo's areas of operation. The Northern Electricity Distribution Company also collaborates with ECG and the PCU in stakeholder identification, analysis, and development of the SEP. NEDCo will therefore collaborate with ECG in the implementation of this SEP. All these activities will be under the supervision of the Project Coordinating Unit (PCU) of the Ministry of Energy (MoEn)

Objectives of the SEP

The overall objective of the SEP is to provide the roadmap for project communications and active consultations with stakeholders to engage them in the design and delivery of the project. The SEP will describe ways the project team will engage with stakeholders and include a mechanism by which people can raise concerns, provide feedback, or complain about any activity related to the project. The SEP will support project activities related to a communication, mobilization, and community engagement campaign to raise public awareness. The Project will engage in meaningful consultations on policies, procedures, processes, and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable, and accessible information, including information on project-related risks. Some of these risks include sexual exploitation and abuse (SEA) as well as sexual harassment (SH), risks of increase of SEA/SH, and the proposed reporting and response measures, with a particular focus on vulnerable groups, including the elderly and those with limited mobility such as Persons with Disability, as well as women and children.

Policies, Regulations, and Standards

The key laws or regulations in Ghana that mandate public consultation and engagement regarding this project include the 1992 Constitution of Ghana, Persons with Disability Act 2006 (Act 715), Commission on Human Rights and Administrative Justice (CHRAJ) Act 1993 (Act 456), the Right to Information (RTI) Act, 2019 (Act 989), the Environmental Protection Agency (EPA) Act, 1994 (Act 490), the Environmental Assessment (EA) Regulations, 1999 (LI 1652). The 1992 Constitution of Ghana acknowledges the right to information under Article 21(1) (f) as a fundamental human right of all citizens. The EPA Act grants citizens the right to be informed about any development project that has significant negative environmental or social consequences, whether such a project is to be carried out by private or public institutions. The EA Regulations require effective public consultation and participation as an integral component of the Environmental Impact Assessment (EIA) activities. Similarly, Act 715 guarantees persons with disability rights to non-discrimination to access public goods and services and in relation to access to information and meaningful consultations. Similarly, the CHRAJ Act seeks to protect the public from unfair treatment and violation of fundamental human rights and freedoms in all forms and to investigate claims of the same against private and public entities among others.

Stakeholder Identification and Analysis

Considering the scope of the project to be undertaken, the stakeholders can be categorized as follows:

- **Project Affected-Parties (PAPs):** These are institutions or groups or individuals who are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project activities, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Stakeholders under this category include:
 - a) Special Load Tariff (SLT) consumers in affected locations (i.e., consumers above the threshold of 100kVA. These are mostly industries and form a minority of PAPs under this project).
 - b) Non-Special Load Tariff (Non-SLT) consumers in affected locations (i.e., consumers below the threshold of 100kVA. These include residential customers, Lifeline Power Consumers, and Small and Micro Enterprises (SMEs)).
 - c) Small and Micro Enterprises (SMEs) and their employees
 - d) Non-strategic Ministries, Departments, and Agencies in affected locations
 - e) Metropolitan, Municipal District Assemblies (MMDAs) affected locations.
 - f) Association of Ghana Industries (AGI)
 - g) The public

The Project Affected Parties also include vulnerable groups or persons who may be disproportionately impacted or further disadvantaged by the Project activities as compared with any other groups due to their vulnerable status and may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes under the Project. Identifiable vulnerable persons and groups under this Project include:

- h) People living with disability (PwDs)
 - i) Lifeline Power Consumers
 - j) Women
 - k) Aged/elderly
 - l) Youth
 - m) Widows
 - n) People living in remote/ less accessible areas.
 - o) People with low or no formal education.
- **Other Interested-Parties**

These are institutions, groups, or individuals who may not experience direct impacts from the Project activities, but whose interests may be affected by the Project activities. Interested Parties could also influence the process of the Project's implementation in various ways. These stakeholders include the following:

- a) Ministry of Energy (MoEn)
- b) Energy Commission (EC)
- c) Public Utility Regulatory Commission (PURC)
- d) Environmental Protection Agency (EPA)
- e) Electricity Company of Ghana (ECG)
- f) Northern Electricity Distribution Company (NEDCo)
- g) Meter Suppliers/Vendors/Installers
- h) World Bank (WB)
- i) Metropolitan, Municipal, and District Assemblies (MMDAs)
- j) Ghana National Fire Service (GNFS)
- k) Commission on Human Rights and Administrative Justice (CHRAJ)
- l) Domestic Violence and Victims Support Unit (DOVVSU)
- m) State Interest and Governance Authority (SIGA)
- n) Civil society Organizations (CSOs)/ Non-Governmental Organizations (NGOs) in the energy sector (e.g., African Center for Energy Policy (ACEP))
- o) Media
- p) Law enforcement agencies (e.g., police)
- q) Traditional Authorities
- r) Association of Ghanaian Industries (AGI)

The stakeholders engaged in the preparation of this SEP provided inputs on the potential Environmental and Social (E&S) risks and impacts relating to the installation of the meters by ECG and NEDCo under the IPF component. These stakeholders also participated in consensus building on the mitigation and management of the E&S issues raised. Stakeholder engagement is expected to be an ongoing process throughout the life cycle of the project. Initial engagements were held with some agencies notably, the EPA, PURC, Association of Ghana Industries (AGI), and African Center for Energy Policy (ACEP). Their concerns ranged from making electricity affordable and ensuring effectiveness in revenue collection. EPA is concerned about the capacity of the energy sector to manage the environmental and social issues concerning the project. While feedback from stakeholders will continuously be considered in the project planning, designing, and implementation, a summary of stakeholder concerns received so far, and responses have been presented in the table below:

STAKEHOLDER/ INSTITUTIONS	INTEREST OR ISSUES/CONCERNS	STAKEHOLDERS' CONCERNS ADDRESSED IN THE PROJECT DESIGN
PURC	Some of the issues that have defined the energy sector include the historical antecedents of pricing from free, to subsidized, and to market pricing; tariff adjustment during election years; the inability of the utility to collect the approved tariffs; industry paying more	The new replacement meters to be installed are prepayment meters. These meters will enhance revenue collection from the MMDAs who hitherto were using postpaid meters.

than the cost of their service; and load shedding as a precursor to tariff increases.

AGI

The AGI indicated that Ghana's electricity tariffs are among the highest in West Africa and that any upward adjustment will be detrimental to the fortunes of the industry, particularly small and medium-scale enterprises (SMEs). AGI indicated the need for reliable and efficient service delivery and for a tariff regime that is structured in a manner so the utility service providers can recover the cost to remain viable. It added that the current arrangement wherein residential consumers are subsidized by industry is counterproductive because it burdens manufacturers and affects business competitiveness. The association also indicated that for its members to adequately compete under the Africa Continental Free Trade Area (AfCFTA), electricity tariffs would have to be revised downwards.

The target of this project is the reduction of commercial losses and improvement in operational efficiency, hence, when that is achieved, this will contribute to reliable and efficient service delivery to customers and may influence future tariff decisions. The target of reduction after the implementation of this project after the first year is 1%. This reduction will translate to about GHS87,000,000.00.

ACEP

The revenue losses from illegally connected meters worsen the already high commercial losses being experienced in the power sector, which has manifested in the financial distress the sector is currently faced with. This raises the need for quick reforms in addressing the challenge of illegally connected SHEP meters and the wider problem of illegal connections and non-payment for power consumption. The government's action on renewable energy has been negatively impacted by the excess capacity burden it faces. As a result, the government has extended its suspension of renewable energy Power Purchase Agreements (PPA) to licenses for embedded generation (private arrangements between renewable energy suppliers and consumers). This is aimed at sustaining demand for grid electricity to account for the excess capacity over time even though increasingly, renewable

The new meters to be installed have anti-tamper devices. Obsolete meters which are highly consuming will be replaced with smart meters. Non-AMR (Automated Meter Reading) meters will be replaced with AMR meters for large customers (above 6000kWh/month. These meters can be monitored remotely and help reduce power theft.

The issue of excess capacity will be addressed with increasing growth in electricity demand, supported by the reduction in constraints in service delivery which is an aim of this project.

Enhancing revenue collection through the replacement of postpaid meters with prepayment meters, installation of anti-theft meters, and the replacement of faulty and obsolete meters will lead to improvement in collection rates, reduction in losses of ECG's operations, and a positive impact on

energy is becoming a more competitive option for small businesses. ECG's overall operations. This may influence future tariff outcomes.

Reduction in tariffs may remotely attract investors and encourage consumers to utilize more energy.

EPA A capacity-building program can be developed for the energy sector after a training needs assessment is done to identify key areas that need attention. HSE Capacity needs for ECG and NEDCO have been conducted and presented to the WB for consideration and funding.

The EPA faces challenges monitoring the energy sector projects due to inadequate staff and financial restraints.

Stakeholder Engagement Program

The Table below is a summary of the overall stakeholder engagement approach under the project. It is organized according to categories per the stakeholders' engagement prioritization criteria, and provides the engagement goals, methods of engagement, information to be shared, and the frequency of engagement.

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
Environmental Protection Agency (EPA) Ghana	Accepted waste management practices must be approved for managing electronic and electrical wastes generated.	Engagement would take the form of formal correspondence, meetings, and site visits. The engagement process will be led by the SHE Division/E&S Unit of ECG/NEDCO.	<ul style="list-style-type: none"> i. Project E&S documents and reports. ii. Information on the type and quantities of electrical and electronic wastes generated from the project and the management procedures used. 	As and when required
PURC, and Energy Commission	Electrical wiring, and electricity service delivery key performance indicators must be met during the project implementation.	Formal correspondence, and periodic reporting on service delivery indicators	<ul style="list-style-type: none"> i. Technical Summary of the project including Meter Specifications, etc. ii. Work Schedules including planned outage schedules. iii. Operations Situational Reports (System Average Interruption Duration Index (SAIDI), Customer Average Interruption Duration Index (CAIDI)) 	<p>As and when required.</p> <p>As and when required.</p> <p>Monthly</p>

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
GNFS	The need to collaborate with GNFS to manage potential risks such as fires emanating from meter tampering and how such fires can be prevented as well as a protocol to notify GNFS on occurrences and locations of fire outbreaks	Face-to-face meetings Through toll-free numbers	i. Non-technical executive summary of project-related fire safety documents and reports. ii. Technical specifications of meters iii. Fire risk of the project iv. Location and type of fire	As and when required.
CHRAJ, DOVVSU	The risk of abuse of the rights of workers of meter suppliers, customers/ electricity users is eminent in the project. There should be an effective Grievance Redress Mechanism (GRM) in place to ensure prompt and fair resolution of grievances/ complaints. To map and integrate these agencies into the GBV/SEA/SH procedures, for purposes of referring relevant GBV/SEA/SH cases to them when they occur.	Face-to-face meetings and official correspondences on issues of Gender Based Violence (GBV)	i. GBV risks on the projects ii. The project's GRM, and referral procedure iii. Unresolved complaints	As and when required
Metropolitan, Municipal, and District Assemblies (MMDAs) Government	Planned outages required for the metering activities can disrupt businesses and by extension reduce the revenue of the MMDA that collects taxes from the local businesses. The MMDAs have jurisdiction over the management of waste. Electronic and electrical waste management practices on the project must be cleared with them.	Engagements can take the form of formal correspondence, meetings, and site visits. The engagement process will be led by the SHE Division of ECG/ E&S Unit of NEDCO.	i. Non-technical executive summary of project documents and reports. ii. Work Schedules including planned outage schedules, iii. Type and quantity of waste to be generated from the projects and management practices to be used	Before and after the commencement of works Throughout the project cycle Before the commencement of project works

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
CSOs, NGOs, Religious and faith-based organizations, AGI, Media	CSOs, NGOs, and faith-based organizations tend to be advocates for good practices and advocates for the vulnerable and disadvantaged groups in society. Consultation with these groups improves the acceptance of information to share with the public.	Public meetings, media soirees, and focused group discussions. The engagement process will be led by the SHE Division / E&S Unit of ECG / NEDCO.	i. Non-technical executive summary of project documents and reports. ii. Technical Reports iii. Outage schedules	As planned by the Regional or District Office.
Customers, Businesses, and the Public	Planned outages can create inconveniences and disrupt business activities. There are instances where food goes bad because of an extended outage. The security of neighborhoods is compromised because of outages.	i. Electronic and print media announcements. ii. Public address systems mounted on vehicles driving through the affected neighborhood in appropriate local languages. iii. Notices on the website and social media platforms iv. Customer service centers, Faults sections, and offices v. The engagement process will be led by the SHE Division of ECG / E&S Unit of ECG/NEDCO.	i. Non-technical executive summary of project documents and reports. ii. Approach to implementation of the e-waste management plan in the ESMF. iii. Work Schedules including planned outage schedules, iv. GRM	Throughout the project cycle
Internal Stakeholders (Directorates and Departments within MoEn, ECG/NEDCO)	Internal stakeholders need to understand the objectives of the project and make meaningful contributions to the design. They also need to understand the Environmental and	i. Staff sensitization ii. Memos	i. Technical summary of the project ii. Plans for managing environmental and social risks and impacts of the project.	Throughout the project cycle

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
	Social Risks, and the GRM in place for the project		iii. GRM	

Implementation of the SEP

The ECG PIU will be the implementing agency responsible for procuring and installing the meters, managing environmental and social risks, and therefore, responsible for the implementation of the SEP. However, for areas under the jurisdiction of NEDCo, NEDCo will collaborate with ECG and the PIU in the implementation of this SEP.

Grievance Mechanism

The SEP has described a Grievance Mechanism (GM) to deal with grievances and complaints. The project beneficiary agencies (i.e., MoEn and ECG/NEDCO) will employ transparent procedures to deal with inquiries and complaints received from stakeholders. The GRM will address concerns promptly, using an easy-to-understand and transparent process that is culturally appropriate and readily accessible and that meets the needs of the disadvantaged and vulnerable groups, and at no cost and without retribution. It will include mediation as an option where users are not satisfied with the proposed resolution and will not impede access to the already established judicial and administrative remedies.

The plan has taken into consideration existing grievance mechanisms such as the spatial web-based map indicating Gender-Based Violence service providers for GBV redress in the Greater Accra Region. The beneficiary agencies have been identified and assigned specific roles they will play in the SEP implementation.

Monitoring and Reporting

The project agencies will employ a monitoring and reporting framework in the execution of the SEP. The framework sets specific Key Performance Indicators (KPIs) that will be monitored by the project regularly concerning the engagement measures proposed in this SEP. The indicators relate to E&S assessments, stakeholder engagement, personnel, ESMS, Grievance Mechanisms, and Monitoring and Communication.

Stakeholders' involvement in monitoring is considered, hence provisions are made in the SEP to solicit responses and feedback from the various stakeholders.

1.0 INTRODUCTION

This Stakeholder Engagement Plan (SEP) outlines the strategies and approaches to be used in engaging with all stakeholder groups for the IPF components of the project and activities within the purview of the Electricity Company of Ghana (ECG), Northern Electricity Distribution Company (NEDCO) and the Project Coordinating Unit (PCU) at the MoEn respectively. As per the World Bank's Environmental and Social Standard (ESS) 10, stakeholder engagement is the basis for building a strong, constructive, and responsive relationship that is essential for the successful management of project-related environmental and social impacts. Thus, effective stakeholder engagement will lead to successful project design and implementation and improve the sustainability of the project. This stakeholder engagement plan also recognizes the importance of open and transparent engagement between the beneficiaries (ECG, NEDCO, and the PIU) and project stakeholders as an essential element of good international practice.

This SEP is focused and applicable to the MoEn, ECG's, and NEDCO's proposed IPF activities which is part of Ghana's Energy Sector Recovery Program (P173258) to be financed under the World Bank's Program for Result (PForR) financing instrument.

1.1 Background

Over the last two decades, Ghana has implemented extensive power sector reforms, which have successfully attracted significant private sector participation in power generation. This coupled with the previous power crises which fast-tracked investments have made Ghana one of the countries in Sub-Saharan Africa with the highest rate of energy access.

Fast-rising public debt, low revenue mobilization, and an increased financial burden on the energy sector are some of the key economic challenges in Ghana.

In recent years, with low collection rates, high losses, and non-cost-recovery tariffs, as well as chronic inflation and currency depreciation without automatic tariff adjustments, the Ghanaian energy sector has become a fiscal burden for the government, costing the national budget 1-2 percent of GDP. Over the past few years, the direct subsidy requirement of the energy sector has been in excess of a billion dollars annually.

In 2019, ECG's total energy losses were around 25 percent, with revenue collection rates around 90 percent. Hence, ECG urgently needs to improve its performance, both in terms of its high electricity losses and the quality of service.

In 2019, the Cabinet adopted the Energy Sector Recovery Program (ESRP) as the government's roadmap to restore and sustain governance and financial viability of the energy sector, as well as to attract competitive private sector investment. The Energy Sector Recovery Program (ESRP) is a roadmap to achieving the financial viability of the sector. This GoG program sets out the immediate, near-term, and medium to long-term actions needed to achieve the Government's aim to bring energy sector finances into balance by the end of 2023. This is based on a two-pronged approach to simultaneously reduce costs and raise revenues. It also formalizes the commitment of GoG to fund the annual sector financial shortfall (using sector stabilization payments from the Budget), beginning in 2021 until the sector is in balance, to prevent further accumulation of arrears.

In past years, the World Bank has supported the energy sector in Ghana with a focus on the security of electrical power supply, and increased access to electricity and regional power exchanges, while

financing actions to improve the operational and commercial performance of the main electricity distribution utility, ECG, other State-Owned Enterprises (SOEs) and energy regulators.

Going forward, to support GoG in achieving tangible results related to the financial recovery of the sector, a Program-for-Results (PforR) is deemed to be the most appropriate instrument for the proposed operation. An Investment Project Financing (IPF) component under the PforR will increase the efficiency of investments and support the implementation of the ESRP Program. Key investments are required to reduce electricity losses and improve the performance of the Distribution Utility Companies (DISCOs).

1.2 Project Description

1.1.1 The Energy Sector Recovery Program (ESRP)

The ESRP is a roadmap for the Government of Ghana to achieve the financial viability of the sector. The program sets out the immediate, near-term, and medium to long-term actions needed to achieve the Government's aim to bring energy sector finances into balance by the end of 2023.

1.1.2 Program-for-Results (PforR)

The scope of the proposed PforR program is a subset of the broader ESRP. The program will build on activities of the ESRP aimed at the immediate objective of making the sector financially viable, and help achieve several of the medium-term objectives to:

- a. ensure the sector arrears are stabilized and funded.
- b. reduce the cost of power generation.
- c. reduce electricity losses and increase revenue collection of the distribution utilities (ECG and NEDCO).
- d. improve governance of ECG and,
- e. increase access to Liquefied Petroleum Gas (LPG) as the primary cooking fuel

The program will align with the ESRP's objective of maintaining liquidity across the value chain and reducing sector arrears through a funding plan from GoG. It will also support ESRP measures to improve the performance and financial viability of the utilities. The program will include the results of ESRP actions related to generation cost reduction and increased revenues of the distribution companies. In addition, the program will have a direct effect on reducing the power sector revenue shortfall by improving electricity losses and revenue collection, over 2022-2025.

The PforR under ESRP covers part of the Performance Improvement Programs (PIPs) of ECG related to:

- a. consumer metering (excluding meters financed under the IPF component or other bilateral funding) and distribution transformer metering;
- b. GIS indexation;
- c. ICT integration between ERP and several commercial systems; and
- d. Rehabilitation of ECG network (LT-ABC cabling in high-loss areas, distribution transformer upgrade, LT line rehabilitation)

1.1.3 The IPF Component

The IPF component will finance priority investments needed to reduce the electricity losses of the main distribution companies (ECG and NEDCO) and to realize improvement in utility performance.

There will be investments in equipment and systems to reduce commercial losses as well as adopt and enforce the right operational processes to systematically monitor consumption at the end-user level. These are categorized under two sub-projects namely commercial loss reduction and ICT enhancement projects.

1.2.3.1 Commercial Loss Reduction Investments

The activities under this category are targeted at addressing the commercial loss challenges within the ECG and NEDCo. The activities will be mainly implemented by ECG PIU. However, NEDCo will implement the installation of prepayment meters and an activity under the Commercial Loss Reduction Project. The commercial loss reduction intervention under the IPF would be implemented in the Accra East and Tema operational regions of ECG. This project involves:

- a. Installing smart load limiters for lifeline customers.
- b. Replacement of older meters older than 10 years.
- c. Replacement of residential meters that are non-MMS (Meter Management System) compliant.
- d. Replacement of Ministries, Department, and Agencies (MDAs) meters to smart and MMS compliant.
- e. Replacement of all EDMR meters for Automated Meter Reading (AMR) and High-consuming customers with MMS-compliant smart postpaid meters.

The Northern Electricity Distribution Company, NEDCo, will also benefit from the commercial loss reduction project. The Northern Electricity Distribution Company has reached a Memorandum of Understanding (MoU) with ECG to implement this activity on their behalf in the areas under the jurisdiction of NEDCo.

Under this arrangement, NEDCo will implement the installation of prepayment meters for non-SLT non-strategic MDAs in the northern electricity distribution sector¹ of Ghana.

1.2.3.2 Information Communication Technology (ICT) Enhancement

The ICT enhancement project seeks to improve the financial and operational performance through the enhancement and integration of the Customer Management System (CMS) and Meter Management System (MMS) of ECG with industry-standard applications.

1.2.3.1 Technical Assistance IPF Component

The IPF component also comprises Technical Assistance (TA) activities to be implemented by the Ministry of Energy. Institutions to benefit from this include the Public Utility Regulatory Commission (PURC), Ghana Grid Company (GRIDCo), Ministry of Energy (MoEn), ECG, State Interest and Governance Authority (SIGA), National Petroleum Authority (NPA), etc.

¹ The Northern Distribution sector for electricity distribution are geographical areas covering Ahafo, Brong-Ahafo, Bono East, Savannah, Upper West, and Upper East Regions.

Table 1: Technical Assistance IPF Component and Beneficiaries

Item	Action	Beneficiary Agency
1	PURC Technical Assistance support through embedded advisor or training (TBD by PURC)	PURC
2	PURC real-time access to utility data	PURC
3	PURC Communication Support	PURC
4	Merit Order Dispatch and Settlements system	GRIDCO
5	Audit for the energy sector shortfall (energy sector debt matrix)	ESRP
6	ECG Cash Waterfall Mechanism Secretariat (Accountant and Financial Analyst)	ESRP
7	Transaction Advisor for ECG MBC outsourcing	MoEn
8	Training to SIGA staff, ECG Board, and Senior Management on Corporate Governance	SIGA/ECG
9	Evaluation of GRC and Performance Status of ECG	SIGA
10	ECG Organizational Audit (500k)	SIGA
11	ECG improvement of Performance Scorecard and Performance Management System (300k)	SIGA
12	Capacity and business development support to Clean cooking enterprises	GHACCO
13	Implementation of nationwide LPG customer education and behavior change communications	NPA
14	Support to the Kumasi Stove Testing Labs to be ISO compliant	KNUST-TCC
15	National Clean Cooking Policy Development + Data Collection by the Ghana Statistical Service	MoEn
16	ESRP Strategic Communication	ESRP
17	Project Management/ Operational Support (Clean Cooking)	PCU
18	Independent verification (ESRP IVA @ 500kUSD; NLPGPP KHRC)	PCU
19	Stakeholder engagement and communication activities on ESRP implementation	ESRP

1.1.4 Institutional Arrangement

The IPF of the PforR program is specifically an energy sector program, however, it has a multi-sectoral implication. Because of this, there are other institutions outside the energy sector that are participating in the program as beneficiaries.

The IPF component involving the procurement of meters and upgrade distribution systems will be implemented by ECG's PIU, and ECG will be the implementing agency that is responsible for the management of funds, as well as for the procurement and installation of the meters, management of environmental and social risks, and therefore, implementation of the stakeholder engagement requirements. However, due to the need to streamline procurement processes, ECG has signed an MoU with NEDCo to procure and install pre-payment meters for NEDCo's customers, including some non-strategic Ministries, Departments, and Agencies (MDAs) within NEDCo's areas of operation. NEDCo will also collaborate with ECG and the PIU implementation of this SEP.

Implementing agencies and beneficiary institutions of the Technical Assistance (TA) component of the IPF program include MoEn, the PIU, ECG, ESRP, PURC, National Petroleum Authority (NPA), State Interest and Governance Authority (SIGA), Kwame Nkrumah University of Science and Technology Consultancy Center (KNUST TCC), Ghana Alliance for Clean Cooking Stove (GHACCO), etc. The TA will support consultancy, operational costs, and capacity-building activities.

All these activities will be under the supervision of the Project Coordinating Unit at the Ministry of Energy.

1.3 Objectives

1.1.5 Objectives

The objectives of the SEP are to:

- a. Establish and maintain a constructive relationship with all categories of stakeholders.
- b. Ensure that all communities affected by the company's operations have the opportunity to provide input, consent, and suggestions on actions that could affect their lives.
- c. Ensure all project-affected communities and interested parties are provided with the opportunities and platforms to express their views on the project through a process of continuous involvement, as well as establishing mechanisms to provide feedback to them on how their contributions were considered.
- d. Ensure focused and inclusive engagement with men, women, the elderly, youth, displaced persons, vulnerable and disadvantaged persons, or groups.
- e. Ensure timely disclosure of free, relevant, transparent, objective, meaningful, and easily accessible information in appropriate local language(s) and format that is understandable to affected communities and interested parties to help them participate in the project design and implementation processes meaningfully.
- f. Establish an efficient feedback mechanism for receiving and addressing grievances promptly with particular attention to vulnerable groups.

1.1.6 Proposed Measures to Ensure Effective Stakeholder Engagement

Based on the above objectives the PCU and the Implementing Agencies shall;

- i. Ensure regular, free, timely, accessible, and appropriate dissemination of information to all stakeholders particularly to directly affected persons and groups in advance of consultation and decision-making activities.
- ii. Ensure planned and transparent consultation where necessary, with appropriate notification, clear disclosure of objectives, and an agreed process of interaction, recording, and follow-up.
- iii. Ensure that consultations are fully socially inclusive by ensuring that women, youth, the elderly, and other vulnerable groupings are covered.
- iv. Provide an avenue for the Stakeholders to make inputs into the planning and implementation of subprojects.
- v. Incorporate feedback into project designs, and report back to stakeholders when required.
- vi. Ensure a two-way dialogue that allows both sides to exchange views and information, to listen, and to have their issues heard and addressed.
- vii. Promote healthy agreements and partnerships through the mutual identification of areas of cooperation, and the pursuit of good faith negotiation in this context.
- viii. Report regularly and in a structured manner to all affected stakeholders and interested parties, with special attention to appropriate forms of reporting among vulnerable people.
- ix. Establish clear and accessible mechanisms for responding to people's concerns, suggestions, and grievances.

1.4 Guiding Principles of the SEP

This SEP is developed based on the World Bank's Environmental and Social Standard 10. Principles of good consultation stipulate that an effective consultation is a two-way process that should:

- a. Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise.
- b. Be based on the prior disclosure and dissemination of free, prior, relevant, transparent, objective, meaningful, and easily accessible information, which is presented in a culturally appropriate manner, made available in local language(s), and offered in a format understandable to the Affected Communities.
- c. Focus on the inclusive engagement of those directly affected as opposed to those not directly affected.
- d. Be free of external manipulation, interference, coercion, or intimidation.
- e. Enable meaningful participation, where applicable; and
- f. Be documented.

1.5 Regulatory and Other Requirements for Consultation and Disclosure

- i. The 1992 Constitution² of Ghana under Article 21 (1) (f) identifies the right to information as a fundamental right to all persons. This article of the constitution,

² The 1992 Constitution of Ghana is the supreme law of the state, and all powers of the state are derived from this constitution. It provides for protection of the people.

therefore, gives the beneficiaries and interested parties to this program the right to know once they are consulted.

- ii. The Right to Information Act, 2019 (Act 989) actualizes the provision in the 1992 constitution of Ghana on the fundamental right to information subject to the exemptions that are necessary and consistent with the protection of the public interest in a democratic society, to foster a culture of transparency and accountability in public affairs and to provide for related matters.
- iii. Commission on Human Rights and Administrative Justice (CHRAJ) Act, 1993 (Act 456)
This Act established the Commission on Human Rights and Administrative Justice. Act 456 mandates CHRAJ to investigate complaints of violations of fundamental human rights and freedoms, injustice and corruption; abuse of power, and unfair treatment of persons by public officers in the exercise of their duties, with the power to seek remedy in respect of such acts or omissions and to provide for other related purposes.
- iv. Persons with Disability Act, 2006 (Act 715)
The Persons with Disability Act is an act to provide for persons with disability, to establish a National Council on Persons with Disability, and to provide for related matters. The Act covers key thematic provisions such as rights, accessibility, employment, and education for PWDs amongst others.
- v. Public Utilities Regulatory Commission (Consumer Service) Regulation, 2020, L.I. 2413

The Legislation is purposed to provide for a transparent regulatory framework to ensure a safe, adequate, efficient, reasonable, and non-discriminatory service and an enforcement framework to ensure the quality of service to the consumer.
- vi. Electricity Supply And Distribution (Technical And Operational) Rules, 2005 (L.I. 1816).

The Legislative Instrument sets out the rules or practices for the supply and distribution of electricity. It covers issues such as the reliability of the electricity supply, the system voltage, the meter, payments, etc.
- vii. Electricity Supply And Distribution (Standards and Performance) Regulations 2008 (L.I. 1935).
The Legislative Instrument provides for performance benchmarks for electricity supply and distribution in conformity with the provisions of Electricity Supply And Distribution (Technical And Operational) Rules, 2005 (LI 1816).

This regulation and the rule shall be relevant to the handling of outages and metering complaints received from customers.
- viii. Public Utilities (Complaints Procedure) Regulations, 1999 (L.I. 1665)

The regulation specifies the procedures by which the utility company or a consumer may lodge a complaint with the PURC. The complaints procedures in this document must conform to the procedures specified in this regulation.

ix. Alternative Dispute Resolution Act, 2010 (Act 798)

An Act to provide for the settlement of disputes by arbitration. Mediation and customary arbitration, to establish an Alternative Dispute Resolution Centre, and to provide for related matters. The Alternative Dispute Resolution Act 2010 (Act 798) gives parties to an arbitration agreement autonomy to determine rules and procedures. However, there are a few mandatory provisions: Section 2(3) of Act 798 requires that an arbitration agreement be in writing.

x. Ghana Environmental Assessment Regulation³ Legislative Instrument (L.I.) 1652 (1999)

The Regulation requires effective public consultation and participation as an integral component of the Environmental and Social Impact Assessment (ESIA) procedures. Project proponents are required by law to engage effectively and continuously with potential project-affected persons, communities, and other stakeholders to ensure issues of concern to them are addressed in project design and implementation.

xi. The Environmental Protection Agency (EPA) Act 1994 (Act 490)

The Environmental Protection Agency (EPA) Act 1994 (Act 490)⁴ also grants citizens the right to be informed about any development project that has significant negative environmental or social consequences, whether such a project is to be carried out by private or public institutions. The project proponents are required to engage various stakeholders including potentially affected communities, relevant national and local authorities, Non-Governmental organizations (NGOs), Civil Society Organizations (CSOs,) and other groups in the early stages of the project. This helps in the obtaining of local knowledge and addresses public views, concerns, and values that can influence the project design, which in turn increases public confidence and minimizes conflicts. Public participation is core to achieving an efficient and effective environmental assessment practice and implementation.

xii. World Bank's Environment and Social Standards (ESS10)

The World Bank's Environment and Social Standards⁵ (ESS10) recognizes the importance of open and transparent engagement between a borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance

³ The Environmental Assessment Regulation was promulgated to give full legal backing to Environmental Impact Assessment in Ghana. This ensures that the environment is protected from the adverse impacts that may arise of any project

⁴ The EPA Act is the creator of Ghana's Environmental Protection Agency and mandated the agency to regulate and ensures the implementation of Government's policy on the environment.

⁵ The World Bank's ESS is part of the bank's Environmental and Social framework (ESF) that enables the World Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes.

project acceptance, and make a significant contribution to successful project design and implementation. It requires borrowers to engage with stakeholders throughout the life cycle of the project and engage in meaningful consultations with all stakeholders. Accordingly, ECG, NEDCO, and the PIU will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

xiii. National Gender Policy (2015) of Ghana

The Government of Ghana (GOG) committed to the promotion of women's human rights and empowerment, guided by its commitment to International Instruments (such as the then Millennium Development Goals), the 1992 Constitution, and Ghana's National Development Frameworks. The overarching goal of this Policy is to mainstream gender equality concerns into the national development processes by improving the social, legal, civic, political, economic, and socio-cultural conditions of the people of Ghana, particularly women, girls, children, the vulnerable and people with special needs; persons with disability and the marginalized.

2.0 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

There had been an earlier engagement with some identified stakeholders regarding the PforR program. In this initial consultation, selected electricity users, regulators, electricity power consumers, and research institutions were engaged to elicit their views and concerns relating to the environmental and social impacts of the IPF activities. The purpose was to include their views and concerns in the design and implementation of the program to ensure its environmental and social sustainability. The Ministry of Energy played a key role in the engagement process.

The consultation was also meant to identify the related legal frameworks and best practices for the dissemination and disclosure of information relating to the program. Refer to Annex 1 for participants in the initial engagement process.

2.1 Feedback from Stakeholders

A previous stakeholder engagement session was conducted with selected stakeholders. The main objective of this engagement was to gather their concerns to incorporate them into the project’s planning and design. Stakeholders who participated in this session included PURC, AGI, ACEP, and EPA, among others. The concerns raised by these stakeholders are documented in Table 2.

Table 2: Previous Stakeholder Engagement and Concerns Raised.

Stakeholder/ Institutions	Interest or Issues/Concerns
PURC	Some of the issues that have defined the energy sector include the historical antecedents of pricing from free, to subsidized, and to market pricing; tariff adjustment during election years; the inability of the utility to collect the approved tariffs; industry paying more than the cost of their service; and load shedding as a precursor to tariff increases.
AGI	The AGI indicated that Ghana’s electricity tariffs are among the highest in West Africa and that any upward adjustment will be detrimental to the fortunes of the industry, particularly small and medium-scale enterprises (SMEs). AGI indicated the need for reliable and efficient service delivery and for a tariff regime that is structured in a manner that the utility service providers can recover the cost to remain viable. It added that the current arrangement wherein residential consumers are subsidized by industry is counterproductive because it burdens manufacturers and affects business competitiveness. The association also indicated that for its members to adequately compete under the Africa Continental Free Trade Area (AfCFTA), electricity tariffs would have to be revised downwards.
ACEP	The revenue losses from illegally connected meters worsen the already high commercial losses being experienced in the power sector, which has manifested in the financial distress the sector is currently faced with. This raises the need for quick reforms in addressing the challenge of illegally connected Self-Help Electrification Project (SHEP) meters and the wider problem of illegal connections and non-payment for power consumption. The government’s action on renewable energy has been negatively impacted by

the excess capacity burden it faces. As a result, the government has extended its suspension of renewable energy Power Purchase Agreements (PPA) to licenses for embedded generation (private arrangements between renewable energy suppliers and consumers). This is aimed at sustaining demand for grid electricity to account for the excess capacity over time even though increasingly, renewable energy is becoming a more competitive option for small businesses.

EPA

A capacity-building program can be developed for the energy sector after a training needs assessment is done to identify key areas that need attention. The EPA faces challenges monitoring the energy sector projects due to inadequate staff and financial restraints.

There are other stakeholders identified but yet to be consulted. The PCU and the implementing agencies believe in a continuous stakeholder engagement process and therefore would engage these stakeholders prior to project commencement, and consider their concerns in the implementation of the IPF project.

Below are lists of other identified stakeholders in the project locations who are yet to be consulted.

2.1.1 Project Affected-Parties (PAPs):

1. Non-Special Load Tariff (Non-SLT) consumer groups, including residential customers.
2. Small and Micro Enterprises (SMEs).
3. Non-strategic Ministries, Departments, and Agencies in affected locations.
4. Metropolitan, Municipal District Assemblies (MMDAs) affected locations.
5. The public.

Identifiable vulnerable persons and groups yet to be consulted include:

6. People living with disability (PwDs)
7. Lifeline Power Consumers
8. Women
9. Aged/elderly
10. Youth
11. Widows
12. People living in remote/ less accessible areas.
13. People with low or no formal education.

2.1.2 Other Interested-Parties

1. Metropolitan, Municipal, and District Assemblies (MMDAs) in affected areas
2. Ghana National Fire Service (GNFS)
3. Commission on Human Rights and Administrative Justice (CHRAJ)
4. Domestic Violence and Victims Support Unit (DOVVSU)
5. State Interest and Governance Authority (SIGA)
6. Media
7. Law enforcement agencies (e.g., police)
8. Traditional Authorities

2.2 Consideration of Stakeholders' Concerns in Project Design

The concerns raised by various stakeholders are to be factored into the planning and designing of the project. This is necessary to ensure that the IPF activities address the needs of stakeholders as far as the Revenue Protection Projects and the Clean Cooking campaign are concerned. By so doing, some of the environmental and social risks and impacts of the IPF/PforR project shall be minimized or avoided. Table 3 describes how the project addresses some of the concerns raised by stakeholders.

Table 3: Stakeholders’ Concerns to be Addressed in Project Planning and Design

STAKEHOLDER/ INSTITUTIONS	INTEREST OR ISSUES/CONCERNS	STAKEHOLDERS’ CONCERNS ADDRESSED IN THE PROJECT DESIGN
PURC	Some of the issues that have defined the energy sector include the historical antecedents of pricing from free, to subsidized, and to market pricing; tariff adjustment during election years; the inability of the utility to collect the approved tariffs; industry paying more than the cost of their service; and load shedding as a precursor to tariff increases.	The new replacement meters to be installed are prepayment meters. These meters will enhance revenue collection from the MMDAs who hitherto were using postpaid meters.
AGI	The AGI indicated that Ghana’s electricity tariffs are among the highest in West Africa and that any upward adjustment will be detrimental to the fortunes of the industry, particularly small and medium-scale enterprises (SMEs). AGI indicated the need for reliable and efficient service delivery and for a tariff regime that is structured in a manner so the utility service providers can recover the cost to remain viable. It added that the current arrangement wherein residential consumers are subsidized by industry is counterproductive because it burdens manufacturers and affects business competitiveness. The association also indicated that for its members to adequately compete under the Africa Continental Free Trade Area (AfCFTA), electricity tariffs would have to be revised downwards.	The target of this project is the reduction of commercial losses and improvement in operational efficiency, hence, when that is achieved, this will contribute to reliable and efficient service delivery to customers and may influence future tariff decisions. The target reduction after the implementation of this project after the first year is 1%. This reduction will translate to about GHS87,000,000.00.
ACEP	The revenue losses from illegally connected meters worsen the already high commercial losses being experienced in the power sector, which has manifested in the financial distress the sector is currently faced with. This raises the need for quick reforms in addressing the challenge of illegally connected SHEP meters and the wider problem of illegal connections and non-payment	The new meters to be installed have anti-tamper devices. Obsolete meters which are highly consuming will be replaced with smart meters. Non-AMR (Automated Meter Reading) meters will be replaced with AMR meters for large customers (above 6000kWh/month. These meters can be monitored remotely and help reduce power theft.

for power consumption. The government's action on renewable energy has been negatively impacted by the excess capacity burden it faces. As a result, the government has extended its suspension of renewable energy Power Purchase Agreements (PPA) to licenses for embedded generation (private arrangements between renewable energy suppliers and consumers). This is aimed at sustaining demand for grid electricity to account for the excess capacity over time even though increasingly, renewable energy is becoming a more competitive option for small businesses.

The issue of excess capacity will be addressed with increasing growth in electricity demand, supported by the reduction in constraints in service delivery which is an aim of this project.

Enhancing revenue collection through the replacement of postpaid meters with prepayment meters, installation of anti-theft meters, and the replacement of faulty and obsolete meters will lead to improvement in collection rates, reduction in losses of ECG's operations, and a positive impact on ECG's overall operations. This may influence future tariff outcomes.

Reduction in tariffs may remotely attract investors and encourage consumers to utilize more energy.

EPA

A capacity-building program can be developed for the energy sector after a training needs assessment is done to identify key areas that need attention.

The EPA faces challenges monitoring the energy sector projects due to inadequate staff and financial restraints.

HSE Capacity needs for ECG and NEDCO have been conducted and presented to the WB for consideration and funding.

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The Implementing Agencies recognize that the first and most important step in the stakeholder engagement process is the identification of the project's stakeholders, who they are, their groupings, and sub-groupings. This section describes the various stakeholders identified, the analysis of their interests, how they will be affected by the project activities, and to what degree and what influence they could have on the project's implementation. Considering the scope of the project to be undertaken, the stakeholders can be categorized as follows:

- a. Project Affected Persons (PAPs)
- b. Other Interested Parties

3.1 Stakeholder Identification

3.1.1 Project Affected-Parties (PAPs):

These are institutions or groups or individuals who are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project activities, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Stakeholders under this category include:

- a) Special Load Tariff (SLT) consumers in affected locations (i.e., consumers above the threshold of 100kVA. These are mostly industries, and form a minority of PAPs under this project).
- b) Non-Special Load Tariff (Non-SLT) consumers in affected locations (i.e., consumers below the threshold of 100kVA. These include residential customers, Lifeline Power Consumers, Small and Micro Enterprises (SMEs), etc. These form the primary group to be affected by the metering to be done by ECG/NEDCo to enhance commercial loss reduction under this project. The target is consumers with obsolete meters, non-MMS compliant meters, and lifeline consumers. This category of affected stakeholders would be impacted by the replacement of their current non-performing meters.
- c) Non-strategic Ministries, Departments, and Agencies in affected locations
- d) Metropolitan, Municipal District Assemblies (MMDAs) affected locations (Most MMDAs are billed from postpaid meters. This has resulted in MMDAs becoming one of the highly indebted electricity consumers. This group of stakeholders will be affected by the change of metering from postpaid to pre-payment metering.
- e) Small and Micro Enterprises (SMEs) and their employees
- f) Association of Ghana Industries (AGI)
- g) The public

The Project Affected Parties also include vulnerable groups or persons who may be disproportionately impacted or further disadvantaged by the Project activities as compared with any other groups due to their vulnerable status and may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes under the Project. Identifiable vulnerable persons and groups under this Project include:

- h) People living with disability (PwDs)
- i) Lifeline Power Consumers

- j) Women
- k) Aged/elderly
- l) Youth
- m) Widows
- n) People living in remote/ less accessible areas.
People with low or no formal education.

3.1.2 Other Interest Parties

These are institutions, groups, or individuals who may not experience direct impacts from the Project activities, but whose interests may be affected by the Project activities. Interested Parties could also influence the process of the Project's implementation in various ways. These stakeholders include the following:

- a) Ministry of Energy (MoEn)
- b) Energy Commission (EC)
- c) Public Utility Regulatory Commission (PURC)
- d) Environmental Protection Agency (EPA)
- e) Electricity Company of Ghana (ECG)
- f) Northern Electricity Distribution Company (NEDCo)
- g) Meter Suppliers/Vendors/Installers
- h) World Bank (WB)
- i) Metropolitan, Municipal, and District Assemblies (MMDAs)
- j) Ghana National Fire Service (GNFS)
- k) Commission on Human Rights and Administrative Justice (CHRAJ)
- l) Domestic Violence and Victims Support Unit (DOVVSU)
- m) State Interest and Governance Authority (SIGA)
- n) Civil society Organizations (CSOs)/ Non-Governmental Organizations (NGOs) in the energy sector (e.g., African Center for Energy Policy (ACEP))
- o) Media
- p) Law enforcement agencies (e.g., police)
- q) Traditional Authorities
- r) Association of Ghanaian Industries (AGI)

Table 4: Stakeholders Identification and Interest Mapping

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
<p>Ministry of Energy, Ministry of Finance</p>	<p>The Ministry of Energy (MoEn) is the responsible government counterpart and coordinating agency for the preparation and implementation of the proposed project. MoEn will continue to lead efforts to mobilize external resources from Multilateral and Bilateral Development Partners and other potential financiers.</p> <p>The Ministry of Energy is the Government of Ghana ministry responsible for energy policy formulation, implementation, monitoring, and evaluation, as well as supervision and coordination of activities of Energy Sector Agencies.</p> <p>The Ministry will house the PCU that will take charge of the overall supervision and monitoring role of the ESRP.</p> <p>The Ministry of Finance will ensure the appropriation of funds for the implementation of the project. The Ministry of Finance exists to ensure effective economic policy management for the attainment of macroeconomic stability and sustainable economic growth through sound fiscal policy and efficient public financial management, competent staff, and robust systems for the development of Ghana.</p>	<p>Involvement will span the entire project duration.</p>	<p>Engaged</p>
<p>The World Bank</p>	<p>The WB will provide the financing and support to GoG in the preparation and implementation of the proposed project.</p> <p>The WB will expect ECG/NEDCO to meet the bank's requirement for environmental and social sustainability as well as fiduciary arrangements</p>	<p>Involvement will span the entire project duration.</p>	<p>Engaged</p>

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
Local Authority/MMDAs	They are partners in the development and progress of the locality/community as well as ensuring that there is harmonious and peaceful co-existence between and among residents/citizens and development actors in the locality/community	Involvement will span the entire project duration.	Not engaged
PURC	The Public Utility Regulatory Commission PURC was set up as a multi-sectorial regulator by the Government of Ghana in October 1997 under the Public Utilities Regulatory Act, 1997 (Act 538) as part of the utility sector reform process to regulate the provision of utility services in the electricity and water sectors. PURC is an independent body and is not subject to the control of any authority in the performance of its functions. The Office of the President exercises administrative oversight for the Commission. PURC is interested that the customer is not in any way inconvenienced because of the project.	Involvement will span the entire project duration.	
Energy Commission	<p>The Energy Commission (EC) of Ghana is established by Act 541. The act provides for its functions relating to the regulation, management, development, and utilization of energy resources, provides for the granting of licenses for transmission, wholesale supply, distribution and sale of electricity and natural gas, refining, storage, bulk distribution, and sale of petroleum products and to provide for related matters.</p> <p>Energy Commission is interested in whether ECG/NEDCO is meeting the wiring standards and whether the installations and equipment meet the acceptable standards and performance.</p>	During project implementation.	Engaged
EPA	The EPA is the leading public body for protecting and improving the environment in Ghana. The mission of the EPA of Ghana is to co-manage,	Involvement will span the entire project duration.	Engaged

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
	<p>protect, and enhance the country's environment as well as seek common solutions to global environmental problems. According to its mandate, the EPA is Ghana's main agency for environmental governance and management. Core functions include formulating environmental policy; promoting environmentally-conscious planning; coordinating and collaborating with domestic and international agencies/institutions as well as decentralized offices on environmental governance issues; developing standards and guidelines related to pollution including discharge of waste and control of toxic substances; issuing environmental permits and compliance enforcement; conducting investigations and research focused on environmental protection; raising awareness for environmental education; and developing a comprehensive environmental database for public use.</p> <p>The EPA's interest in this project is how environmentally sound waste, which includes electronic and electrical waste that would be potentially generated from the decommissioning of obsolete, non-performing, and other meters to be replaced by the Revenue Protection Project by ECG and NEDCO, would be managed.</p> <p>The EPA also serves as a technical secretariat, interfacing with sectoral agencies. To execute its mandate, the EPA partners with stakeholders from all branches of Government and society.</p>		
Ghana National Fire Service (GNFS)	<p>The Ghana National Fire Service (GNFS) is one of the Agencies under the Ministry of the Interior. The Service was re-established by an Act of Parliament in 1997, Ghana National Fire Service Act, 1997, Act 537. The objective of the Service is to prevent and manage undesired fires.</p> <p>The functions of the Service are:</p>	Involvement will span the entire project duration.	Not engaged

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
	<ul style="list-style-type: none"> a. Organize public fire education programs:- <ul style="list-style-type: none"> i. To create and sustain awareness of the hazards of fire. ii. To heighten the role of the individual in the prevention of fire; and b. Provide technical advice for building plans with regard to machinery and structural layouts to facilitate escape from fire, rescue operations, and fire management; c. Inspect and offer technical advice on fire extinguishers; d. Co-ordinate and advise on the training of personnel in firefighting departments of other institutions in the country; e. Train and organize Fire Volunteer Squads at the community level; f. Offer rescue and evacuation services to those trapped by fire, or in other emergencies; and g. Undertake any other function incidental to the objectives of the Service 		
Commission on Human Rights and Administrative Justice	The Commission of Human Rights and Administrative Justice (CHRAJ) was established in 1993 under the 1992 Constitution of Ghana by Act 456. CHRAJ is the national institution for the protection and promotion of fundamental rights and freedoms and administrative justice in Ghana. CHRAJ exists to enhance the scale of good governance, democracy, integrity, peace, and social development by promoting, protecting, and enforcing fundamental human rights and freedoms administrative justice for all persons in Ghana, and combat corruption.	Involvement will span the entire project duration.	Not engaged
Chiefs Assembly members	Chiefs have been involved in the development of their areas since precolonial times and uphold the social culture of their society. They will	Spanning throughout the life cycle of the project	Not engaged Not engaged

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
	<p>be interested in ensuring that developmental projects are undertaken in their communities and that the ethics and cultural norms are not violated.</p> <p>Likewise, the Assembly members are interested in ensuring that developmental projects are carried out in their communities and also interested in enforcing the bylaws of their MMDA to protect the environment and the people.</p>		
SLT/Non-SLT Customers	<p>Linking of customers to respective transformers and feeders is likely to affect some businesses, livelihoods, and the quality and stability of the power supply during the project implementation.</p> <p>Replacement of obsolete prepaid and postpaid meters may be perceived negatively as ECG/NEDCO trying to manipulate the meter calibrations to their advantage</p>	<p>During project implementation</p> <p>Spanning throughout the life cycle of the project</p>	Not engaged
Local Authorities/ MMDAs	Streetlight tagging and counting may raise security concerns.	Spanning throughout the life cycle of the project	Not engaged
Association of Ghana Industries	Businesses with large Customers are likely to be interrupted by its concomitant effect on profit.	During project implementation	Engaged
Staff	Staff appreciation and buy-in of the importance of the project are very critical to its success	During the Project planning and implementation stage	Not engaged
Regional and District Management in selected regions of ECG and NEDCO	Regional and District Management are the company's interface to customers in the regions and the districts. They have extensive knowledge of the electricity network, the issues, and the behavior of the local	During the planning and project implementation stage	Not engaged

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
	<p>customers. They also receive complaints from customers and know their needs.</p> <p>This group must be informed and consulted to understand the behavior of customers.</p> <p>In addition, their interest lies in the kind of interventions to be implemented in their jurisdiction and comments on the appropriateness of the interventions.</p>		
Communication Directorate	<p>The Communication Directorate is one of the directorates⁶ in ECG and is responsible for the dissemination of information to both staff and the public.</p> <p>Hence, the directorate should be in an informed position on all issues relating to the Revenue Protection Program to communicate it to the public and staff.</p>	During the planning and implementation phase of the project	Not engaged
Network Projects Directorate	<p>Network Projects Directorate implements network construction activities. They supervise to ensure that network construction conforms to ECG's standards.</p>	During the planning, designing, and implementation phase of the project	Not engaged
Operations Directorate and Operations teams in the Regions and districts/Areas.	<p>The Operations Directorate oversees the maintenance and day-to-day operation of the network.</p> <p>They must be informed of network upgrades and improvement activities so that they can update their knowledge of the local network</p>	Spanning throughout the life cycle of the project	Not engaged

⁶ ECG has 17No. directorates and are headed by Directors. Directorate in ECG is the third level of highest level of authority in ECG's operation.

Stakeholder	Stakeholder's Interest	Stakeholder Engagement and Involvement in the Project	Status of Engagement
Engineering Directorate	The Engineering Directorate is responsible for carrying out studies to identify technical losses and inefficiencies in the network. They design new networks and recommend appropriate interventions for network upgrades.	Throughout the entire life cycle of the project.	Not engaged
Media	Project objectives, beneficial communities, and schedule for project implementation	Throughout the entire life cycle of the project.	Not engaged
CSOs, NGOs, etc.	Projects Objectives, benefits, and beneficial communities	During the project design phase	Engaged
PwDs, Single Parents, Power Consumers, People living in remote areas	Projects Objectives, benefits, and beneficial communities	Throughout the entire life cycle of the project.	Not engaged
MoEn, ECG/NEDCo	Projects Objectives, benefits, and beneficial communities	During the project design and implementation phase	Engaged

3.2 Analysis and Prioritization of Stakeholder Groups

3.2.1 Stakeholders Analysis

The Implementing Agencies and the PCU recognize the important roles these identified stakeholder groups play, their interest, the extent to which they could be affected both directly and indirectly, and the fact that the success and sustainability of their operations depend largely on their support, collaboration, and buy-in. To this end, the implementing agencies, and the PIU will prioritize these groups and devise appropriate and acceptable approaches to engage them regularly. It must be emphasized that the level of engagement with these stakeholder groups will vary depending on their level of influence and the extent to which they will be impacted.

To help decide on the engagement approaches that would work with these stakeholders, they will be categorized into the following:

Development Partners: This is the financier of the IPF component of the PforR. The development partner shall provide the needed funds for the various activities under the IPF. The World Bank is the sole financier of these project activities.

Policy Makers and Implementers: These are ministries under the Government of Ghana that are responsible for policy formulation, implementation, monitoring, and evaluation, as well as supervision and coordination of activities of Energy Sector Agencies. These include the following:

- a. Ministry of Energy
- b. Ministry of Finance

Opinion Leaders: These are individual people with expertise or power who exert a significant amount of influence within their network and who can affect the opinions of connected individuals. They have an audience or following that trusts them as a source of information for their interests. This group of stakeholders could include the following:

- a. Chiefs
- b. Assembly members
- c. Celebrities
- d. Subject matter experts

Affected Parties: These are institutions, groups, or individuals who are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project activities, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Stakeholders under this category include:

- a. Special Load Tariff (SLT) consumers of electricity (i.e., consumers above the threshold of 100kVA. These are mostly industries and form the minority of PAPs under this project).
- b. Non-Special Load Tariff (Non-SLT) consumers (i.e., consumers below the threshold of 100kVA. These include residential customers, Lifeline Power Consumers, and Small and Micro Enterprises (SMEs)).
- c. Small and Micro Enterprises (SMEs) and their employees
- d. Association of Ghana Industries (AGI)
- e. The public

Other Interested Parties: These are institutions, groups, or individuals who may not experience direct impacts from the Project activities, but whose interests may be affected by the Project activities. Interested Parties could also influence the process of the Project's implementation in various ways. These stakeholders include the following:

- a. Ministry of Energy (MoEn)
- b. Energy Commission (EC)
- c. Public Utility Regulatory Commission (PURC)
- d. Environmental Protection Agency (EPA)
- e. Electricity Company of Ghana (ECG)
- f. Northern Electricity Distribution Company (NEDCo)
- g. Meter Suppliers/Vendors/Installers
- h. World Bank (WB)
- i. Metropolitan, Municipal, and District Assemblies (MMDAs)
- j. Ghana National Fire Service (GNFS)
- k. Commission on Human Rights and Administrative Justice (CHRAJ)
- l. Domestic Violence and Victims Support Unit (DOVVSU)
- m. State Interest and Governance Authority (SIGA)
- n. Civil society Organizations (CSOs)/ Non-Governmental Organizations (NGOs) in the energy sector (e.g., African Center for Energy Policy (ACEP)
- o. Media
- p. Law enforcement agencies (e.g., police)
- q. Traditional Authorities

Disadvantaged / Vulnerable Groups or Individuals: The Project Affected Parties also include vulnerable groups or persons who may be disproportionately impacted or further disadvantaged by the Project activities as compared with any other groups due to their vulnerable status and may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes under the Project. Identifiable vulnerable persons and groups under this Project include:

- a. People living with disability (PwDs)
- b. Lifeline Power Consumers
- c. Women
- d. Aged/elderly
- e. Youth
- f. Widows
- g. People living in remote/ less accessible areas.
- h. People with low or no formal education.

As presented in Table 4, the stakeholders' analysis indicated that 4No. stakeholders are high-interest and high-influence groups while 5No. stakeholders are low-interest and high-influence groups. On the other hand, there are 4No. high-interest stakeholders, and low-influence, and 2No. Low interest and low influence.

Table 5: Analysis of Key Stakeholders by Influence and Interest

Item	Stakeholder Name	Mandate/Role	Level of Interest	Level of Influence
1	Ministry of Energy, and Ministry of Finance	<p>The Ministry of Energy is the Government of Ghana ministry responsible for energy policy formulation, implementation, monitoring, and evaluation, as well as supervision and coordination of activities of Energy Sector Agencies.</p> <p>Ministry of Finance exists to ensure effective economic policy management for the attainment of macroeconomic stability and sustainable economic growth through sound fiscal policy and efficient public financial management, competent staff, and robust systems for the development of Ghana</p>	High	High
2	The World Bank	The World Bank is the development partner for the PforR/IPF Project. The Bank's key role is providing funds for the PforR/IPF project and ensuring that the relevant Bank's safeguard requirements are adhered to ensuring the sustainability of the project	High	High
3	Local Authorities/MMDAs	These are the local-level governments responsible for the day-to-day administration of the districts. The MMDAs are involved in the approval, implementation, and oversight duties relating to most of the identified environmental and sanitation concerns. They are also the authority to carry out and execute at the local level the provisions of some legislation.	High	Low
4	PURC	PURC was set up as a multi-sectorial regulator by the Government of Ghana in October 1997 under the Public Utilities Regulatory Act, 1997 (Act 538) as part of the utility sector reform process to regulate the provision of utility services in the electricity and water sectors. PURC is an independent body and is not subject to the control of any authority in the performance of its functions. The Office of the President exercises administrative oversight for the Commission.	High	High
5	Energy Commission	The Energy Commission is required by law to regulate and manage the development and utilization of energy resources in Ghana as well as to provide the legal, regulatory, and supervisory framework for all providers of energy in the country, specifically by granting licenses for the transmission, wholesale, supply, distribution, and sale of electricity and natural gas, and related matters. The Commission was set up by an Act of Parliament, the Energy Commission	High	High

Item	Stakeholder Name	Mandate/Role	Level of Interest	Level of Influence
		<p>Act, 1997 (Act 541) with functions relating to the regulation, management, development, and utilization of energy resources in Ghana. The EC's regulatory mandates are:</p> <ul style="list-style-type: none"> • Serving as the Government's energy policy adviser by making national energy policy recommendations to the MoEn. • Formulating national policies for developing and utilizing indigenous energy resources solar, wind, and biomass. • Preparing, reviewing, and updating indicative national plans to ensure that all reasonable demands for energy are met. • Prescribing legislative instruments, standards of performance, and technical and operational rules of practice for supplying, distributing, and selling electricity, • Enforcing legislative instruments uniformly throughout the country. • Promoting competition in the supply, marketing, and sale of renewable energy products and other forms of energy, • Promoting energy efficiency and productive uses of electricity, • Licensing public utilities for transmission, wholesale supply, distribution, and sale of electricity. 		
6	EPA	<p>The EPA is the leading public body for protecting and improving the environment in Ghana. The mission of the EPA of Ghana is to co-manage, protect, and enhance the country's environment as well as seek common solutions to global environmental problems. According to its mandate, the EPA is Ghana's main agency for environmental governance and management. Core functions include formulating environmental policy; promoting environmentally-conscious planning; coordinating and collaborating with domestic and international agencies/institutions as well as decentralized offices on environmental governance issues; developing standards and guidelines related to pollution including discharge of waste and control of toxic substances; issuing environmental permits and compliance enforcement; conducting investigations and research focused on environmental protection; raising awareness for environmental education; and</p>	Low	High

Item	Stakeholder Name	Mandate/Role	Level of Interest	Level of Influence
		developing a comprehensive environmental database for public use. The EPA also serves as a technical secretariat, interfacing with sectoral agencies, and acts as a clearinghouse through several inter-sectoral networks. To execute its mandate, the EPA partners with stakeholders from all branches of Government and society.		
7	Ghana National Fire Service (GNFS)	The Ghana National Fire Service is committed to providing an efficient and valued fire and rescue service to meet statutory requirements in Act 537 and public expectations.	Low	High
8	Association of Ghana Industries	The Association of Ghana Industries (AGI) is a voluntary business association of over 1200 members, made up of small, medium, and large-scale manufacturing and services industries in agro processing (food and beverages), agri-business, pharmaceuticals, electronics and electrical, telecommunications, information technology, utilities, service industries, transport, construction, textiles, garments and leather, banking, and advertising. As the leading voice of manufacturing industries in the country, AGI is dedicated to: <ul style="list-style-type: none"> • Advocating policies that advance the growth and development of industries. • Facilitating international trade through an exhibition of member products in countries across the sub-region. 	High	Low
9	SLT and Non-SLT Customers	Domestic, non-residential, and industrial consumers of electricity	High	Low
10	Visually Impaired, Hearing Impaired, Single Parents, Lifeline Power Consumers, People living in remote areas	This group of electricity power consumers whose social status places them in a disadvantaged position in paying the payment of electricity bills or receiving information relating to electricity consumption reforms.	High	Low
11	Opinion Leaders	In addition to being consumers, this identified group of stakeholders are leaders in the community who wield some form of power that they can use to influence people in the community to either accept or reject the project.	Low	Low
12	Media	The media will be an advocacy partner. Various media platforms and media houses will be used in the dissemination of information and facts about the project to the public.	High	Low

Item	Stakeholder Name	Mandate/Role	Level of Interest	Level of Influence
16	SIGA	<p>The core mandate of SIGA is to promote within the framework of Government policy, the efficient and profitable operations of Statutory Corporations engaged in trade and industry. There</p> <ul style="list-style-type: none"> • Performance Monitoring And Evaluation • Governance, Risk & Compliance • Investment & Divestment • Finance, Fiscal Risk And Debt Management 	High	Low
17	CSOs, NGOs, etc.	<p>NGOs, CSOs, and research institutions play an important role in promoting sound management of electricity, oil, and gas resources and mitigating negative socio-economic, political, and environmental impacts. They facilitate the involvement of grassroots communities and assess and monitor the impact of government policies, and the performances of government agencies, among others. Some of the NGOs and research institutions in the power sector.</p>	High	Low
18	Various Directorates within ECG and NEDCO	<p>These are various directorates and units within The Implementing agencies other than the implementing directorate, whose inputs are required to shape the project.</p>	High	Low
19	CHRAJ, DOVVSU	<p>Per their mandate given by CHRAJ Act, 1993, Act 456, has a duty to promote and protect fundamental human rights and freedoms in Ghana. Under this Mandate, the Commission investigates complaints about how public institutions and their staff carry out their everyday executive and administrative functions. In this project, CHRAJ will be one of the avenues where Gender-based Violence (GBV) grievances will be redressed.</p> <p>Likewise, the Domestic Violence and Victims Support Unit (DOVVSU) of the Ghana Police Service, provides free services in protecting the rights of the vulnerable against all forms of abuse.</p>	Low	Low

3.2.2 Strategies for managing stakeholder groups.

The different strategies to engage the different stakeholder groups based on their position on the influence-interest grid are outlined below. It should be noted that the position of a stakeholder on the grid can be fluid and changes may occur over time.

3.2.2.1 Strategy for maintaining High-Interest and High Influence groups.

This group of stakeholders has both great interest in the IPF Project and the power to influence its success and includes stakeholders whose participation is central to the activity, such as the Ministry of Energy, which hosts the project, the World Bank, PURC, and EC. These stakeholders must be kept close and managed with the utmost care. These stakeholders are likely to be decision-makers and have the biggest impact on the success of the project. They must be kept close to manage their expectations.

3.2.2.2 Strategy for influencing Low Interest and High Influence groups.

These stakeholders need to be kept in the loop with what is happening in the Program and must be ensured that their needs are fulfilled. Even though they may not be interested in the outcome, they wield power. These types of stakeholders should be dealt with cautiously because they could negatively use their power if they become unsatisfied. They must be provided with sufficient information to ensure that they are up to date but not overwhelmed with data. Examples of this type of stakeholders include EPA and GNFS,

3.2.2.3 Strategy for influencing High Interest and Low Influence groups.

Keep these stakeholders adequately informed and talk to them to ensure that no major issues arise. These stakeholders can often be very helpful with the details of the Program. Because of their relatively low influence abilities, they can do little harm to the Program but still are interested in the progress or ultimate result. Typically, just keeping them informed and updated on the Program is sufficient. For example, ensuring they have access to relevant information on the Program's website and then updating the page regularly is enough interaction. Also, the implementing agencies can periodically send out newsletters or press releases to these types of stakeholders. Examples of these stakeholders include AGI, SLT and Non-SLT Customers, Non-Governmental Organizations, MMDAs, Various Directorates within ECG and NEDCO, Media, Civil Society Organizations (CSOs), and Vulnerable Groups.

3.2.2.4 Strategy for Influencing Low-Interest and Low-Influence Groups.

They have little interest and little power to influence the project. However, monitor these stakeholders, but do not spend time and energy on excessive communication. Often, simply periodically monitoring them is sufficient i.e., primarily to ensure that neither their power nor interest levels have materially changed. These stakeholders include opinion leaders, CHRAJ and DOVVSU.

4.0 STAKEHOLDER ENGAGEMENT PROGRAM

Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for the IPF/PforR Program to solicit feedback to inform project design, implementation, monitoring, and evaluation.

This section outlines the strategies that will be used to consult with each of the stakeholder groups. The methods used may vary according to the target audience.

Table 4 is a Stakeholder Engagement program that summarizes the proposed strategies to be used for stakeholder consultation and information disclosure.

4.1 Strategies for Engaging with Stakeholders and Information Disclosure

This section outlines the broader strategic approach that the IPF project implementing agencies shall employ to constructively engage with all identified groups. It is organized according to categories per the stakeholders’ engagement prioritization criteria. Table 4 provides the engagement goals, methods of engagement, information to be shared, and the frequency of engagement.

Table 6: Strategies for Engaging Stakeholders

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
Environmental Protection Agency (EPA) Ghana	Accepted waste management practices must be approved for managing electronic and electrical wastes generated.	Engagement would take the form of formal correspondence, meetings, and site visits. The engagement process will be led by SHE Division/E&S Unit of ECG/NEDCO.	<ul style="list-style-type: none"> iii. Project E&S documents and reports. iv. Information on the type and quantities of electrical and electronic wastes generated from the project and the management procedures used. 	As and when required
PURC, and Energy Commission	Electrical wiring, and electricity service delivery key performance indicators must be met during the project implementation.	Formal correspondence, and periodic reporting on service delivery indicators	<ul style="list-style-type: none"> iv. Technical Summary of the project including Meter Specifications, etc. v. Work Schedules including planned outage schedules. vi. Operations Situational Reports (System Average Interruption Duration Index (SAIDI), Customer Average Interruption Duration Index (CAIDI)) 	<p>As and when required.</p> <p>As and when required.</p> <p>Monthly</p>

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
GNFS	The need to collaborate with GNFS to manage potential risks such as fires emanating from meter tampering and how such fires can be prevented as well as a protocol to notify GNFS on occurrences and locations of fire outbreaks	Face-to-face meetings Through toll-free numbers	v. Non-technical executive summary of project-related fire safety documents and reports. vi. Technical specifications of meters vii. Fire risk of the project iii. Location and type of fire	As and when required.
CHRAJ, DOVVSU	The risk of abuse of the rights of workers of meter suppliers, customers/ electricity users is eminent in the project. There should be an effective Grievance Redress Mechanism (GRM) in place to ensure prompt and fair resolution of grievances/ complaints. To map and integrate these agencies into the GBV/SEA/SH procedures, for purposes of referring relevant GBV/SEA/SH cases to them when they occur.	Face-to-face meetings and official correspondences on issues of Gender Based Violence (GBV)	iv. GBV risks on the projects v. The project's GRM, and referral procedure vi. Unresolved complaints	As and when required
Metropolitan, Municipal, and District Assemblies (MMDAs) Government	Planned outages required for the metering activities can disrupt businesses and by extension reduce the revenue of the MMDA that collects taxes from the local businesses. The MMDAs have jurisdiction over the management of waste. Electronic and electrical waste management practices on the project must be cleared with them.	Engagements can take the form of formal correspondence, meetings, and site visits. The engagement process will be led by SHE Division of ECG/ E&S Unit of NEDCO.	iv. Non-technical executive summary of project documents and reports. v. Work Schedules including planned outage schedules, vi. Type and quantity of waste to be generated from the projects and management practices to be used	Before and after the commencement of works Throughout the project cycle Before the commencement of project works

Stakeholders	Engagement Target/ Goals	Methods of engagement	Information to be shared	Frequency of engagement
CSOs, NGOs, Religious and faith-based organizations, AGI, Media	CSOs, NGOs, and faith-based organizations tend to be advocates for good practices and advocates for the vulnerable and disadvantaged groups in society. Consultation with these groups improves the acceptance of information to share with the public.	Public meetings, media soirees, and focused group discussions. The engagement process will be led by SHE Division / E&S Unit of ECG / NEDCO.	iv. Non-technical executive summary of project documents and reports. v. Technical Reports vi. Outage schedules	As planned by the Regional or District Office.
Customers, Businesses, and the Public	Planned outages can create inconveniences and disrupt business activities. There are instances where food goes bad because of an extended outage. The security of neighborhoods is compromised because of outages.	vi. Electronic and print media announcements. vii. Public address systems mounted on vehicles driving through the affected neighborhood in appropriate local languages. iii. Notices on the website and social media platforms ix. Customer service centers, Faults sections, and offices The engagement process will be led by SHE Division of ECG / E&S Unit of ECG/NEDCO.	v. Non-technical executive summary of project documents and reports vi. Approach to implementation of the e-waste management plan in the ESMF. vii. Work Schedules including planned outage schedules, iii. GRM	Throughout the project cycle
Internal Stakeholders (Directorates and Departments within MoEn, ECG/NEDCO)	Internal stakeholders need to understand the objectives of the project and make meaningful contributions to the design. They also need to understand the Environmental and Social Risks, and the GRM in place for the project	iii. Staff sensitization iv. Memos	iv. Technical summary of the project v. Plans for managing environmental and social risks and impacts of the project. vi. GRM	Throughout the project cycle

4.2 Proposed strategy to incorporate the views of Vulnerable groups.

Views and comments from the disadvantaged and vulnerable groups shall be prioritized. During consultations with these disadvantaged and vulnerable groups, the invitation shall be extended to advocacy groups such as Religious and faith-based groups, CSOs, and NGOs to be present in the consultations and ensure that those views are addressed.

Appropriate media of communication such as Braille, sign languages, and local languages among others shall be employed to enhance the comprehension of the vulnerable groups. The strategy to be used in engaging the vulnerable is summarized in Table 7 below.

Table 7: Strategies for Engaging Vulnerable Groups

Purpose of Engagement	Vulnerable Group	Method of Engagement	Information to be shared	Frequency of Engagement
Solicit stakeholders' input	Visually Challenged	1. A face-to-face meeting with identified groups, radio communication, community broadcast 2. Transcribing text into Braille versions as possible for dissemination of information	Description of project activities, and project objectives	One-time (project planning and designing phase)
	Hearing-impaired	A face-to-face meeting with identified groups using sign language		
	Lifeline consumers	A face-to-face meeting with identified groups, radio communication, community broadcast		
	Slum-dwellers			
	Single Parents			
People living in remote areas				
Project's timelines and requirements from stakeholders	Visually Challenged	A face-to-face meeting with identified groups, radio communication, community broadcast	Timelines/schedule of project and resources required from consumers	One-time (project planning and designing phase)
	Hearing-impaired	A face-to-face meeting with identified groups using sign language		
	Lifeline consumers	Face-to-face meetings with identified groups, radio communication, community broadcast		
	Slum-dwellers			
	Single Parents			
People living in remote areas				
Information on environmental	Visually Challenged	Face-to-face meetings with identified groups, radio communication, community broadcast	Environmental and social risks of the	

and social risks and mitigations	Hearing-impaired	A face-to-face meeting with identified groups using sign language	project and updated risk register	Continuous (monthly)
	Lifeline consumers	A face-to-face meeting with identified groups, radio communication, community broadcast		
	Slum-dwellers			
	Single Parents			
	People living in remote areas			
Grievance's mechanism	Visually Challenged	A face-to-face meeting with identified groups, radio communication, community broadcast	Grievance Mechanism	Continuous (monthly)
	Hearing-impaired	A face-to-face meeting with identified groups using sign language		
	Lifeline consumers	Face-to-face meetings with identified groups, radio communication, community broadcast		
	Slum-dwellers			
	Single Parents			
	People living in remote areas			

4.3 Review of Comments

Views and comments from stakeholders during the consultation process shall be written. Written comments shall be received and filed. A stakeholder Engagement Review team as described in the stakeholder engagement program shall review all comments, either oral or written, and ensure that the comments are addressed and communicated to the stakeholders.

5.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Introduction

The PCU and the Implementing Agencies appreciate and recognize the value of a well-developed and fully executed stakeholder engagement plan for the IPF activities. It also recognizes that the sustainability of the IPF components operations and outcomes depends to a large extent on how well this SEP is implemented. The implementation of the SEP will be integrated into the implementation of the different components of the project to ensure that stakeholders are engaged in all phases of the project.

The section outlines the institutional arrangement, roles, responsibilities, and resources required for stakeholder engagement and the implementation of the SEP.

5.2 Phases of Stakeholder Engagement

5.2.1 Planning Phase

- a. In the planning phase, decisions are being made about the project's objectives and outcomes, specifications of meters to be used, what meters are to be replaced, and where to deploy the meters.
- b. The PCU and the Implementing Agencies will engage and consult with key stakeholders including the development partners, regulators, Advocacy groups, and electricity consumers.
- c. The consultation will be used as an effective tool for arriving at an agreement with project-affected stakeholders on measures they will find acceptable as well as in the design of benefits that are targeted and culturally appropriate.

5.2.2 Project Design Phase

- a. The design phase of the project life cycle offers the best opportunity for effective consultation and active participation of all relevant stakeholders to ensure the outcome of the design reflects what both the implementing agencies and its stakeholders want for the particular activity. This is usually where the opportunity to share project designs, and their identified impacts and have mitigation measures inculcated into the design. It is at this stage that concerns stakeholders including the vulnerable (single parents mostly women, the physically challenged, the visually challenged, men, boys and girls, disabled persons, people living with HIV/AIDS (PLWA), and issues of involuntary resettlement can be avoided through design consideration.
- b. The Ghana EIA procedures during this phase require stakeholder engagement with all interested parties through EIA scoping, public meetings, and public participation when the

project has significant adverse environmental and social impacts. The engagement in the scoping phase is to help the consultant scope the extent of the EIA study. The EIA study phase consultation shall be with project design engineers, custodians of relevant information, and potentially affected persons. When a Draft Environmental and Social Impact Statement (ESIS) has been submitted to EPA, a public forum shall be held.

- c. To make the engagement meaningful, the staff leading the engagement will make the following information available to stakeholders in a form and substance appropriate and acceptable to project-affected stakeholders during consultation and engagement to help them make meaningful input:
 - i. An overall description of the project and its main objectives, including specific locations and the timetable of the main events: construction phase, peak operational activity, decommissioning;
 - ii. A more detailed description of the project as it relates to topics for consultation or wider stakeholder engagement; and
 - iii. An outline of the environmental and social impacts to be assessed during the consultation, and any provisional conclusions or predictions already reached including proposals for mitigation measures.
- d. The project delivery team shall document the process and results of the consultation by keeping track of the ‘who’, ‘what’, ‘when’, and ‘where’ of the consultation. This is key to ensuring effective implementation of the process. Commitments made by parties during the consultation shall also be recorded. Keeping documentation of the consultation process will help the company demonstrate to stakeholders that their views have been incorporated into project strategies and are useful resources for reporting back to stakeholders on how their concerns have been addressed.
- e. Engagement at this phase will be led by the SHE Division, and supported by the Customer Service Directorate, Premises and Estates Directorate, and the Legal Services Directorate of ECG/NEDCO.
- f. Issues of concern and interest to women, elderly, youth, and disadvantaged or vulnerable members of families will be prioritized, addressed, and communicated appropriately to them in either language or medium they will understand. Input from the identified stakeholders will be considered in arriving at a compensation level acceptable to all.

5.2.3 Construction/Installation Phase

- a. Engagement during the installation of the meters is essentially about involving stakeholders in assessing whether measures are working as intended, whether the Implementing

agency/the PCU is being responsive to grievances, and identifying alternatives where there are failings. In addition, engagement will include providing timely information about when work will commence, the appropriate length of time required for the activity, and explanations for delays.

- b. Concerns and issues of risks to women and vulnerable groups will be given high priority. The implementing agency/the PCU shall continue to engage with PAPs in the project area, particularly. They need to be given information about the following:
 - i. Notification of installation timelines and any potential changes to the schedule
 - ii. The purpose and nature of the installation activities
 - iii. Schedule of installation activities
- c. Avenues that may be used to communicate with the public may include, the MoEn/Implementing Agencies' Social Media platforms, door-to-door leaflets distribution, print, and electronic media, etc.

5.3 Roles and Responsibilities of Management and Key Actors in Stakeholder Engagement Planning and Implementation

Table 8: Roles and Responsibilities of Management and Key Actors

Unit/Position	Roles and Responsibilities
MoEn PCU	<ul style="list-style-type: none"> a. Supervision, and monitoring of activities in the SEP. b. Facilitate access to the MDAs for stakeholder consultation and engagement.
ESRP Working Group Board	Oversight responsibility and support for the implementation of the SEP for the ESRP
Managing Director of ECG/NEDCo	<ul style="list-style-type: none"> a. Ultimate responsibility and authority for ensuring good implementation of this SEP. b. Authority for approving resources for SEP implementation.
Deputy Managing Directors of ECG/NEDCo	Authority for approving resources for SEP implementation at an approved threshold.
Finance Directorates of MoEn/ECG/NEDCo (Implementing agency)	Review the budget and allocate resources for SEP implementation.
Customer Services Directorates of ECG/NEDCo	Ensures that comments and suggestions raised at public forums are addressed in the final design of the project.
Communication Unit	<ul style="list-style-type: none"> a. Ensures that the social media sites are regularly updated, and satisfactory responses are given to queries. b. Ensures that service centers run properly. c. Ensures that public education continues throughout the company's operational areas.
Safety Health and Environment Department (ECG/NEDCo)	a. Ensures that adequate consultation has been done as part of the ESIA process through their review of documents submitted.

Unit/Position	Roles and Responsibilities
	<ul style="list-style-type: none"> b. Collaborates with the PIU in organizing public participation events as part of the ESIA process if required. c. Ensures the Permit conditions are complied with
Environmental and Social Specialists (ECG/NEDCo)	<ul style="list-style-type: none"> a. Lead in stakeholder consultation. b. Ensure compliance with the Stakeholder Engagement Plan. c. Monitor the implementation of the Stakeholder Engagement plan. d. Review stakeholder engagement processes. e. Give recommendations to management on a policy and process review. f. Ensure that all vulnerable persons affected by the IPF/PforR project have their concerns heard and addressed.

5.4 Budget

The budget for the implementation of the Stakeholder Engagement Plan is presented in Table 8 below. Funding for the budget shall be drawn from the IPF's budget for the implementation of the IPF/PforR.

Table 9: Budget for Stakeholder Engagement Processes and GM Implementation

ITEM	ACTIVITY	PURPOSE	COST (\$)	COMMUNITIES
A	Community Durbars/Community sensitization meetings	Sensitization of stakeholders on the Implementation of metering activities	5,000	Two (2) communities in each ECG operational region
	Engagement with key stakeholders (MMDCEs, Assembly members, Opinion Leaders, etc.		2,700	
	Radio announcement and Sensitization/Educational program		32,000	
	Use of Community Radio/ Communication System		11,000	
Sub-total A			50,700	
B	Community Durbars/Community sensitization meetings	Sensitization of stakeholders of the	10,000	Two (2) communities in each region/ NEDCO Operational Areas
	Engagement with key stakeholders (MMDCEs, Assembly members, Opinion Leaders, etc.	Installation of Prepayment Meters to all 11,200 Non-SLT	4,000	
	Radio announcement and Sensitization/Educational program	Non-Strategic MDAs, replacement of Obsolete	40,000	
	Community Radio/ Communication System	Prepayment and Postpaid Meters	20,000	
Sub-total B			74,000	
C	Sensitization of the GM procedures, setting up of GRCs and GRC functions.	Operationalization of the GM	20,000	Across all ECG IPF operational areas.
Sub-total C			20,000	

D	GRAND TOTAL (A+B+C)	144,700
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6.0 GRIEVANCE MECHANISM

The Grievance Mechanism (GM) is a fundamental requirement of the Stakeholder Engagement Plan prescribed by the ESS 10. The overall objective of the GM is to provide an effective, transparent, and timely system that shall give aggrieved person redress and avoid litigation, minimize bad publicity, avoid/minimize delays in the execution of infrastructural works, and ensure public health, safety, and sustainability of the company's operations. The GM provides all persons and groups affected by the company's projects and activities, with avenues through which they can express their concerns and receive the needed corrective action in an appropriate and timely manner.

This section shows the different categories of complaints where and how a complainant lodges their complaint, how the company responds, and how the response is communicated.

At public engagements targeted at projects, attendants shall be informed of the grievance mechanism and encouraged to use it. To ensure that all understand what is being communicated, these engagements shall be conducted in languages common to the project footprint. This will however be in addition to the regular processes for publicizing our avenues for receiving complaints.

6.1 Complaints relating to Power Surges

A customer requiring power connection to their premises is expected to indicate in their application their intended load. Whenever their load increases beyond what they initially asked for, they must inform ECG/NEDCO of this increase.

- a. ECG/NEDCO receives a complaint that claims damage to equipment, fire, or electrocution.
- b. ECG/NEDCO shall investigate from their records if such a surge occurred in the specific area and at what time. This is possible because records are kept of episodes on their network.
- c. ECG/NEDCO shall also investigate if other properties experienced the same surge.
- d. For fires, ECG/NEDCO usually receives a report from the Ghana National Fire Service
- e. If ECG/NEDCO is found liable for the damage or fire, the issue is referred to the Legal Directorate for determination of reinstatement due.

6.2 Complaints relating to Prolonged Power Outages/ Delayed Replacement of removed Meter.

Per the installation standards of ECG/NEDCO, meter installations must be done on a de-energized network or service connection. Prior to the removal and replacement of meters, technicians should cause local outages for the customer. Such outages must be planned and well-coordinated to prevent rampant outages within a working area and should be within the approved minimum time. For an outage to be caused, the PURC regulation requires the utility company to notify them not

later than 72 hours before the outage. A customer may call to complain of an unexplained outage, prolonged outage, or a removed meter that has not been replaced within the stipulated time.

- a. ECG/NEDCO receives a complaint.
- b. ECG/NEDCO conducts an investigation.

For complaints relating to meters, the utility company (ECG/NEDCO) is required under the L.I. 1935 to visit the site within 24 hours after receipt of the complaint from the customer.

6.3 Billing Complaints

- a. Complaints about bills are received by the District/Area Commercial Officer or the District/Area Technical Officer (sometimes through the call center)
- b. They receive the bill and take down critical information contained in the bill.
- c. Investigations are carried out.
- d. Overbilling is rectified.
- e. Further investigations may be carried out on the meter.
- f. A faulty meter will be changed – prepaid meters are changed quickly because without them a customer cannot have power.
- g. When the problem is the customer’s main switch, they are asked to call for the services of an electrician.
- h. When it is discovered that the problem is a result of a tempered meter, the customer is made to pay for the power that was used without payment and in addition is made to pay a penalty.
- i. To deter others from stealing power, customers who steal power are sent to court.
- j. Customers who make it impossible for scheduled staff to enter their premises to read their meters are disconnected from the pole.

6.4 Complaints Related to Abuse and Harassment, Gender-Based Violence, Sexual Exploitation

All ECG/NEDCo employees, contractors, sub-contractors, community member(s), and customers should be made aware of the project’s policies on Abuse and Harassment, Gender-Based Violence, and Sexual Exploitation. ECG/ NEDCO’s employees, contractors, and sub-contractors who would be involved in the meter installation or supervision of the meter installation would be required to sign a GBV/SEA/SH Code of Conduct before the commencement of project works. This requirement for contractors and sub-contractors will be included in ECG’s bidding documents for the works.

6.5 Channels of Complaints

The project shall make available options for grievance which will include Call Center, District/Area Offices, Projects Site Offices, local community organizations, local health care

providers, and community complaints boxes. Call Center numbers shall be made available during stakeholder consultations and be posted in the community complaints box. Additionally, other local existing channels deemed trusted and fit for purpose may be explored and adopted.

a. Grievances relating to ECG should be reported through:

- Call Center via 0302611611
- District Offices
- Electronic mail via help@ecggh.com
- Community Complaints Box

b. Grievances relating to NEDCO should be reported through:

- Call Center via (see Annex 3) for the NEDCO catchment area.
- Area Offices in Each NEDCO Operational Area
- Electronic mail via help@ecggh.com
- Community Complaints Box
- WhatsApp on 0244948037

c. Grievances relating to MoEn should be reported through:

- Call Center via 0302904468/+233 276502239.
- info@energymin.gov.gh
- P. O. Box SD40, Stadium Post Office Accra
- Second Floor Room 206
- Ministry of Energy behind National Theatre (Opposite Pension House (SSNIT) & Ministry of Environment Science Technology and Innovation) and adjacent to the Environmental Protection Agency (EPA).

The PURC and The African Center for Energy Policy (ACEP) provide various platforms where electricity-related complaints can be made. These channels are listed below.

d. Grievance through ACEP Electricity Monitor online platform:

The platform serves as a tool for the public to monitor and access information on the status of the power sector, make complaints, and provide general feedback on electricity situations in their communities. This can be made through the online address below:

- <https://electricitymonitorgh.com/>

e. Grievance through the Public Utility Regulatory Commission (PURC):

- Walk into the Regional Offices of PURC and the various regional capitals for verbal or written complaints. Or
- Visit the online resource <https://www.purc.com.gh/#complaint> to lodge a complaint.

f. Grievances through the Local Energy Group

Complaints on the LPGPP or other general issues concerning the IPF/PforR can be reported by:

- Walk into the Town Council Office the chief's palace or any designated place agreed by the Energy Group for a verbal or written complaint. Or
- Post written complaints to the Community Box that will be located at vantage points in the communities.

6.6 Complaints Received through a Call Center

The call center's toll-free number shall be made available to all stakeholders during the stakeholder consultation and made available at vantage points such as at offices of the MMDAs. The following steps would be triggered upon receipt of a complaint via the call center:

- a. A problem communicated to the call center is logged.
- b. The logged complaints are passed on to the project manager.
- c. The available project team and the Environmental Specialist (if required) shall investigate and rectify the problem.
- d. Feedback is given to the call center.
- e. The call center sends a prompt (SMS) to inform the customer that the fault has been rectified.

6.7 Complaints Received through ECG District or NEDCO Area Office

- a. Should a complaint be made at any of the company's offices, the complaint will be logged.
- b. The name, phone number, and address will be included in the record.
- c. Information will be passed on to the project manager.
- d. The project team and the Environmental Specialist (if required) shall investigate and rectify the problem.
- e. After the complaint has been rectified, it shall be reported back to the Customer Relations Officer.

6.8 Procedures for Redress of Grievances

The Grievance Mechanism for the various issues relating to the IPF project is presented in Figures 2, 3, and 4. The procedure for grievance redress is outlined below.

6.8.1 Submission of Complaints

A complainant should be:

- a. An employee, contractor, sub-contractor, community member(s), or customer who is adversely or potentially affected by the IPF/PforR. Anonymous submission will also be

accommodated when it is needed to protect the safety of the complainant and resolution will not be affected.

- b. Third parties, such as interest-based NGOs or other stakeholder think tanks, outside of the project implementation communities, could lodge formal complaints on behalf of the community. However, such third parties will be required to declare if there are any conflict-of-interest issues. Where the implementing agency does not address a complaint satisfactorily, the complainant can submit it directly to the PURC forward the complaint to a higher authority, or proceed to the courts, under the laws of Ghana.

The complainant(s) should provide the following information:

- a. The identity: name(s), gender, address(es) and contact information. Proper identification of the complainant prevents malicious or abusive use of the Mechanism. It also enables the establishment of a channel of communication in case further information is necessary for the proper processing of the complaint. The GM should guarantee strict confidentiality of complainants' identities. If the party submitting the complaint is doing so on behalf of an affected person or community, it must identify on whose behalf the complaint is made. The complainant must also present evidence that it has been requested to present the complaint on behalf of the project-affected people/person. However, if necessary, the complainants should be kept anonymous if he/she wishes to remain so.
- b. Date of the incident or action giving rise to the complaint (if applicable).
- c. Description of the concern and any supporting documentation.
- d. Specific remedy sought (if applicable).
- e. Any other information as deemed appropriate by the complainant.

The receiving jurisdiction of the implementing agency should record and document the complaint. See Annex 1 for a sample of the GM complaint form and Annex 2 for a sample of the Grievance Register.

All staff including those who intern with the Company and third-party contractors are all covered by Insurance.

6.8.2 Notification of Receipt

Within two business days of receipt of the complaint, the implementing agency shall notify the complainant(s) of receipt of the complaint. After acknowledging receipt, the implementing agency has the option to request additional information from the complainant(s) at the time of notification.

6.8.3 Screening for admissibility and preliminary assessment

Within five business days of receipt of all requested information about a complaint (if the request for further information was made in the notification of receipt) or of the complaint (if no further

information was requested), the implementing agency will assess the complaint to determine its eligibility and develop a thorough understanding of the issues and concerns raised in the complaint. A complaint shall be deemed eligible if:

- a. The complainant is identifiable and has provided a name and contact details (in case of non-anonymous inquiries and grievances).
- b. The alleged adverse effect(s) falls within at least one of the two categories of the scope of the GRM. The complainant can submit queries, comments, suggestions, or complaints.
- c. The complainant is affected by an activity or an associated activity of the PforR financed project. An activity is deemed associated if:
 - i. It is directly and significantly related to the activities funded by the WB; and
 - ii. Carried out, or planned to be carried out, contemporaneously with the WB-funded activities and necessary for the financed activities to be viable.
- d. The complainant(s) should indicate how the IPF/PforR has caused a negative economic, social, or environmental impact on the complainant(s), or has the potential to cause such an impact. The complainant(s) should specify the kind of impact which has occurred or may occur.
- e. The complaint is submitted in good faith and is aligned with the primary purpose of the GM.

Once the screening has been completed, the receiving entity should categorize the complaint (see Table 7) and provide feedback to the complainant on the next actions to be undertaken. The receiving entity should also make recommendations and decide on the most suitable actions such as further investigation, complaint resolution, or compliance review.

6.8.3.1 Investigating Abuse and Harassment, Gender-Based Violence, Sexual Exploitation Complaints.

All complaints should be investigated and dealt with promptly.

- a. Investigations and allegations must be in writing and signed by the complainant(s). Trade unions or workers' representatives should also be able to submit complaints on behalf of one or more workers.
- b. The alleged harasser should receive a copy of the allegations and be allowed to respond before the investigation begins.
- c. A thorough investigation should:
 - i. Include interviews with complainants, their witnesses, alleged harassers, and their witnesses.
 - ii. It is good practice that interviewees be accompanied by a trusted colleague or trade union representative.

- iii. Examine all relevant documents, records, and personnel files if necessary;
- iv. Provide a written summary of the full investigation to the complainant and the alleged harasser;
- d. Both parties should be allowed to provide comments on the content of this summary before the full report is finalized;
- e. If the report is drafted by an independent investigator, the full report should be submitted to the person and/or department responsible for handling sexual.
- f. harassment complaints. This report should include who was interviewed, what questions were asked, the investigator's conclusions, and what possible remedies, sanctions, or other actions may be appropriate.
- g. Support from outside the company may be used if the complainant is not satisfied with the outcome of internal processes or has grounds to lack confidence in them.
- h. Committees handling sexual harassment cases should include an equal representation of men and women to ensure that the perspectives of both women and men are taken into consideration.
- i. They also need to include representatives of both management and workers. Victims should be represented or accompanied by a representative of them.

6.8.4 Notification of Action

Within 10 business days from receipt of the complaint or all further information requested, the implementing agency shall notify the complainant(s) of the decision to process the complaint if it determines the complaint is eligible or rejected if ineligible.

When the implementing agency rejects the complaint due to ineligibility, the complainant should be informed of the decision and the reasons for the rejection. The Grievance Redress Office of the implementing would engage the complainant before a decision to reject a complaint is made and formally communicated.

If the complainant(s) is not satisfied with the resolution or the lack thereof (in the case of ineligibility), the complainant can forward the complaint to a higher authority (PURC) or proceed to the courts, under the laws of Ghana.

If a complaint is deemed eligible and accepted for resolution, the implementing agency may, depending on the circumstances and the complexity of the situation, investigate the complaint further. The complainant should be informed of the decision to investigate. Procedures carried out during an investigation may include, but are not limited to:

- a. Reviewing documentation filed by the complainant.
- b. Meeting with the complainant.
- c. Meeting other stakeholders (e.g., EPA, Energy Commission).

- d. Consulting scientific literature and publications relevant to the issues of harm raised in the complaint.

6.8.5 Complaint Resolution

If the complaint is about the IPF/PforR, then the implementing agency will engage the complainant and other relevant stakeholders to find mutually satisfactory outcomes. If the parties agree to seek a joint resolution to the issues, a mutually agreed process will be designed and implemented.

6.8.5.1 Handling Abuse and Harassment, Gender-Based Violence, Sexual Exploitation Complaints.

Formal complaints are usually managed by the human resources department, or an individual specifically appointed by the employer. If the complaint is against this department or a specific individual working in this department, an independent external person should manage it.

- a. All complaints and investigations should be treated confidentially, and the disclosure of information shall be based on a need-to-know basis.
- b. The identity of the complainant should be made known to only the parties involved during the investigation.
- c. The complainant should be protected from retaliation during and after the investigation.
- d. All information about a sexual harassment complaint or investigation should be maintained in secure files.
- e. Survivors of SEA/SH may require access to health, psychosocial, police, justice, safe shelter, and livelihood services to begin healing from the experience they complained about.

In the situation where the complainant is not satisfied with the outcome of grievance redress, then the option of using the national GBV Service Providers (GBV SPs) will be made available. Such service providers in the Greater Accra Region can be looked up via the link <https://garid-accra.com/gender-based-violence/>. This internet resource is a spatial web-based map indicating the locations of the service providers in all 29 MMDAs in the Greater Accra Region. These service providers include CHRAG, Judicial Services (Circuits, Magistrate, and the High Courts), Legal Aid, and DOVVSU. The services of the listed providers, in jurisdictions outside Greater Accra Regions, shall be explored when such needs arise.

6.8.5.2 Dispute Resolution Relating to Electricity Supply and Utilisation.

The PURC is mandated by law i.e., the PURC Legislation L.I. 2413 to mediate or arbitrate disputes relating to electricity supply and use. In the Electricity Supply and Distribution (Technical and Operational) Rules 2005, L.I. 1816, Rule 33 sets out the modality for complaints and dispute resolution.

In situations where a customer is not satisfied with the outcome of the utility supplier's response to complaints, the customer can resort to PURC for mediation or arbitration. Likewise, the utility company can also resort to PURC for dispute resolution. The procedure to follow is as follows:

- a. Under this circumstance, the consumer or the public utility may lodge the complaints with PURC. The complaints may be made orally or written.
- b. The complaints should be supported with copies of relevant documentation.
- c. The complainant should disclose information relevant to the complaint such as:
 - i. Full name, telephone number, and address including electronic mail address and digital address.
 - ii. Full name and address of the respondent.
 - iii. Particulars of the nature of the complaint and the relief sought by the complainant and.
 - iv. The nature and harm suffered by the complainant because of the action, inaction, or omission of the respondent.
- d. The Commission shall, within five working days from the date of receipt of the complaint, serve a copy of the complaint on the respondent.
- e. The Respondent shall, within five working days from the date of receipt of the complaint or at a later date determined by the Commission, submit a written response in respect of the complaint to the Commission.
- f. The Public Utility shall, within five working days of resolution of a complaint submit a written notification of the resolution to the Commission, indicating the terms of the resolution in the form prescribed by the Commission.
- g. The Commission shall, on receipt of the complaint, conduct a preliminary investigation into the complaint.

The Commission may at any time during or after the conduct of a preliminary investigation, invite the parties to a complaint and conduct a mediation of the complaint in accordance with the Mediation Guidelines of the Commission.

Where the parties to a complaint fail to resolve the issues through mediation or the Commission is of the opinion that having regard to the nature of the issues in dispute, the complaint cannot be resolved by mediation, the Commission may conduct a formal hearing of the complaint in accordance with the Formal Hearing Guidelines of the Commission.

A complainant may withdraw a complaint lodged with the Commission, but the withdrawal does not limit the right of that complainant to lodge the complaint again.

Other avenues such as the Magistrate Courts and CHRAJ could be used as alternatives to ADR.

6.8.5.3 Restoration of Power

ECG/NEDCO, under the LI 1935 must restore power supply to the customer within the listed stipulated times for outages caused by minor faults other than natural disasters:

- a. Eight hours for a metropolitan or municipal area or industrial estate
- b. Twelve hours in the case of a district capital
- c. Twenty-four hours in the case of rural areas

6.8.5.4 Replacement of Meter

Under the L. I. 1935, The utility company (ECG/NEDCO) after establishing a defect in a customer's meter is required to replace the defective meter within 48 hours. L. I. 1816 further instructs the utility provider to provide an appropriate alternative supply to the customer when a meter is found to be defective.

6.8.6 Formulation of Response

Within 20 business days of receipt of an eligible complaint, the implementing agency shall respond to the complainant, which should include a proposal to address the complaint and an action plan with a timeframe for its implementation. The implementing agency shall engage with the complainant and request formal feedback on the proposal.

Once there is a mutually agreed proposal, the implementing agency shall formulate a response to address the issues raised in the complaint. Throughout this process, the implementing agency shall maintain dialogue with the complainant(s).

If the proposal is accepted by the complainant(s), the implementing agency shall implement it according to the process and timeframe outlined in the proposal. The implementing agency and the complainant(s) will agree on the proposal within five (5) business days after the initial proposal has been presented to the complainant(s).

However, if the proposal is rejected by the complainant(s) and/or the complaint cannot be resolved through the process outlined in the GM, the implementing agency shall inform the complainant(s) that no resolution can be reached and close the complaint.

6.8.7 Implementation and monitoring of corrective actions

Once a proposal is accepted by the complainant(s), the implementing agency shall promptly start implementing it. The proposed timeframe will depend on the nature of the actions. The implementing agency shall inform the complainant(s) in advance and explain the scope of the action plan and the timeframe. The PCU shall monitor to ensure that all corrective actions are implemented.

If the complainant(s) believe that the actions have not been satisfactorily implemented, the implementing agency will engage the complainant(s) to determine how to achieve a satisfactory outcome. If such additional engagement does not lead to an agreement, the complaint will be

closed. If the complainant(s) is not satisfied with the results, such a person can approach PURC or the courts, under the laws of Ghana.

6.8.8 Closing of Grievance

ECG/NEDCo should consider a grievance closed only if an amicable resolution has been reached and satisfactorily implemented. However, the implementing agency may close a grievance under special circumstances, if several attempts to find an amicable resolution fail. If the complainant(s) is not satisfied with the decision, the complainant can approach PURC or the courts, under the laws of Ghana.

6.8.9 Reporting and transparency

At the completion of the procedures, an internal report on each grievance, including recommendations should be prepared and documented. Recommendations may be operational corrective actions or improvements to existing policies or procedures. Where possible and appropriate, a corrective action plan should be developed and implemented.

The implementing agency shall present a report to PURC on the completion of the agreed action and closure of the grievance.

6.8.10 Recordkeeping

The register of all complaints lodged into the implementing agency’s Grievance Mechanism as well as all information collected during the IPF/PforRs shall be duly filed and archived ensuring restricted access and, where possible, deploying a chain of custody measures. The Implementing agency shall keep records of lessons learnt while processing the complaints. Table 9 below summarizes the timeline for responding to and addressing grievances.

Table 10: Timelines for Responding to Grievances

Activity	Timeline
Notification of receipt	Within two business days of receipt of the complaint
Screening for admissibility and preliminary assessment	Within five business days of receipt of a complaint
Notification of action	Within 10 business days from receipt of the complaint
Formulation of response	Within 20 business days of receipt of the complaint

Figure 1: General Grievance Mechanisms Relating to Electricity Complaints

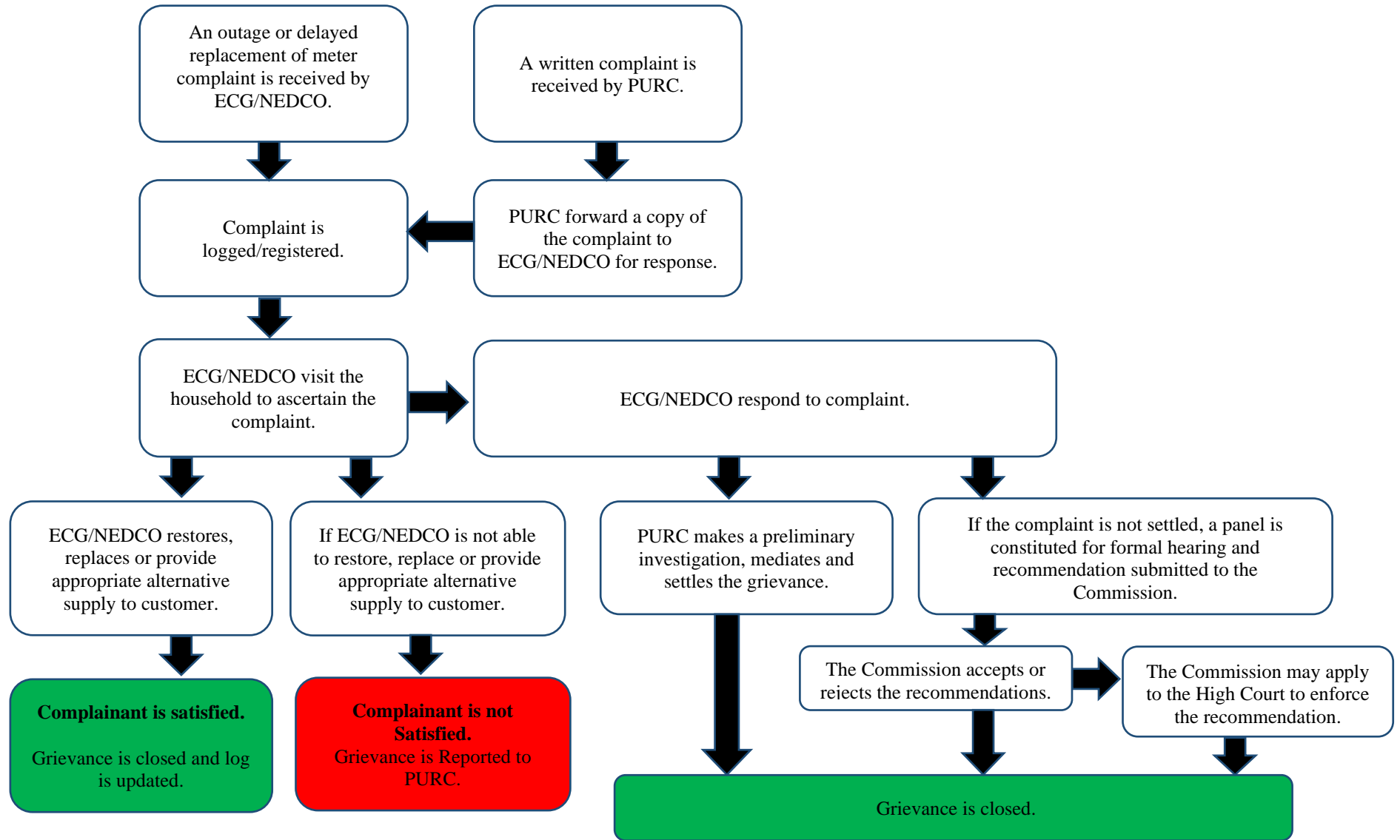


Figure 2: Complaints Related to Damage to Equipment, Fires, and Electrocutation

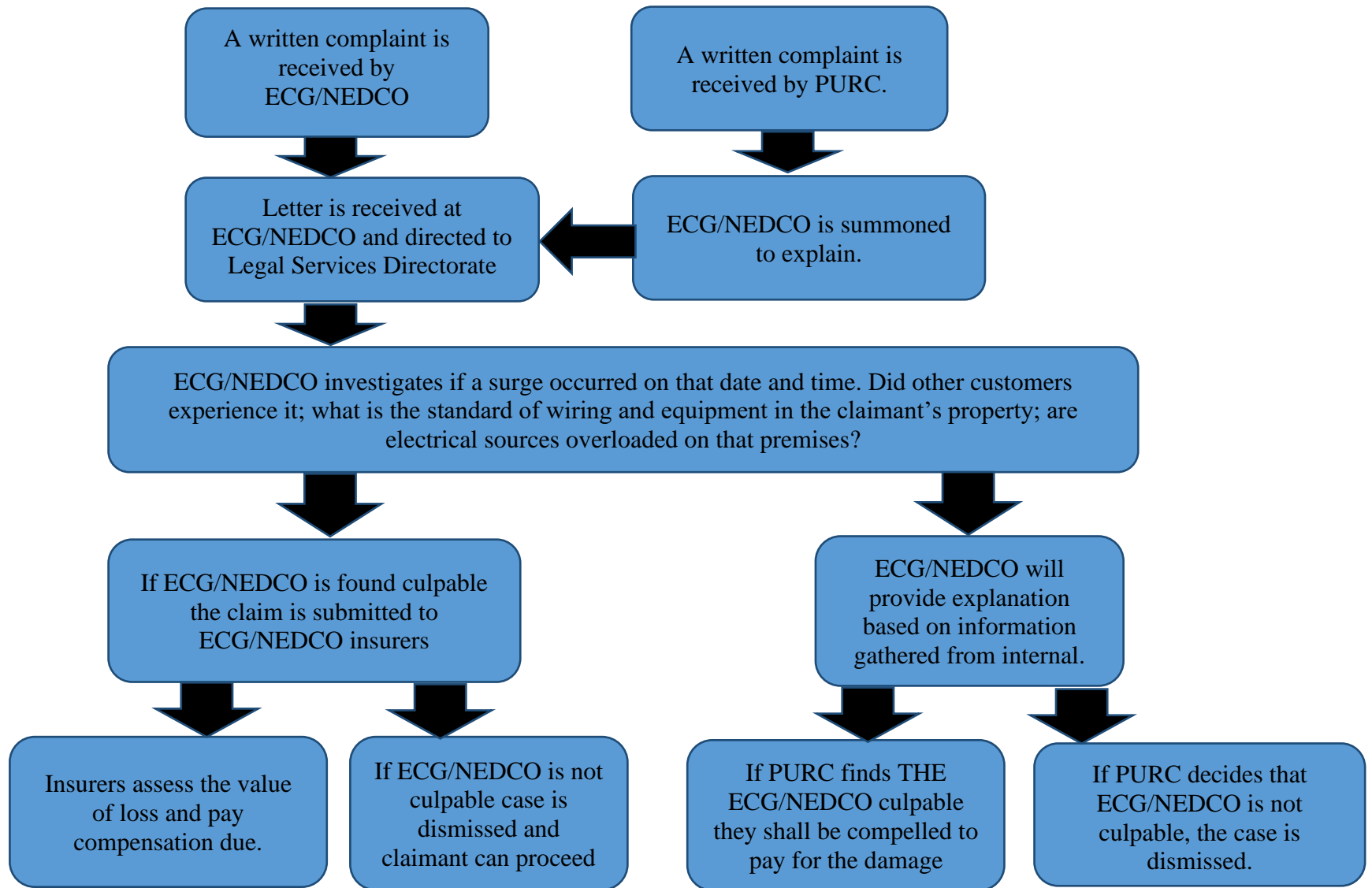
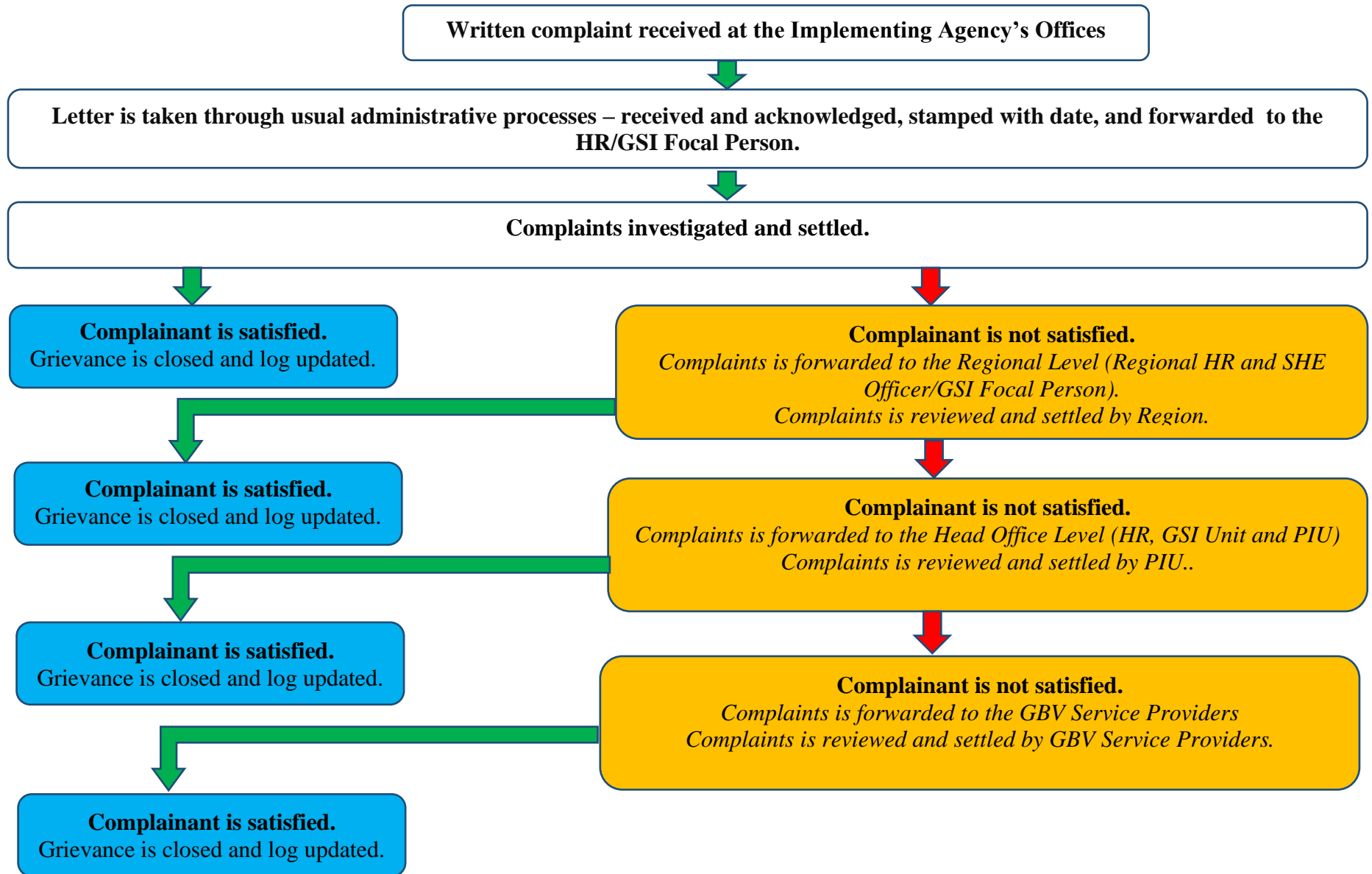


Figure 3: Grievance Mechanisms Related to GBV and Other General Issues



7.0 MONITORING AND REPORTING TO STAKEHOLDERS

7.1 Project Monitoring

The project monitoring team will ensure that all monitoring visits are collaboratively done with the stakeholders. Feedback will be sought in an open forum that will be organized at the end of every monitoring visit. This will ensure that people’s apprehensions are openly expressed and addressed. Monitoring visits will be organized quarterly; however, in situations where the project receives a complaint either formally via the GM’s complaint form or informally through a project staff, where the complaint is of such a magnitude that it could negatively impact implementation, the IPF project team will initiate a joint monitoring visit to the project site.

7.1.1 SEP Monitoring Indicators

Table 10 outlines specific SEP indicators relating to E&S assessments, stakeholder engagement, personnel, Environmental and Social Management Systems, Grievance Mechanisms, and Monitoring and Communication. The Implementing Agency will track these indicators and report them to the PUC of MoEn, who will then report them to the WB. The Environment and Social or GSI Department of the Implementing Agency will be responsible for tracking and reporting the SEP indicators.

Table 11: Monitoring Indicators

GOALS	INDICATORS
Stakeholder Engagements	<ul style="list-style-type: none"> The Number of stakeholders consulted is disaggregated by the type of stakeholder. The Number of Stakeholder workshops or meetings organized. The Number of press materials published/broadcasted in the local, regional, and national media relating to stakeholder engagements. The Number of participants attending stakeholder consultations disaggregated by sex and stakeholder group. The proportion of stakeholder groups identified in the SEP who have been engaged by the project team. The Number of stakeholder engagement feedback assessments/evaluations carried out. The proportion of stakeholder concerns addressed and communicated to them
Grievance Mechanism	<ul style="list-style-type: none"> Development and operationalization of a Grievance Mechanism, The Number of complaints received in a specific period. The Number of complaints resolved. The Number of complaints pending The number of complaints referred to PURC, EPA, and Energy Commission The number of complaints submitted by age, gender of the complainant
Monitoring & Communication	<ul style="list-style-type: none"> Development and approval of an M&E policy. The number of unique communication tools developed (Newsletters [electronic], Websites, Social Media Platforms, Flyers, Brochures, etc.). The number of communication tools shared per type of communication tool, disaggregated by type (Newsletters, flyers, brochures, etc.).

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- The number of visitors to electronic media outlets (Websites, Social Media Platforms [YouTube, Facebook, Twitter, LinkedIn], etc.).
 - The number of documentaries made on the Revenue Protection and Technical Loss Reduction Project as part of its stakeholder engagement activities.
 - The number of external platforms carrying advertisements on the Revenue Protection and Technical Loss Reduction as part of its stakeholder engagement activities.
 - The number of times the Stakeholder Engagement List/Profile has been updated.
 - Communication policy developed and approved
-

7.2 Stakeholder Involvement in Project Monitoring

The implementation and monitoring of the SEP will be a collaborative effort between the stakeholders and the project implementation team. The project implementation team will establish a two-way flow of information where information flows from the project to the stakeholders and vice-versa.

The project monitoring team will conduct mini-evaluations to elicit participants' feedback on all workshops, conferences, and stakeholder engagements. The results of these analyses will feedback on program implementation strategies, when necessary. The objective of stakeholder feedback will be targeted at project implementation improvement. See Annex 5 for a sample of the Evaluation Form. Feedback will also be collected from training workshops and analyzed to improve future training. See Annex 6 for a sample of the Training Response Form. Reports from such feedback and evaluations will be shared internally and with relevant stakeholders based on their position in the influence-interest quadrant. Key stakeholders will be informed via formal project reports.

When the project addresses issues or concerns raised by stakeholders, this will be communicated directly to them. Communication or reporting to stakeholders will be guided by:

- a. The kind of information to be shared, the medium, and the frequency.
- b. Progress of program implementation. The project implementation team will communicate any changes to already agreed or publicized commitments or actions.
- c. Making reports or information readily available in the most dominant local language, including using photos and diagrams to transmit messages.
- d. In addition, the project implementation team will make monitoring results publicly available and will regularly report on the progress of the stakeholder engagements to all stakeholders.

7.3 Reporting to Stakeholders

- a. The principal objective for reporting to the different stakeholders is to respond to their needs. They will be kept informed through public announcements, and customer service centers including information on their complaints and what is being done to rectify them. Customers and the public who contact the Implementing Agency through social media platforms receive responses through the same medium.

- b. In reporting to stakeholders on project planning and implementation, especially concerning how issues of concern to them have been taken on board, the following good practices are considered:
- i. Determine what information needs to be reported to which stakeholders, and by what method and frequency.
 - ii. Disclose progress to affected and interested parties. In particular, publicize any material changes to commitments or implementation actions that vary from publicly disclosed documents.
 - iii. Make monitoring results publicly available, especially reports of any external monitors.
 - iv. Regularly report on the process of stakeholder engagement as a whole, both to those stakeholders who are directly engaged and to other interested parties.
 - v. Include stakeholder engagement reporting in the regular project reporting that is submitted to the World Bank.
 - vi. Translate information reported to stakeholders into local languages and present it in easily understandable formats.

8.0 ANNEXES

8.1 Annex 1: Name of Stakeholders Engaged

Name of Respondent	Position	Organization
Simons Yao Akorli	Director, Regulatory Economics and Research	Public Utility Regulatory Commission
Nathaniel O. Quarcoopome	Director, Finance, and Administration	Association of Ghana Industries (AGI)
Benjamin Boakye	Executive Director	Africa Center for Energy Policy (ACEP)
Andriana N. K. Nelson	Head of EAA Department	Environmental Protection Agency (EPA)

8.2 Annex 2: Grievance Complaints Form

1. Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i> Name: Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i> E-mail: _____ Phone: _____ Address: _____				
Location where grievance/problem occurred (write-in)				
2. Category of Grievance:				
<input type="checkbox"/> Environmental safeguards, social issues, including gender, labor, and resettlement	<input type="checkbox"/> Grievances regarding violations of policies, guidelines, and procedures	<input type="checkbox"/> Grievances regarding contract violations	<input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	<input type="checkbox"/> Grievances regarding of abuse of or power/intervention by project government officials
<input type="checkbox"/> Grievances regarding Project staff performance	<input type="checkbox"/> Reports of force majeure	<input type="checkbox"/> Grievances regarding Gender-Based Violence	<input type="checkbox"/> Suggestions	<input type="checkbox"/> Appreciation
Brief Description of Grievance or Inquiry: <i>(provide as much detail and facts as possible)</i>				
Please include any other information that you consider relevant, other matters or facts, including supporting documents:				
3. Do you request that identity be kept confidential? <input type="checkbox"/> Yes <input type="checkbox"/> No				
4. Previous Efforts to Resolve the Complaint				
5. Information on Authorized Representative. <i>(If Authorized Representatives are not complainants themselves, their names will be disclosed as needed, to ensure transparency).</i>				
Name	Positions/Organizations	Addresses	Contact numbers	E-mail addresses
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Please provide evidence of the authority to represent the complainant which must include the complainant's signature.				
Do you request that identity be kept confidential? <input type="checkbox"/> Yes <input type="checkbox"/> No				

8.3 Annex 3: Grievance Register

GRIEVANCE ID	DATE REPORTED	NAME OF GRIEVANT	GENDER (M/F)	LOCATION/ ADDRESS	ISSUE	PARTIES INVOLVED	DATE INVESTIGATION WAS INITIATED	DATE INVESTIGATION COMPLETED	RESOLUTION/ ACTIONS REQUIRED	DATE RESOLUTION WAS COMMUNICATED TO COMPLAINT	STATUS	DATE RESOLVED

8.4 Annex 4: Call Center Numbers for NEDCO

S/NO.	OPERATIONAL AREA	TELEPHONE NUMBER	
1	Northern	0372024175 & 0372096114/5 0372099979	- Yendi
2	Upper East	0382096362 0244948037	- WhatsApp
3	Upper West	0203779939 / 0203803001 / 0500943408	
4	Techiman	0352091335 / 0203114699 0352197662 0352197674 0202441762 0202442263 0352195748 0322496276 0352195756	- Techiman - Akomadan - Wenchi - Bamboi - Kintampo - Atebubu - Nsawkaw - Nkoranza
5	Sunyani	0352027200 / 0202442202	- Sunyani

8.5 Annex 5: Event Evaluation Form

Title of Event: Date:

Organizer: Time:

Location: Attendance:

Rating Scale: *Below Expectation* = 1, *Satisfactory* = 2, *Average* = 3, *Good* = 4, *Excellent* = 5

Parameter	Rating	Comments
Event Success		
Attendee Satisfaction		
Planning Process		
Effectiveness of Event Materials		
Facilities and Location		

Would you recommend holding this event again?

What improvements should be made for future events?

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Additional Comments:

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8.6 Annex 6: Training Response Form

Title of Event:

Date:

Trainer:

Location:

Please tick the corresponding cell for the appropriate response

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
The objectives of the training were defined well beforehand.					
Participation was encouraged throughout the training.					
The topics covered were relevant and informational.					
The materials and content were well-chosen and helpful.					
The training will be helpful to my work.					
The trainer was knowledgeable about the subject matter.					
The trainer was well-prepared and thorough.					
The time allotted for the training was sufficient.					
The training location was well chosen.					

Additional Comments:

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