

Public consultation on risk preparedness in the area of security of electricity supply

Referring document: Consultation on risk preparedness in the area of security of electricity supply

Feedback and answers received by September 9th 2015 (EOB)

Questionnaire's recipient: Members of the EPPSA Strategy Working Group

- 1 Whilst Directive 89/2005 imposes a general obligation on Member States to ensure a high level of security of supply, the Directive does not specify what measures Member States should take to prevent risks. Would there be an added value in requiring Member States to draw up a plan identifying relevant risks and preventive measures to respond to such risks (risk preparedness plans)?**

This Directive establishes measures aimed at safeguarding security of electricity supply so as to ensure the proper functioning of the internal market for electricity and to ensure a.o. an adequate level of generation capacity;

Given the actual evolution of the electricity system towards a more low-CO₂ energy system, Europe is in some Member States lacking enough reserves of dispatchable energy generation units, which increases the risk for a secured supply of electricity.

Therefore, requiring Member States to draw up a plan identifying relevant risks in relation to an adequate level of generation capacity would be an added value to minimise this risk.

- 2 If yes, what should the minimum requirements such risk preparedness plans should comply with?**

Risk preparedness plans should identify the demand-side measures Member States plan to take. However, it must be ensured that the identified demand-side measure(s) are really and readily available. This is especially true in the case of voluntary load shedding.

- 3 Do you think that it would be useful to establish a common template for risk preparedness plans?**

While a common template would be useful in order to have a compatible overview and to understand if some risks balance out on European level, the common template for risk preparedness should allow for the inclusion of specific regional or national situations.

- 4 Given that electricity markets are increasingly interlinked, should risk preparedness plans be prepared at the national, regional or EU level?**

Given the specificities of the different markets, risk preparedness plans should be prepared on a national level. But the plans must be compatible in order to have a European overview and be able to gauge the risk with which Europe as a whole is confronted.

- 5 Do you see a role for the Commission in assessing these plans? Would you see an added value of having the plans peer-reviewed, at a regional or EU level? What role do you see in this context for the Electricity Coordination Group?**

Electricity Coordination Group has an extensive knowledge regarding the networks and the regulation. However, this knowledge can be increased by including other stakeholders such as Associations, which should be involved as well in order to provide information, knowledge and facts from an industry point of view.

- 6 What level of transparency should be given to the plans? Who should be informed of what?**

All relevant stakeholders on an EU level should be involved and consulted in the creation of risk preparedness plans. This will ensure the coordination and harmonisation among Member States and will also allow for regional and situational specificities to be taken into consideration.

- 7 How often should risk preparedness plans be made / updated? What are the relevant time frames to be covered?**

The appropriate time frame for updating the risk preparedness plans should be based on the evolution of the energy grids in Europe. The blackout in 2006 due to switching off the interconnector over the Ems was broadly considered to have been due to the fact that the line operators relied on recent data but failed to make a new simulation before switching off the line. This shows that even existing data can be outdated very fast.

Therefore, it should be considered if the plans could be drawn up on a yearly basis. This is necessary since we are experiencing an ever-changing generation pattern in the EU, amongst other due to the integration of Renewable Energy Sources. However, the plans should be checked and monitored regularly throughout the year in order to ensure that they do not become outdated.

- 8 Given the challenges that DSOs are facing (e.g. integration of renewables, more decentralised systems), should DSOs take an active participation in the assessment of the risks and preparation of the risk preparedness plans? If yes, do you see the need for separate assessments and separate risk plans at the DSO levels? Or do you believe it is more appropriate to ensure an active participation of DSOs in risk assessments and risk preparedness plans covering the entire electricity system?**

EPPSA believes that it does not make sense to look at this with a silo approach – the entirety of the electricity players need to be considered.

- 9 **Ensuring cybersecurity is an increasingly important aspect of security of supply. What measures should Member States take to protect themselves against possible cyber-attacks or other cyber-related threats? Do you see the need for specific EU rules on cyber security, targeted to the energy field? Given the cross-border nature of cyber security risks, what scope is there for enhancing co-operation (for instance through the exchange of best practices)?**

EPPSA does not have specific expertise in this field, but believes that as the Internal Energy Market is progressively turning into a smart energy system with more and more dependence on data and IT, as well as experiencing increased interconnectivity across the European continent, a European-wide cybersecurity strategy for the Energy sector is vital. The initiative by the European Commission to set up an Expert Group on this topic is a first step in the right direction.

- 10 **In relation to risk preparedness, how do you see the roles and responsibilities of:**

- a. Other stakeholders, such as consumers:

All relevant stakeholders should be involved, especially technology suppliers who know best where the physical limitations of their equipment lies. It is vital to mainly include the dispatchable generation industry in Europe, and it needs to be made sure it is allowed to function properly and render the required service of securing energy supply.

- 11 **Given the fact that many actors are concerned by security of supply issues, would you see an added value in the designation by each Member State of a ‘Competent Authority’ responsible for coordinating security of electricity supply issues at national level?**

Yes, a more coordinated approach to security of electricity supply issues on a national level is necessary, however EPPSA does not believe that this needs to be an exclusive task of a newly-created authority. The oversight could be easily added to existing regulatory bodies.