



Commission for Energy Regulation

An Coimisiún um Rialáil Fuinnimh

## Fuel Security Requirements for Generators

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## CER – Information Page

### **Abstract:**

This paper clarifies the backup fuel requirements for generators and the ways to meet the requirements.

### **Target Audience:**

This paper will be of particular interest to licensed generators.

### **Related Documents:**

- [CER Decision paper on secondary fuel obligations \(CER/09/001\)](#)

### **Queries**

Any queries on this paper, please contact John O'Connell ([joconnell@cer.ie](mailto:joconnell@cer.ie)).

## Background

The majority of Ireland's electricity is generated by fossil fuelled power stations. These fossil fuels are natural gas, coal, oil and peat. If there were an interruption to the supply of any of these fuels this may in turn lead to an interruption to electricity supplies. In order to minimise the impact of a fuel supply interruption the CER requires generators to hold stocks of fuel on site. The level of stocks that must be stored range from 1 day to 5 days. This is reasonably straightforward for coal, oil and peat. Natural gas, however, is not easily stored on a generator's site. Fortunately natural gas units can be designed to run on a secondary fuel. This secondary fuel is distillate oil (also called gas oil). Therefore, natural gas fired generators hold stocks of a secondary fuel on site.

In 2007 the CER held a consultation on the specific requirements that generators must meet. The CER published a decision paper in January 2009<sup>1</sup>.

## Fuel Security Requirements & LNG

As part of the consultation on fuel security requirements the CER considered whether offsite gas storage could be used to meet fuel security requirements. Ultimately the CER decided that offsite gas storage would not give the same level of security as storing fuel on site, i.e. transporting the fuel from storage to the generator's site posed an unacceptable risk.

Shannon LNG (SLNG) is proposing to build a LNG importation terminal on the Shannon estuary. As part of this project SLNG is contemplating building a CHP unit as part of the LNG terminal and asked the CER to clarify the backup fuel requirements for such a unit. As part of its submission on this matter it proposes to hold LNG in storage tanks in the LNG terminal adjacent to the generation unit to meet the unit's fuel security requirements.

The CER considered this submission and whether it meets the fuel security requirements as set out in CER/09/001. The main concern that the CER had with respect to the use of LNG to meet fuel security requirements is the risk of transporting the fuel from offsite storage to the generator's site. This does not arise in this particular case as the backup fuel is stored on the same site. This proposal also has the added benefit of avoiding the need to switch fuels, an area of risk highlighted by EirGrid in its comments on the proposal.

The CER, therefore, agreed with SLNG that LNG stored on the generator's site met the CER's fuel security requirements.

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<sup>1</sup> CER Decision paper on secondary fuel obligations ([CER/09/001](#))