



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

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COVID-19: Technical Questions and Answers for the Energy Markets

Queries List Number 1

Information Paper

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1. COVID-19 Technical Queries

In recent weeks, arising from the ongoing COVID-19 health emergency, the CRU has received a number of technical queries from industry stakeholders in relation to aspects of Ireland's electricity and gas markets.

To deliver transparency, the CRU is publishing a list in section 3 (below), showing the various technical queries received, identifying which of these are currently open / closed, and the CRU's responses. This is particularly focused on those queries which are not specific to any one market participant, i.e. which can be applied more generally across energy market participants. We hope that by publishing this information, we are providing industry and interested parties with useful and timely responses in a coordinated and equitable manner.

This information paper represents Queries List Number 1. The CRU will publish an updated list as needed, incorporating new queries and requests received and the CRU's answers, in order to help keep industry stakeholders informed.

2. Further Technical Queries

For the period of the COVID-19 health emergency, any further electricity generator and energy supplier / shipper queries which are of a technical and general nature, and are related to COVID-19, should be sent to: *industryqueries@cru.ie*

Queries or requests received to this email address (*industryqueries@cru.ie*) will be acknowledged and passed to relevant staff members in the CRU. They will be recorded and responded to where applicable in a published update(s) to this Queries List, as referred to above. This will be indicated in the acknowledgement of the query / request. We will not identify the name of the party that submitted the query in the List, but will rather provide a high-level indication of whether the query is from a generator, supplier, etc (as we have done in section 3, next).

3. COVID-19: Technical Questions and Answers

As noted above, the following list shows recent queries / requests of a general nature received from the energy industry by the CRU with respect to COVID-19, along with the CRU's initial responses. The queries are shown in the order of the date when the queries were received. Minor changes to the query wording have been made where needed for context etc. Where queries are considered answered, at least for the moment, they are indicated as closed and shaded in green.

Currently, queries which are broadly applicable have only been received with respect to the electricity market, except for query 20 which also covers gas; equivalent gas market queries will be added to a later list in future if relevant.

Ref.	Date of Query / Request to CRU	From	Query / Request	CRU Response	Open or Closed
1	10 March 2020	Industry Representative Group	Request for a notice of the following Government protocols should they be developed: (1) Recognise the priority of utilities' services; and (2) Help utility service providers to continue operate essential utilities services and maintain minimum essential service delivery.	The Government's list of essential service providers was published on 28 March 2020 and it includes utility services. Please see the following link for more information: https://www.gov.ie/en/publication/dfeb8f-list-of-essential-service-providers-under-new-public-health-guidelin/ Should further Government protocols be developed, the CRU will disseminate this information to the relevant parties. Currently, Business Continuity Plans for the core utility service providers are in place during this COVID-19 situation. Critical staff and systems have been identified as part of this process, with a view to maintaining continuity of services. These are being continually assessed and updated as the situation develops and in line with Government guidance and direction.	Closed

2	13 March 2020	Generator	Are operational staff at power generation facilities considered to be critical staff?	A Government list of essential service providers was published on 28 March 2020 and it includes electricity generators. Each generation company is expected to adhere to this list with respect to its own staff. Please see the following link for more information: https://www.gov.ie/en/publication/dfef8f-list-of-essential-service-providers-under-new-public-health-guidelin/	Closed
3	13 March 2020	Generator	Request for CRU to engage with EPA to assess if environmental limits would remain when responding to an electricity security of supply issue, i.e. could emission limits be exceeded.	The CRU considers that market participants should, individually or as a group, bring their COVID-19 concerns to the EPA in the first instance on this matter. The CRU would be available to engage with the EPA if and as required, taking account of its various duties and functions.	Closed
4	16 March 2020	Generators	To support planning for normal system operations, generators have requested that EirGrid provide early notification of their planned dispatch schedule.	EirGrid issued the following response to generators, which is aligned to the CRU's position: <i>"There are no changes to operational constraints at present associated with the Covid-19 pandemic. It is of critical importance that the security of the power system is maintained during the Covid-19 pandemic period...Should market participants identify operational risks related to Covid-19 they should inform the TSO as soon as possible via their normal point of contact. Should this instigate a significant change to scheduling and dispatch the TSOs will update this weekly constraints document to reflect this in a revised publication as soon as possible."</i>	Closed

5	16 March 2020	Generator	Can CRU and EirGrid confirm availability of critical staff for the duration of the public health guidance?	The CRU and EirGrid have Business Continuity Plans in place during this COVID-19 situation. Critical staff have been identified as part of this process, including alternates as appropriate, with a view to maintaining continuity of services.	Closed
6	16 March 2020	Generator	Is all non-critical testing (e.g. secondary fuel testing) to be postponed for the duration of the public health guidance?	EirGrid recently decided that secondary fuel testing has been suspended for 4 weeks from 24 March. Another review of this matter will take place in April.	Closed
7	16 March 2020	Generator	Will due consideration and planning be given to generation facilities who may become unavailable through the inability of international “Original Equipment Manufacturers” to undertake necessary maintenance or outage work, and that penalties would not be applied?	Due consideration would be given, taking account of the CRU’s duties and functions, market rules and the system’s security of supply status. This would include the issue of penalties, if relevant.	Closed
8	16 March 2020	Generator	Will incidences of non-compliance with Grid Code and other industry rules be assessed individually and on the merits of the specific circumstances, and that companies that have employed a ‘best endeavours’ approach in the prevailing circumstances, while continuing to respect all necessary safety requirements, will not be penalised, for the duration of the public health guidance ?	Same answer as to query 7, above.	Closed

9	16 March 2020	Generator	Has CRU been in contact with the EPA or other regulators for flexibility in the enforcement of their rules to safely operate the power system?	Same answer as to query 3, above.	Closed
10	16 March 2020	Generator	What contingency has been put in place for the continued operation of the system and the market, assuming this is not possible in all circumstances? a. EirGrid are no longer able to adequately staff their control room (NCC) and/or the necessary systems are unavailable.	EirGrid has a Business Continuity Plan in place to maintain continuity of services during this COVID-19 event. Critical staff and systems have been identified as part of this process, including appropriate contingency planning, with a view to maintaining continuity of services.	Closed
11	16 March 2020	Generator	What contingency has been put in place for the continued operation of the system and the market, assuming this is not possible in all circumstances? b. SEM-O are not in a position to continue to perform central market operations, specifically DAM/IDM/BM and settlement.	Same answer as to query 10, above.	Closed
12	18 March 2020	Generator	Planned Generator Maintenance support is requested from the CRU in enabling essential staff travel to Ireland.	Travel is permitted under the existing Government guidance (correct to the date of publication of this paper) where it is associated with the maintenance of essential services.	Closed

13	18 March 2020	Supplier	What is the CRU doing with regard to charges passed on to suppliers which in turn are passed to the end consumer, for example, ESB Networks and EirGrid Charges? What contingency plans have been put in place for the suppliers when the end customer who is being passed charges cannot afford to pay?	This matter will be kept under active review by the CRU, as the situation evolves. It should be noted that customers' energy bills will typically fall in any event if their energy consumption reduces. Furthermore, the CRU has already instigated special customer protection measures arising from COVID-19, as announced recently. Please see the CRU website for more information: https://www.cru.ie/cru-extends-covid-19-customer-protection-measures-to-assist-consumers/	Open
14	18 March 2020	Supplier	Is the CRU's plan to suspend Standing Charges and Use of System charges to businesses who have or will be closing their doors and have next to zero consumption for the foreseeable future?	Same answer as to query 13, above.	Open
15	18 March 2020	Supplier	Has ESB Networks informed the CRU if they are going to continue to take reads for commercial customers or will this be suspended and what will be the contingency plan should this take place?	ESB Networks has informed the CRU that meter readings have been suspended for the current phase of the COVID-19 health emergency.	Closed
16	18 March 2020	Supplier	For those businesses (essential and non-essential) who are continuing to operate, what is the CRU doing to ensure security of supply for the networks?	The CRU and EirGrid have Business Continuity Plans in place during this COVID-19 situation. Critical staff and systems have been identified as part of this process, with a view to maintaining continuity of services. The CRU is also continuing to actively liaise with Government on these issues.	Closed

17	20 March 2020	Supplier	A supplier called on CRU to suspend network charges and queried the logic for continued application of the PSO levy to bills.	Same answer as to query 13, above.	Open
18	20 March 2020	Generator	Request for feedback from the CRU on the potential for relaxation of the self-isolation duration for power station staff (with the additional temperature monitoring, etc. in place).	All persons should adhere to the HSE guidance on managing COVID-19, including the self-isolation guidance. The need for deviation from this guidance for non-healthcare related essential service providers is being considered on a case-by-case basis.	Closed
19	23 March 2020	Supplier	Commercial energy demand has and will continue to decrease throughout this crisis, but as customer usage is profiled, we are still required to purchase electricity in the Day-Ahead Market markets although customers may not consume any energy, this will not be resettled until Month+4. We have asked MRSO if it is technically possible to allow more actual real time usage to be shared with suppliers in order to be able to more accurately predict demand. If this were to be facilitated, it would reduce the need for excess energy being purchased in the DAM, which would be a great help to cash flow.	The CRU understands that this issue relates to suppliers continuing to see demand in relation to customers who have temporarily closed, as a result of standard profiles being applied by the MRSO on a daily basis to demand aggregation. The CRU is actively considering this issue and will update suppliers by Wednesday 15 th April.	Open

20	23 March 2020	Supplier	In relation to regulated charges from the SEM, PSO, Distribution and Transportation costs across the gas and electricity industry, there must be leniency with these charges in order to supply non-paying customers. Commercial customers who are not consuming will still incur standing charges and PSO charges.	Same answer as to query 13, above.	Open
21	23 March 2020	Supplier	The timeline on payments of the weekly SEM charges must be increased along with a reduction in participants' credit cover requirements during the crisis, in order to support cash flow.	The CRU will keep various charges to suppliers under active review as per the answer to query 13, above. However, the CRU is not proposing amendments to the SEM payment timelines at this point.	Closed
22	23 March 2020	Supplier	Some measures that may be appropriate at this time include: 1. Guarantee the amounts due from businesses to suppliers from say 1 March to a particular date in the future, perhaps the deemed emergency period; or 2. Provide more favourable terms to suppliers for their onward payments to generators, MO's, SO's, (many of whom are State owned) by temporarily relaxing the Credit Collateral obligations; or 3. Extending the credit terms currently offered by these operators as enshrined in	Many of the measures here would be outside of the remit of the CRU and/or would be unduly burdensome for the electricity system or consumers, particularly items 1, 3 and 4. However, in relation to item 2, the CRU will keep various charges to suppliers under active review as per the answer to query 13, above.	Open

			legislation. Currently the credit terms vary from weekly to monthly. Could these all be extended to say 90 days?; or 4. Provide a low interest funding scheme to suppliers to fund increased credit requirements for a period of say 12 months.		
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