

Lucy Cradden
Commission for Regulation of Utilities
The Grain House
The Exchange
Belgard Square North
Dublin 24
D24 PXW0
lcraadden@cru.ie

RE: Identification of National Electricity Crisis Scenarios for Ireland CRU/20/138 (the Consultation)

23 December 2020

Dear Lucy,

Bord Gáis Energy (**BGE**) welcomes the opportunity to respond to this consultation on identifying national electricity crisis scenarios for Ireland with a view to establishing risk plans to address electricity crises.

While the list of scenarios covers a good range of potential events and outcomes one might expect to cause an electricity crisis in Ireland, there are additional scenarios we believe are worth considering before finalising the list. These include:

1. The likelihood of a generation shortfall occurring due to the aging nature of the generation fleet on the island and a potential delay in necessary capacity investment. The forecast narrow capacity margins under the Generation Capacity Statement 2020-2029 coupled with the five amber alerts due to generation shortfall either in Ireland or Northern Ireland between 5/11/2020 – 9/12/2020 warrant consideration of such a scenario in our view;
2. The likelihood of a scenario that requires a risk rating of “critical” or “major” due to the simultaneous occurrence of two or more of the scenarios listed on Table 4 in the Consultation. For example, the combination an extreme weather scenario or a number of unplanned outages of large units on the system together with one or other of the primary equipment or technical failure scenarios could change the risk ratings currently assigned to these two latter scenarios. Consideration may also be warranted to the simultaneous occurrence of the “heatwave and dry spell” / “forest fire” scenarios, given both scenarios’ potential impacts are respectively classified as “critical”/ “major”.

The likelihood of a pandemic arising is considered “unlikely” and despite its “major” potential impact its overall risk rating is “minor”. The consultation’s related explanation references the National Risk Assessment’s (**NRA**) likelihood of pandemic classification as occurring once in every 10 and 100 years. That NRA however was completed in 2017 and given the experience gained since of a pandemic scenario and the high possibility of new strains of COVID-19 and delays in vaccines, consideration of its likelihood of occurrence being “possible” (1 in every 5-10 years) is warranted in our view. Furthermore, re-classifying its likelihood as “possible” may be even further warranted if a “pandemic” coincided with one of the other scenarios listed on Table 4 of the Consultation. Overall, we suggest a review of the scenarios listed in Table 4 of the Consultation in terms of the effect on their risk rating if the scenario coincided with one or more of the other scenarios listed there and flagged above in points 1 and 2.

Reference is made under the “unusually big forecast errors for renewables” scenario to the use of the same forecast vendors in Northern Ireland as in Ireland. Given the “major” impact of such a scenario it may be worth considering if a back-up or alternative source of forecasting is necessary to mitigate the potential risk of loss of load under the scenario.

BGE requests clarity around the planned regularity of assessing these scenarios that feed into risk mitigation planning. Specifically, the scenario of “complexity of power system control mechanism” has a risk rating of “insignificant” at present. The creation of this scenario seems to have been driven by the expected new sources of generation and ICT equipment as well as challenging operational security limits. The consultation acknowledges that future innovation and integration with balancing market control will increase this complexity. Given the extent of new technologies, including renewables and system service providers required to meet 2030 targets, which need to be integrated into systems to ensure a level playing field with

existing market participants, regular revision of this scenario at least is required in line with these expected developments.

We also believe that the mitigation plans that are to be developed on foot of this Consultation should also be subject to public consultation before being finalised and request confirmation that such consultation will occur.

I hope you find the above views and suggestions helpful. Please do not hesitate to contact me should you have any queries related to the above.

Kind regards,

Julie-Anne Hannon
Regulatory Affairs – Commercial
Bord Gáis Energy