



Lucy Cradden
CRU
By email

24 December 2020

REF: CRU20138 – Identification of National Electricity Crisis Scenarios

Dear Lucy,

Thank you for the opportunity to comment on the many risks that face the operations of the industry. We welcome the fact that these are being identified with the intention, it is hoped, to be monitored and mitigated by developing strategies, where possible. A significant number of these risks would impact ESB GT directly, so we welcome your engagement with industry, and we are welcome to discussing issues going forward.

Below I have commented on the top 4 that you have identified, and we agree with the ranking and impact you have given them.

(A) Storm Risk

For completeness the particular risk impacts on generation are not called, but for completeness we believe these risks to be:-

- Storm damage to Overhead lines causing generation outages.
- Windspeeds too high for safe operation of Wind turbines, significantly reducing generation output.

(B) Risk of Cyber attack (for entities connected to the grid)

With regards to Generation, the ability to shut down multiple generators is small, as they are in multiple locations, consist of a mix of different technologies and OEMs, and ESB Does not control the units from a single location. The major risk for generation is in "importing" an impact (ie via a successful attack on the TSO / DSO) which could have significant *consequential* impact on generation.

(C) Risk of unusually big forecast errors for renewables

Forecasting (and the associated risk) resides with the TSO when determining the balancing within the DAM and the IDM and the proceeding consequences in securing power.

(D) Risk of fossil fuel shortage (incl Natural gas)

We trust that commercial gas supplies retain the current levels of risk that you identify. However, we would consider it prudent that the CRU has regard to other fuel diversity risks that may be on the horizon.

In addition to the above

Related note on Flooding risk (Minor):

The CRU has downrated the risk of flooding in line with the National Risk Assessment (NRA) based on historical data. Without having the specific data used and given our recent experiences over the last 5 years our view is that that historical data trend perhaps understates the risk of flooding .

As Always ESB GT is happy to discuss our response and also support you in your mitigation plans.

Yours Sincerely

Jagtar Basi
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ESB GT