

# ELEXON'S RESPONSE TO THE ENTSO-E CONSULTATION 'RISK PREPAREDNESS REGULATION: PROPOSAL FOR METHODOLOGY FOR IDENTIFYING REGIONAL ELECTRICITY CRISIS SCENARIOS'

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## 1. Introduction

- 1.1 This is a copy of ELEXON's response to the above ENTSO-E consultation, which ran between 8 July 2019 and 8 October 2019.
- 1.2 The formatting of this response is unusual as it was an internet-based survey and this is a copy of the returned pdf response, but with the Questions asking for personal information and Questions that we did not answer removed from this copy.

Steve Wilkin, 8 October 2019

## 2. Our response to ENTSO-E

### APPENDIX III

#### 1. Does Appendix III Crisis Scenario description template require a change or clarification?

**Please propose an alternative wording and add an explanation why this change is needed, or specify your question regarding this article.**

ELEXON Limited is a 'delegated operator' as defined in the Electricity Regulation of the Clean Energy Package. Our roles include being responsible for balancing mechanism settlement and imbalance settlement and related reporting in Great Britain.

We have one observation and a follow-up question.

The information provided by TSOs should consider the possibility that cross-border market coupling and/or that European, or local balancing markets in different Member States, may be suspended. This appears to be permitted in the development of national rules pursuant to the Network Code on Emergency and Restoration Chapter IV.

In addition, perhaps that the rules of the European balancing platforms may need to cover situations where there has been a crisis in a participating TSO's control area so preventing the power flows scheduled by those platforms from being physically delivered, including to/from other participating TSOs.

Therefore, TSOs and ENTSO-E should be encouraged to consider these aspects when completing their crisis scenario templates as they may affect the evolution of the crisis at both regional and national levels.

So our question is: does ENTSO-E consider that the proposed wording of the templates will be sufficient to encourage TSO and ENTSO-e to consider the impact that the operation of national rules for market suspension and of European rules for market de-coupling could have at both national and regional levels in each crisis scenario?

Examples.

- 1) The checklists in Annex III.1 and Annex III.2 both mention the evolution of the crisis scenario. In addition, Annex III.2 gives some aspects to consider. However, in both these Annexes, there is no mention of the impact of the market and market suspension rules on the evolution of the crisis.
- 2) The cross-border dependencies checklist in Annex III.3 mentions the 'availability of energy support', but EU and national market rules affecting this availability of energy support are not explicitly mentioned as a factor to be considered.

END

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