



**ERGEG Consultation on Draft  
Guidelines of Good Practice for  
Operational Security**

**EirGrid Response**

**June 2008**

## **EirGrid Response to ERGEG Public Consultation on Draft Guidelines of Good Practice for Operational Security (Ref: E08-ENM-02-04)**

EirGrid welcomes the opportunity to provide input to the consultation on the draft Guidelines for Good Practice (GGP) for Operational Security, and considers that such European-wide Guidelines have the potential to improve operational security across Europe.

EirGrid is a member of ATSOI (Association of TSOs in Ireland) and a part of one of the smallest synchronous systems in Europe. EirGrid considers that it is imperative that the Guidelines are suitable for application to, or can be adapted for, small synchronous systems, such as ATSOI, in addition to large meshed systems, such as UCTE. Furthermore, it is important that the guidelines do not lead to unnecessary duplication of resources by TSOs, but rather are flexible enough to allow for the guidelines to be met in different ways depending on the different obligations and circumstances already prevailing in different jurisdictions.

**Scope:** The consultation paper proposes that the guidelines specify at a “meta-level” which issues must be defined and implemented within the technical rules and codes, but that any actual and detailed technical issues must remain an issue for the rules and codes. EirGrid agrees that it is important to keep the technical detail in the individual TSO codes, recognising that each system has different technical characteristics, with individual codes reflecting the differing requirements.

**Roles & Responsibilities:** The paper lists the roles and responsibilities of the different stakeholders. The role of the TSO in the proposal is particularly wide-ranging. Some of the reporting and data exchange requirements in the consultation paper would require a significant amount of additional reporting and data exchange, particularly in the areas of load forecasting, outage scheduling and capacity calculations. Such additional obligations would be onerous and would impose significant costs on smaller synchronous systems, such as ATSOI. EirGrid further notes that some of the reporting requirements are already being undertaken by the TSOs, though on a somewhat less formal basis. To avoid duplication, it is desirable that the reporting requirements should be able to be met by reporting already being undertaken by individual TSOs.

**Rules:** The general provisions in the consultation paper state that rules adopted in each synchronous area may differ to match specific constraints or specific technical practices. EirGrid considers that it is important that rules can, indeed, differ between different synchronous systems and can be carefully examined by the TSOs to ensure compatibility with current operational standards and practices. This is largely because the operating standards at UCTE level are very different to the standards for a smaller synchronous systems such as ATSOI. The

rules applicable to large synchronous systems may therefore not be appropriate for application to smaller systems.

**Drafting Procedures:** The paper requires the TSOs of each synchronous area to jointly adopt operational rules (as is already the case for ATSOI). The paper also states that the TSOs should jointly define a drafting procedure for rule drafting, which should provide for both internal and external consultation. EirGrid notes that in Ireland there are Grid Code Review Panels (Republic of Ireland, Northern Ireland, and a joint panel for matters of common governance) which include provisions for external consultation on code changes. EirGrid therefore considers that any additional consultation requirement would be duplicative and, therefore, the Rule Drafting requirements should be able to be met by procedures already undertaken in individual systems.

**Compliance Monitoring:** The consultation paper states that the TSOs of each synchronous area shall jointly establish a compliance monitoring process. EirGrid notes that, at present, there is no provision for joint compliance monitoring. Rather, compliance in each jurisdiction is the responsibility of the TSO of that jurisdiction. The *process* for compliance monitoring is defined in the Grid Codes. The *procedures* are on a case-by-case basis and not published.

**Technical Framework for Operational Security:** EirGrid supports the provisions in the consultation paper covering Security Criteria, Transmission Capacity Calculation and Operational Planning and notes that they are broadly in-line with current practices. In respect of the provisions for Network Operation, Emergency Operations and interoperability, EirGrid would like to make the general note that, while the general principles should be similar between synchronous areas, the detailed provisions need to be able to differ significantly between synchronous areas.

**Training:** The General Provisions in the consultation paper provide for greater coordination and cooperation in the training of dispatchers. EirGrid agrees that the training of dispatchers in control centres for the purposes of Operational Security could be defined by the general provisions. However, EirGrid also notes that control room operators in different jurisdictions perform different roles in addition to operating the system in a safe and secure manner. The training provisions should therefore be flexible enough to account for the different roles of dispatchers in different jurisdictions.

**Glossary:** EirGrid notes that terminology currently used by the TSOs and that used in the GGP would have to be carefully monitored and aligned where necessary.

Finally, and at a general level, EirGrid considers it important that the provisions recognise the interaction of energy markets and system operation.