



**NETWORKS**

ESB Networks Response

Regulatory Authorities Minded to Decision Paper on  
the Process for the Calculation of Outturn Availability

SEM-15-14

14<sup>th</sup> April 2015

## 1. Introduction

ESB Networks welcomes the opportunity to respond to the Regulatory Authorities Minded to Decision Paper on the Process for the Calculation of Outturn Availability.

The following response includes ESB Networks comments and suggestions on the 'Minded to Decision Paper on the Process for the Calculation of Outturn Availability' and the minded to decisions posed in the paper.

ESB Networks looks forward to continued engagement on this topic and is open to any future discussion with the Regulatory Authorities.

## 2. Submission

ESB Networks suggests that any changes to the current custom and practice should take into consideration any market restructuring, emerging from the ISEM consultations.

### ***Outage Information for Publication***

The Regulatory Authorities ‘Minded to’ decision paper suggests the need to publish outage information.

#### **ESB Networks Response:**

ESB Networks suggests that it is not clear as to the purpose of publishing any detail on ‘standard’ outage durations. Actual outage durations are often station and plant specific and the generator outage plan reflects the outages of non-wind generators. It may be possible to provide a table of planned maintenance tasks (based on EirGrid’s document – ‘Guide to Maintenance Activities’) and typical outage durations which prevailed prior to the new work methods introduced last year.

However, the impact of revised methods and the need to establish a Designated Work Area (DWA) in stations has been shown to have some impact on outage durations, and also the extent of an outage. At this time, it is too early to advise what that impact might be. For this reason, ESB Networks would suggest that it would be better not to publish any detail on outage durations until the impact of the new work methods is better known.

### ***4.6 Generation Outage Planning – RA’s Response***

*The RA’s recommend that a forum is created by the TSOs and include the relevant stakeholders that would discuss methods to improve outage communications and the processes involved, with the objective of agreeing an improved process.*

#### **ESB Networks Response:**

In relation to a forum, ESB Networks suggests that a Terms of Reference be circulated on this forum prior to a final decision being made as to the requirement for same.. If such a forum were to be established ESB Networks (as Transmission System Owner) should have a definite role.

In relation to outage planning, ESB Networks suggests that such a forum may also be of value to distribution connected generators and, if such a forum was created, an invite could be extended to these customers.

### **6.3 Outage Planning**

*An Ex Post summary report of the outage schedule should also be published at the end of each outage season. This will detail all works carried out over the period. The outage time for each of the works will be identified and compared against the pre-determined targets agreed between the parties and communicated in the outage plan. This review should be in the form of a public document.*

#### **ESB Networks Response:**

ESB Networks would like clarity on what the out-turn is to be compared to when publishing the out-turn of the outage season.