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Information Note

Temporary Emergency Generation

Version 1.0 26 March 2025

Background

In September 2021, the Commission for the Regulation of Utilities (the 'CRU') published the Security of Electricity Supply Programme of Actions Information Paper[1] outlining a programme of work to address a potential capacity shortfall in Ireland.

As one of the actions under this programme, Temporary Emergency Generation ('TEG') has been procured and installed under the direction of Government and the CRU, pursuant to the provisions in the Risk Preparedness Plan for Ireland (the 'RPP')[2] and the EirGrid, Electricity and Turf (Amendment) Act 2022[3]. The dispatch of these non-market units is subject to Article 16(2) of Regulation (EU) 2019/941 on Risk Preparedness in the Electricity Sector[4].

Further to questions raised by market participants and presentations made by EirGrid at Market Operator User Group ('MOUG') meetings in 2024, this **Information Note** outlines the operational treatment, market treatment, and transparency requirements related to the dispatch of the TEG units. Additional information may be found in the most recent version of the EirGrid and SONI Balancing Market Principles Statement. A set of **Frequently Asked Questions** is included toward the end of this document, which address specific questions that have been raised by stakeholders.

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[1] CRU21115-Security-of-Electricity-Supply--Programme-of-Actions.pdf
[2] https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU_202346_Risk_Preparedness_Plan_May_2023.PDF
[3] https://www.irishstatutebook.ie/eli/2022/act/17/section/3/enacted/en/html#sec3
[4] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0941

Temporary Emergency Generation ('TEG') procured under the programme

TEG capacity has been procured under two tranches (TEG 1 and TEG 2), totalling c.650 MW of capacity that can be dispatched in under 15 minutes.

	Location	Capacity
TEG 1	North Wall	193 MW
	Huntstown	50 MW
TEG 2	Shannonbridge	256 MW
	Tarbert	150 MW

The service periods for these units are as follows:

1) The TEG 1 units have an initial service period of 36 months from service commencement, with an option for EirGrid to extend the arrangement by up to two additional periods of 12 months each (3+1+1 years). The first of these units became operational and commenced service at the end of 2023.
2) The TEG 2 units fall under the EirGrid, Electricity and Turf (Amendment) Act 2022 which allows for an initial services period up to 31 March 2027 with the option, to extend to no later than 31 March 2028, subject to order by the Minister for Environment, Climate and Communications.

Requirements

Article 16(2) of Regulation (EU) 2019/941 on Risk Preparedness in the Electricity Sector further requires that.

1) Non-market-based measures shall not unduly distort competition and the effective functioning of the internal electricity market.
2) They shall be necessary, proportionate, non-discriminatory and temporary.
3) The competent authority shall inform relevant stakeholders in its Member State of the application of any non-market-based measures.

Objectives

Having considered these requirements, the operational and market treatment of TEG is informed by the following objectives:

1) Securing the power system in Ireland, as directed by the CRU.
2) Minimising the impact on the wholesale markets.
3) Utilising existing market and control room tools, systems, and processes to the maximum extent possible.
4) Matching the scale and complexity required without needing to make wholesale changes to the Market Management System ('MMS') for generators that would be dispatched on a very infrequent basis (including practical measures - such as treatment of individual generators as one TEG unit).
5) Adopting a single approach to the dispatch of all TEG units.
6) Minimising as far as possible the need to dispatch these units.
7) Integrating with existing power system emergency processes and procedures.

Market treatment

The treatment of TEG in the Single Electricity Market ('SEM') is based on the following principles:

1) Ex-ante markets: TEG units are not permitted to participate in Ex-Ante Markets. Ex-ante market prices and volumes, as well as ex-ante market imports/exports schedules should therefore be unaffected.

2) Capacity market: TEG units do not participate in Capacity Market auctions. They do not hold reliability options or receive capacity market payments and will not be subject to difference charges.

3) Ancillary services market: Operators of TEG units are not contracted to provide or receive revenue for ancillary services. The scheduling and dispatch of TEG units should in so far as possible not impact other ancillary service providers.

4) Balancing market: The TEG units have a presence within the Balancing Market ('BM') and participate in the Balancing Market (BM) but do so differently from other market units. They are normally unavailable for balancing actions but will only be made available for dispatch when security of supply risk has been identified and where it is evident that market-based measures alone are not sufficient to prevent a further deterioration of the electricity supply situation. They are made unavailable to the BM when security of supply risk has abated.

   The TEG units are required to submit complex offers subject to Bidding Code of Practice (not simple offers). Commitment and dispatch are based on a pre-determined relatively high incremental prices which overwrites the submitted complex offer prices to minimise utilisation. All actions are flagged as non-energy. The operators of these units receive payments and charges from the BM. Any Infra Marginal Rent received by a TEG through the BM is in turn paid to EirGrid to the benefit of use of system customers.

   Dispatch of the TEG units by the System Operator will appear in BM reports.

Operational treatment of TEG units

The capacity provided by TEG units is treated as follows ahead of real-time operations:

1) Outage planning: TEG capacity is not included in margin calculations for the purpose of scheduling planned outages. TEG capacity may be considered as a risk measure in the event of local system outages with critical safety / system conditions.

2) Net Transfer Capacity (NTC) calculations: TEG capacity may be included in day-ahead NTC calculations, so as to avoid unduly restricting market exports.

3) Outlook: The System Margin Outlook, issued twice a week, provides two separate margin calculations - i.e. with and without TEG capacity included (link).

The criteria for including TEG capacity in margin calculation and for dispatching TEG units under tight margin conditions are as follows:

1) System state: When system margin calculations for Ireland indicate that the system would enter **Alert State** or **Emergency State** in the absence of TEG capacity, this capacity is included in the margin calculation. The system will then remain in **Normal State** if available TEG capacity is adequate to address the shortfall (see figure 1). This applies whether the TEG units have or have not been dispatched, given their rapid ramping capability (i.e. in under 15 minutes). A system **Alert State** or **Emergency State** is issued by the System Operator when the relevant criteria for these states are met after TEG has been included in margin calculations.

2) Market transparency: A Market Notice (system **Margin Warning**) is issued in real time when the power system in Ireland would otherwise be in Alert or Emergency State (in the absence of TEG).

3) TEG dispatch: The TEG units are dispatched once a **Margin Warning** has been issued (where time permits), and where it is evident that market-based measures alone are not sufficient to prevent a further deterioration of the electricity supply situation – having factored in the periods at which energy-limited resources will be dispatch (e.g. hydro, batteries, DSUs). Where time does not permit, a **Margin Warning** will be issued after the units have been dispatched.

4) Prioritisation of TEG units: The dispatch priority of individual TEG units will be guided by operational considerations and nature of the scenario and related system threats at the time, including available run-hours of each of the TEG units, operating cost (gas vs. distillate), logistics (replenishment of fuel stocks), ramp times, and any known risks to reliable operation of the units.

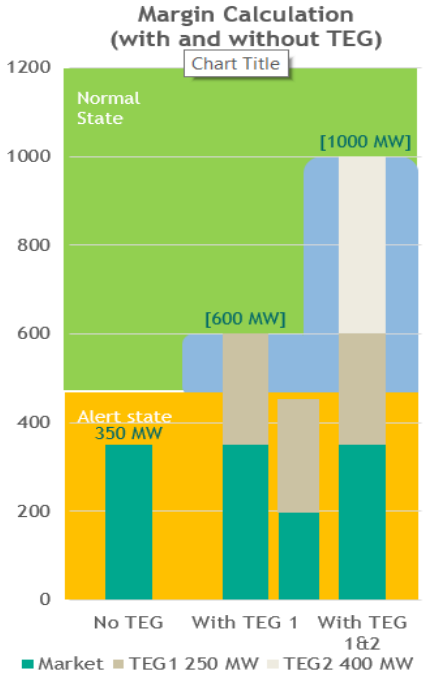

Figure 1 – Illustration of system state (Normal vs Alert State) with and without TEG units, showing effect of including TEG capacity under a Margin Warning (blue)

In order to assure the availability of TEG units when they might be required at short notice, these units may be tested from time to time. These units may be dispatched without issuing a Margin Warning in the following cases:

1) Testing by the System Operator: To confirm the availability and response times under operational testing. This is in line with the process for other thermal units that are not regularly dispatched via the balancing market.

2) Testing by TEG operators: For the purpose of ensuring the operational readiness of the units. The TEG units are required to have a Physical Notification (PN) communicating expected generation levels during testing on the day. The TEG units are required to have a PN for testing on the day.

Section 3.1(a) of the RPP sets out the priority of measures to be applied as system margins become tighter. The capacity provided by TEG units may be included in system margin calculations when the system would otherwise be in Alert or Emergency State. This is summarised below.

Figure 2 – Summary of System Operator actions to manage tight system conditions.

System State (indicative margin)		System Operations actions
no TEG	with TEG	
		Continuous scheduling & dispatch
		Cross-border trades on EWIC/Greenlink/Moyle
		Demand side (DSU's)
		Peakers
		Batteries
n/a	450	**Issue Margin Warning** *Available non-market generation counted in margin (in lieu of Alert)*
n/a		Cross-border trades on EWIC/Greenlink/Moyle to avoid TEG dispatch
n/a		Request ESBN Beat the Peak Demand Reduction (if not already)
n/a	300	Flex Demand (contracted demand reduction)
n/a	200	Dispatch Non-Market Generation (TEG)
n/a		Cross-border trades on EWIC/Greenlink/Moyle to reduce/exit TEG
450	[450] TEG included	**Issue System Alert State** *Loss of largest single infeed after inclusion of non-market generation*
		Emergency Assistance (EA) - interconnectors (EWIC/Greenlink)
		ESBN (NDCC) prepares / staffs up for Demand Control
		Large Energy Users (LEUs) prepare / staff up for possible MDC
		Maximise Jurisdictional Margin (margin support from Northern Ireland)
150	[150]	Invoke PSECP process
		Voluntary Demand Reduction (VDR) request issued
		Public Appeal
50	[50]	**Issue System Emergency State** *Jurisdictional dynamic reserve < c.50 MW*
		Emergency Instruction (EI) - issued for interconnectors (EWIC/Greenlink)
		Mandatory Demand Curtailement (MDC) - instruct
		EBSN VDR Requested (Customers 38kV and above)
		Emergency Demand Disconnection (Rapid) Instruct
		Emergency Demand Disconnection (Slow) Instruct
		Rota Demand Disconnection (up to 3 x 1000 MW)

Transparency and reporting

Article 16(2) of Regulation (EU) 2019/941 requires the Competent Authority (CRU) to inform relevant stakeholders in its Member State of the application of any non-market-based measures. In addition to the information included in the Risk Preparedness Plan, EirGrid supports the CRU in the provision of this information by:

1) Issuing a "*System Margin Warning*" notice to the market when TEG units have been taken into consideration in system margins to avoid Alert or Emergency State in Ireland, or to support the power system in Northern Ireland.

2) Publishing on its website a list of the dates and times when the TEG units have been dispatched under a System Margin Warning.

3) Publishing System Margin Outlook reports twice a week showing the outlook with and without the capacity provided by TEG units.

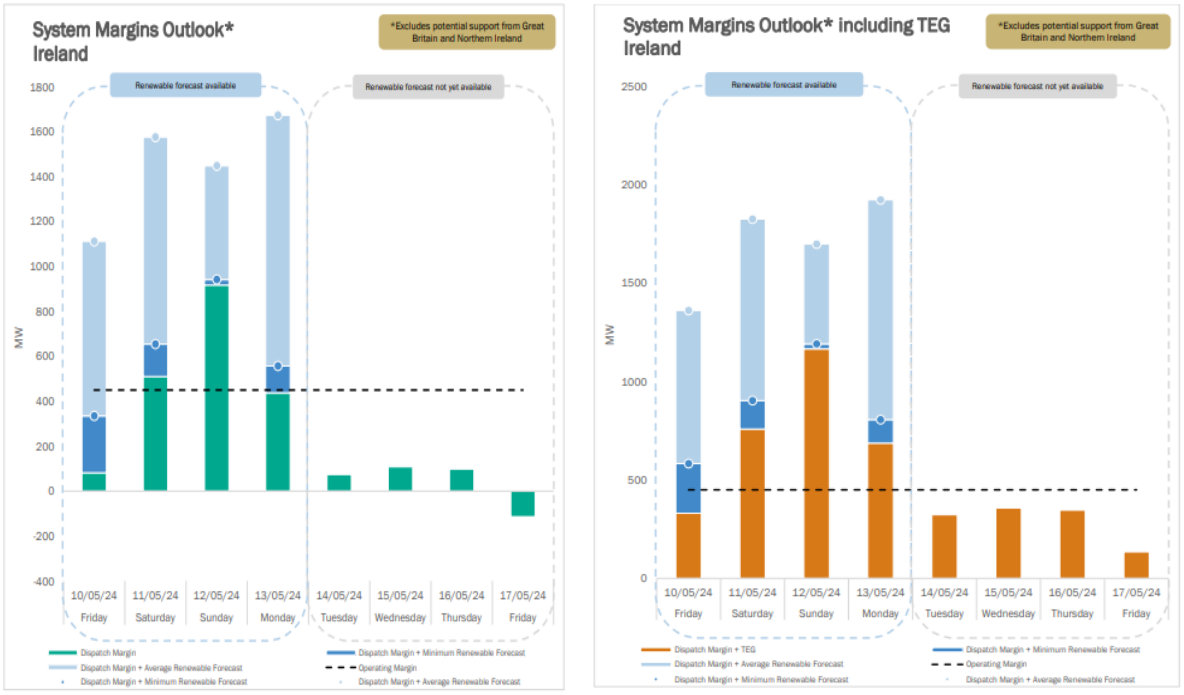

Figure 3 – Example of the System Margin Outlook with and without TEG capacity included.

Solidarity with and support for Northern Ireland electricity consumers during an electricity crisis

Section 3.2 of the Risk Preparedness Plan for Ireland (the "RRP") addresses regional and bilateral procedures and measures. Section 3.2.(a) of the RRP specifically includes reference to Article 14 of Regulation (EU) 2017/2196 (so called 'NCER') (Inter-TSO assistance and coordination in emergency state), which obliges the TSOs to provide assistance to interconnected TSOs, including specific actions in the case of DC-connected systems, provided this would not cause an emergency or blackout state to occur on their own system.

Table 2 (on page 44) of the RRP on the 'Indicative priority of SO actions to dispatch TEG as well as EirGrid and SONI operational policy, makes provision for SONI to erode system margins in Northern Ireland and enter Alert State to prevent Ireland from entering an Emergency State (implementing demand control). Similarly, current practice has been for on jurisdiction to erode system margins and enter Alert State to prevent the other jurisdiction from entering an Emergency State.

For this reason, EirGrid will issue a Margin Warning if Ireland would otherwise have entered Alert State to prevent Northern Ireland from entering Emergency State. EirGrid may also dispatch the TEG units if required to prevent load shedding or reduce the volumes of load shedding in Northern Ireland. The operational protocol for supporting the power system in Norther Ireland, supported by the CRU in its capacity as the Competent Authority under Regulation 2019/941 on Risk Preparedness in the Electricity Sector, is outlined below.

Where North-South Tie-Line limits allow, and EirGrid does not have spare market capacity to support Northern Ireland without the system in Ireland entering Alert State:

1) EirGrid will, on request for assistance from SONI, issue a Margin Warning after:
    a) SONI and EirGrid have maximised trades from Great Britian on the interconnectors
    b) SONI has issued an Alert state
    c) SONI has invoked Emergency Assistance on Moyle
2) EirGrid will dispatch TEG units to prevent or minimise demand control in Northern Ireland, as a last resort, after
    a) SONI has invoked its Power System Emergency Communications Plan (PSECP).
    b) SONI has issued a public appeal for voluntary demand reduction in Northern Ireland.
    c) SONI has issued an Emergency Instruction to terminate exports on Moyle.
3) Where time does not permit all or some of the actions in (1) and (2) to be undertaken, EirGrid may, on request from SONI, support Northern Ireland by dispatching the TEG units, following which all the actions in (1) and (2) will be implemented without delay to reduce (or negate) the need for such support.
4) SONI will not issue any Margin Warnings; only Alert and Emergency states will be issued in Northern Ireland.
5) SONI will not include TEG capacity in its Net Transfer Capacity (NTC) margin calculations for the Moyle interconnector – i.e. TEG capacity available in Ireland will not avoid NTC reductions where needed to avoid a System Alert state in Northern Ireland.
6) The dispatch of TEG to support Northern Ireland will be subject to EirGrid's assessment of available TEG run-hours.

Frequently Asked Questions

In response to questions that arise from time to time in relation to the treatment of TEG units in the Balancing Market (BM), the following information is made available and may be updated from time to time:

Under what conditions might the TEG units be dispatched operationally by the System Operator?

TEG units will be dispatched under tight margin conditions in Ireland:

- When a Margin Warning has been issued, and
- Where it is evident that market-based measures alone are not sufficient to prevent a further deterioration of the electricity supply situation – having considered the dispatch of energy limited resources on the day (e.g. hydro, batteries, DSUs).

TEG units may also be dispatched to support the power system in Northern Ireland, subject to the requirements outlined under the section in this document on "*Solidarity with and support for Northern Ireland electricity consumers during an electricity crisis*".

Under what conditions might the TEG units be dispatched for test purposes?

Units may be tested by the TEG operators or by the System Operator to confirm their operational availability when required at short notice. The following conditions apply when the units are tested by the TEG operators:

- A Margin Warning will not be issued by the System Operator when TEG units are under test.
- The TEG units are required to have a a Physical Notification (PN) for testing on the day.

Have any Margin Warnings been issued to avoid a System Alert state?

- Five (5) Margin Warnings were issued in the period from when TEG units became available to the date of publication of this Information Note (26 March 2025). There were on 18 July 2024 (15:25 to 20:30), 23 July 2024 (17:08 to 19:00), 11 December 2024 (15:30 to 20:30), 12 December (14:30 to 20:00), 8 January 2025 (15:30 to 19:30).
- On one of these days, 8 January 2025, a new record system peak of 6,024 MW was reached at 17:47 (for Ireland).

Have TEG units been dispatched since their introduction to the power system?

- While Margin Warnings have been issued, at the date of publication of this Information Note, the TEG units have not yet been dispatched under a Margin Warning by the System Operator.
- The System Operator dispatched the TEG units for an availability test at the beginning of winter. The full test, initiated by the National Control Centre ('NCC') just before midday on 8 November 2025, was successfully concluded in under 45 minutes.
- The TEG are also dispatched from time to time for availability testing by TEG operators.

How are TEG units priced in the Balancing Market (BM)?

- TEG units submit (and would be settled on) complex Commercial Offer Data ('COD') - and as such are cost-reflective offers.
- The TEG operators will receive payments from the Balancing Market.
- Infra-marginal rent is returned to EirGrid (ultimately the IE customer base) when the TEG units are dispatched.

How is the dispatch of TEG into the BM managed to minimise market distortion on both BM pricing and volumes available to market participants in the BM?

- TEG units are flagged as non-energy, this will reduce the TEG's impact on setting the Imbalance Price.
- If a TEG unit is under test and is dispatched in accordance with its Physical Nomination ('PN'), there will be no TEG volumes included in the Net Imbalance Volume ('NIV'); the unit will not directly contribute to the Imbalance Price.
- The MWs produced may impact the NIV but is settled at the Complex COD price and is cost reflective.

Is TEG availability considered in the calculation of reserves for Administered Scarcity Pricing?

- No, TEG units do not form part of the reserve calculation for Administered Scarcity Pricing.

The European Guidelines on State Aid for Climate, Environmental Protection, and Energy 2022 state that during periods when TEG is dispatched, imbalances should be settled at the Value of Lost Load ('VoLL'). Is this measure being applied in the SEM and if not, what alternate measures have been applied to avoid scarcity dampening?

- TEG is not strategic reserve under Article 22 of EU Regulation 2019/943.
- TEG is a measure taken to prevent or mitigate an electricity crisis, and it comes under EU Regulation 2019/941 on risk-preparedness in the electricity sector.
- Article 16 of EU Regulation 2019/941 sets out how the dispatch of TEG shall comply with market rules.
- Actions taken when dispatching TEG due to system events are flagged as non-energy actions and the volumes are not included in the margin calculations; there is no impact on scarcity signals or scarcity pricing.

What are the REMIT obligations in terms of testing and dispatch?

- TEG units are advised to implement REMIT obligations, similar to larger units.

Has market pricing been considered as part of a decision to schedule testing?

- The primary consideration for scheduling testing is the status of the system and ability to accommodate the various tests being sought.
- We recognize the need for the units to maintain their readiness, as well as the impact that regular testing might have on the market. Where operators seek such tests, we engage to manage the frequency of these. We also seek to have these tests carried out at non-peak times to minimise the impact on the balancing market.

Has TEG testing resulted in increased curtailment or constraints of renewable or conventional generation units?

- Testing of units (TEG or non-TEG) can displace conventional/RES generation however the impact is not considered material due to the duration of the tests.
- Conventional Generation Units that have been dispatched away from their market position (Final Physical Notification – 'FPN') can be paid up to their incremental / decremental prices based on their Commercial Offer Submission.
- Renewable Generation Units that have been dispatched below their market position (FPN) can be paid up to the imbalance price for the applicable settlement period.

Can the impact of TEG on BM pricing and on market participants' revenues be shared with the industry?

- This information is not available as the inputs required for such calculations are not available. BM pricing is a complex calculation calculated by the market management system on a half hourly basis based on the commercial and technical offer data (COD/TOD) submissions. The COD and TOD are available to market participants.
- The impact of TEG testing could change the NIV and impact overall schedules.
- All bid and offer information is published in the same way as any other unit in SEM.

How frequently are TEG units tested?

- EirGrid have a policy of testing units which have not been dispatched for some period which is currently being updated. We anticipate that testing by the System Operator may be conducted every 6 months or, if no recent test has occurred, in advance of a perceived period of very tight generation adequacy.
- The System Operator conducted a test on the available TEG units for the first time on 8 November 2024. A market message was issued citing requirement to perform the test 'as preparation for the winter peak demand period'.
- Other tests undertaken are at the request of the TEG Operators.

What measures have been taken to ensure that TEG will not distort cross-zonal markets and be dispatched in order to avoid setting high imbalance prices through imports at times of system stress?

- Units would be dispatched in accordance with Section 3.1.(a) of the RPP as detailed also in Section 5 of the Balancing Market Principles Statement.
- TEG units will only be dispatched where it is evident that market-based measures alone are not sufficient to prevent a further deterioration of the electricity supply situation – having considered imports, cross-border trades, and the dispatch of energy limited resources on the day (e.g. hydro, batteries, DSUs).

Are TEG units considered in margin calculations when determining whether or not Administered Scarcity Pricing is triggered?

- TEG units do not form part of the reserve calculation for Administered Scarcity Pricing ('ASP'). ASP is triggered when both scarcity and load shedding are happening. TEG would not stop that being triggered.

How is the treatment of infrastructure associated with TEG (grid connection, gas connection, fuel storage facilities, etc.) addressed after the decommissioning of TEG generation?

- In the case of TEG 1, the treatment of relevant infrastructure will be in accordance with the contracts with each service provider.
- In the case of TEG 2, the treatment of the infrastructure will be strictly in accordance with the relevant legislation (EirGrid, Electricity and Turf (Amendment) Act 2022) and in accordance with any direction(s) of the CRU.

Are TEG units subject to requirements around cost-reflective bidding and compliance with REMIT legislation?

- TEG units are required to submit (and are settled on) Complex COD and as such are cost-reflective offers.
- Compliance with REMIT is a matter for each service provider.

Do bids associated with TEG units determine the order in which these units will be dispatched in response to a Security of Supply event??

- When a decision is made to dispatch TEG, and where time permits, EirGrid operational policy on the treatment of temporary emergency generation requires that the dispatch priority within the TEG group of units will include the following considerations:
    - Operating costs (complex offers submitted by TEG operators)
    - Available daily and annual run-hours
    - In the event of a natural gas emergency, TEG 2 units may be prioritized as TEG 1 units operate on gas.
    - In the event of concerns related to liquid fuel stocks/replenishment, TEG 1 units may be prioritized.

Do additional non-price REMIT obligations apply to TEG units? For example, requirements around notifying market participants around changes to availability etc?

- Compliance with REMIT is a matter for each service provider.

Have arrangements been implemented to ensure that all monies received by TEG projects are passed to EirGrid and subsequently passed on to the consumer?

- TEG units will submit (and are settled on) Complex COD and as such are cost-reflective offers.
- The TEG operators will receive payments from the Balancing Market.
- In the event of higher that Complex COD pricing in the balancing market, any infra-marginal rent is returned to EirGrid (ultimately the IE customer base) when the TEG units are dispatched.
- The arrangements are in place to enable same under the respective contracts.

Can TEG providers recover costs associated with the construction, testing, maintenance, and operation and decommissioning of TEG units? Are there additional components which are covered by this mechanism?

- The costs that can be recovered are included in the contracts with the TEG operators. These costs cover consent (where applicable), construction/delivery, testing, the provision of service, and finally decommissioning of the TEG plant.

What processes have been implemented to ensure that costs associated with TEG have been incurred efficiently?

- The Security of Supply Programme initiated to oversee the procurement of TEG and the development of rules associated with the operation of TEG.
- There is continual oversight of the costs by the SoS Programme.

Has scrutiny been given to the costs incurred by TEG providers to ensure that no undue profits have been recovered through TEG provision, including profits earned by the original equipment manufacturers (OEM) and the engineering, procurement and construction (EPC) contractors?

- TEG1 was procured under an OJEU/eTenders open competitive dialogue process.
- TEG2 was procured in line with the EirGrid, Electricity and Turf (Amendment) Act 2022, with bids reflective of cost and risk.

Do TEG units contribute to use of network charges or are network costs associated with TEG projects subsidised by other participants?

- The costs associated with the TEG are recovered via the DTUoS tariffs.

- The net SoS Programme costs are the total cost of the programme less any residual values that may be realised at the end of the respective contracts or any net market revenues the units may generate, if called on to provide services, which are returned to EirGrid for the benefit of the TUoS consumer.

What was the status of grid connections at TEG sites at the time of procurement? How will grid connections be treated after existing TEG agreements are expired?

- Different circumstances were in place for each of the sites.
- Each site is subject to a Grid Connection Agreement that expires with the TEG.

Has an impact analysis been carried out on the impact of TEG on Capacity Market delivery costs and timelines, and can this be shared with the industry participants?

- TEG is not considered in determining the capacity to be procured in the Capacity Market.

Can the CRU or the SEMC provide details on when existing TEG units will be closed down or have agreements terminated?

- As indicated in section 5.2.2.1 of the BMPS Version 8:
    - The TEG 1 units have an initial service period of 36 months from service commencement, with an option for EirGrid to extend the arrangement by up to two additional periods of 12 months each (3+1+1 years). The first of these units became operational and commenced service at the end of 2023.
    - The TEG 2 units fall under the EirGrid, Electricity and Turf (Amendment) Act 2022 which allows for an initial services period up to 31 March 2027 with the option, to extend to no later than 31 March 2028, subject to order of the Minister.

Abbreviations

ASP	Administered Scarcity Pricing
BM	Balancing Market
BMPS	Balancing Market Principles Statement
COD	Commercial Offer Data
CRU	Commission for Regulation of Utilities
DSU	Demand Side Unit
EA	Emergency Assistance
EI	Emergency Instruction
EU	European Union
ESBN	ESB Networks
EWIC	East West Interconnector
FPN	Final Physical Notification
MDC	Mandatory Demand Reduction
MMS	Market Management System
MOUG	Market Operator User Group
NCC	National Control Centre (TSO - EirGrid)
NDCC	National Distribution Control Centre (DSO – ESB Networks)
NIV	Net Imbalance Volumes
OEM	Original Equipment Manufacturer
PSECP	Power System Emergency Communications Plan
REMIT	Regulation on Wholesale Energy Market Integrity and Transparency
RPP	Risk Preparedness Plan
SEM	Single Electricity Market
SEMC	Single Electricity Market Committee
SoS	Security of Supply
TEG	Temporary Emergency Generation
TOD	Technical Offer Data
VDR	Voluntary Demand Reduction
VoLL	Value of Lost Load