

## Clean Energy Package: Risk preparedness fully supported by ENTSO-E

- ENTSO-E fully supports the EC's risk preparedness proposals repelling Directive 2005/89/EC. Getting prepared for risks to the power system has always been a key concern for TSOs as the energy transition requires efficient and effective cooperation across neighbouring countries. Europe's TSOs have strong and binding cooperation among each other, but close cooperation among EU Member States is key to assess and prepare for different risks and crisis situations.
- Risks to power systems can have a local, regional or pan-European scope. Local disturbances may spread rapidly across borders if not properly managed in a coordinated way. This requires preparations for coordinated action on international level, depending on the specific situation. Therefore, national and European risk preparedness processes have to build upon and complement each other.
- ENTSO-E welcomes the proposal to govern the necessary coordination within the Electricity Coordination Group (ECG). The ECG brings Member States and competent authorities together in order to decide on common measures and processes to prepare for risks to the power system.
- Switzerland – at the heart of the Continental European power system – and Norway with its strong integration into the Nordic, Continental and increasingly UK power systems, play a major role in crisis preparation and management for the respective systems. Art. 18 therefore needs to extend beyond the Energy Community and guarantee the participation of Norway and Switzerland in risk preparation, on equal footing with EU Member States.
- Although ENTSO-E fully supports principles of transparency, in the context of risk preparedness there is a need to protect critical data (e.g., in the event of cyber security and potential malicious acts). Therefore, transparency obligations should consider the need to protect critical infrastructure.
- The Regulation should ensure that TSOs' costs related to risk preparation and to ensuring security of supply are recovered from national tariffs. The Electricity Security of Supply Regulation 2005/89/EC, which will be replaced by the Clean Energy Package, provided for such a framework, which should be maintained.
- Finally, from a practical point of view, some of the proposed timelines for implementation seem unrealistically ambitious and should be reconsidered.

*Getting prepared for risks is a key concern for TSOs*

*Seamless cooperation between national and pan-European risk preparedness*

*The ECG is the appropriate governance structure.*

*Norway and Switzerland should be allowed to participate*

*Cybersecurity and prevention against malicious acts call for protection of critical data*

*Costs of risk preparedness to be covered by tariffs*

*Some implementation timelines are too tight*