

ENTSO-E consultation on the ICS methodology update

A Eurelectric consultation response paper

November 2025

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Markets & Investments Committee
WG Wholesale Market Design & Investment
Frameworks

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Organisation kind:

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4 Name of organisation

Organisation:

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No

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Comments on the ICS Methodology

9 Upload your responses

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10 Comments on Chapter 1 Introduction

Comments on Chapter 1 Introduction:

11 Comments on Chapter 2 Definitions

Comments on Chapter 2 Definitions:

12 Comments on Chapter 3 The Incident Classification Scale

Comments on Chapter 4 the Incident Classification Scale:

13 Comments on Chapter 4 General Provisions

Comments on Chapter 4 General provisions:

14 Comments on Chapter 5 Definitions of ICS criteria

Chapter 5 ICS criteria:

15 Comments on Chapter 6 Operational security indicators

Comments on Chapter 6 Operational security indicators:

16 Comments on Chapter 7 Procedure for the investigation of scale 2 and scale 3 incidents

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Effective responses to major system disruptions require getting both real-time management and post-event analysis right. This is why governance and transparency are critical. Governance ensures that roles and responsibilities are clearly and fairly allocated after an incident. Transparency is equally vital before, during and after disruption. Timely and open communication is essential to limit the impact and coordinate responses.

The Iberian blackout revealed a fundamental weakness in how system operation and incident investigation are governed in Europe. It also exposed serious weaknesses in how information was shared, both within the electricity system and with external stakeholders (industries, population, etc.). Delays in disclosing data and the lack of transparency months after the event highlight that openness is still not a default approach.

The most urgent lesson is the need to separate operational responsibilities from investigative authority. It is not appropriate for a stakeholder to take part in investigations of incidents in which it may directly or indirectly be involved, as it happened in the Iberian case, since this raises clear concerns about impartiality and possible conflicts of interest. The appropriate safeguards should therefore be put transparently in place to avoid any protection of vested interests.

Furthermore, the electricity system involves many actors such as system operators, market participants, regulators, security services and requires clearly defined roles, communication protocols, data transparency, and coordinated response. Inadequate information sharing can compromise stability, especially during crises that require swift decisions. Transparency must also extend to other sectors. This requires predefined protocols, regular crisis simulations and cross-sectoral access to relevant (sometimes classified) information.

Eurelectric recommendations:

1) To protect the integrity of future investigations, the following amendment to the ISC Methodology are essential:

- o Establish independent panels for incident analysis with independent experts, where the parties concerned do not conduct the investigation but participate and provide all necessary data without delays.

- o Ensure clear separation between operational, regulatory and analytical bodies.

- o Guarantee appropriate data transparency and access to key findings, enabling accountability and peer review.

2) More broadly, a coherent and revised governance framework is essential to enable effective cross-sectoral information sharing and protect sensitive data, especially given existing structural challenges within governments. This review must critically assess current oversight mechanisms and avoid giving entities that could have contributed to the problem a central role in the governance to ensure an efficient and secure energy system.

17 Comments on Chapter 8 Annual report

Comments on Chapter 8 Annual report:

18 Comments on the Annexes

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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