European Network of Transmission System Operators for Electricity

entsoe

RESPONSE TO COMMENTS RECEIVED FOR THE 'PUBLIC CONSULTATION OF PROPOSED ICS METHODOLOGY UPDATE' (2025)

15 December 2025

Period of consultation: 13 October – 13 November 2025
Consultation available online at
https://consultations.entsoe.eu/system-operations/2025-proposed-ics-methodology-update/

From: Working Group Incident Classification Scale

ENTSO-E Mission Statement

Who we are

ENTSO-E, the European Network of Transmission System Operators for Electricity, is the association for the cooperation of the European transmission system operators (TSOs). The 39 member TSOs, representing 35 countries, are responsible for the secure and coordinated operation of Europe's electricity system, the largest interconnected electrical grid in the world. In addition to its core, historical role in technical cooperation, ENTSO-E is also the common voice of TSOs.

ENTSO-E brings together the unique expertise of TSOs for the benefit of European citizens by keeping the lights on, enabling the energy transition, and promoting the completion and optimal functioning of the internal electricity market, including via the fulfilment of the mandates given to ENTSO-E based on EU legislation.

Our mission

ENTSO-E and its members, as the European TSO community, fulfil a common mission: Ensuring the security of the inter-connected power system in all time frames at pan-European level and the optimal functioning and development of the European interconnected electricity markets, while enabling the integration of electricity generated from renewable energy sources and of emerging technologies.

Our vision

ENTSO-E plays a central role in enabling Europe to become the first climate-neutral continent by 2050 by creating a system that is secure, sustainable and affordable, and that integrates the expected amount of renewable energy, thereby offering an essential contribution to the European Green Deal. This endeavour requires sector integration and close cooperation among all actors.

Europe is moving towards a sustainable, digitalised, integrated and electrified energy system with a combination of centralised and distributed resources. ENTSO-E acts to ensure that this energy system keeps consumers at its centre and is operated and developed with climate objectives and social welfare in mind.

ENTSO-E is committed to use its unique expertise and system-wide view – supported by a responsibility to maintain the system's security – to deliver a comprehensive roadmap of how a climate-neutral Europe looks.

Our values

ENTSO-E acts in solidarity as a community of TSOs united by a shared responsibility.

As the professional association of independent and neutral regulated entities acting under a clear legal mandate, ENTSO-E serves the interests of society by optimising social welfare in its dimensions of safety, economy, environment, and performance.

ENTSO-E is committed to working with the highest technical rigour as well as developing sustainable and innovative responses to prepare for the future and overcoming the challenges of keeping the power system secure in a climate-neutral Europe. In all its activities, ENTSO-E acts with transparency and in a trustworthy dialogue with legislative and regulatory decision makers and stakeholders.

Our contributions

ENTSO-E supports the cooperation among its members at European and regional levels. Over the past decades, TSOs have undertaken initiatives to increase their cooperation in network planning, operation and market integration, thereby successfully contributing to meeting EU climate and energy targets.

To carry out its legally mandated tasks, ENTSO-E's key responsibilities include the following:

› Development and implementation of standards, network codes, platforms and tools to ensure secure system and market operation as well as integration of renewable energy;

› Assessment of the adequacy of the system in different timeframes;

› Coordination of the planning and development of infrastructures at the European level (Ten-Year Network Development Plans, TYNDPs);

› Coordination of research, development and innovation activities of TSOs;

› Development of platforms to enable the transparent sharing of data with market participants.

ENTSO-E supports its members in the implementation and monitoring of the agreed common rules.

ENTSO-E is the common voice of European TSOs and provides expert contributions and a constructive view to energy debates to support policymakers in making informed decisions.

Executive Summary

The Public Consultation received responses from the public consultation on the proposed ICS Methodology update and were subsequently addressed by Working Group Incident Classification Scale (WG ICS) to be submitted for final approval by the System Operations Committee for use as of 1 January 2026. The stakeholders that submitted their comments were Asociación de empresas de energía eléctrica (aelec), ASB group of companies, EDF, EU DSO Entity and Eurelectric.

Many comments specifically referred to the blackout in the Iberian Peninsula and the ongoing investigation of it. It should be noted that specific comments related to details of ongoing ICS Expert Panel investigations are out of scope the ICS methodology revision. All key information relevant for the investigation and findings are shared publicly on the ENTSO-E website.

Based on the received comments, the ICS Methodology was amended to emphasise the impartiality of the EP investigation as the Expert Panel (EP) shall work independently and without influence from other parties. Nevertheless, experts from the affected systems have significant knowledge of their system that cannot be replicated and are needed to provide data and contribute with their experience on the matter. Furthermore, it is important to remember that the objective of the Expert Panel investigation is to improve resilience of the power system and prevent further instances and not to allocate responsibility or liability to any party.

The ICS Methodology public consultation pointed out that the term "fully unbundled DSOs" was unnecessarily limiting the participation of DSOs. The term "unbundling" should be understood as referred to in Article 35 of Directive (EU) 2019/944 and the phrasing was amended accordingly. The participation of the EU DSO Entity ensures all DSOs are represented in the Expert Panel.

Comments generally welcomed the ICS criteria updates. The legal application of the ICSM was also commented on. It should be noted that the ICSM is applied within the scope of the SOGL and can only be enforced upon entities within the scope of SOGL.

The Working Group Incident Classification Scale wants to express a sincere gratitude towards the responders for their attentive review of the proposed ICS Methodology. The comments have helped to finalise the ICS Methodology to accommodate the evolving European electricity system. The ICS Methodology will be maintained and updated in the future to reflect new developments and requirements in the evolving power system.

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Glossary

AC	Alternating Current
ACER	European Union Agency for the Cooperation of Energy Regulators
CE	Continental Europe
EAS	ENTSO-E Awareness System
ENTSO-E	European Network of Transmission System Operators for Electricity
HVAC	High voltage alternating current
HVDC	High voltage direct current
ICS	Incident Classification Scale
ICSM	Incident Classification Scale Methodology
NRA	National Regulatory Authority
RIAR	Regional Incident and Analysis Reporting
RCC	Regional Coordination Centre
RfG	Regulation (EU) 2016/631
SOGL	Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation
SOC	System Operations Committee
TSO	Transmission System Operator
WG ICS	Working Group Incident Classification Scale

ICS Criteria

OB	Blackout
L	Incidents on load
F	Incidents leading to frequency degradation
G	Incidents on power generating facilities
ON	N and N-1 violations
RS	Separation from the grid
LT	Loss of tools, means and facilities
OV	Violation of standards on voltage
RRC	Reduction of reserve capacity

1. Introduction

The Incident Classification Scale (ICS) Methodology has originally been developed in accordance with Article 8(3) of Regulation (EC) No 714/2009 of the European Parliament and of the Council of 13 July 2009, which has since been replaced by Article 30 of Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast). Article 30(1)(i) of Regulation (EU) 2019/943 sets the obligation for ENTSO-E to adopt a common incident classification scale.

The current ICS Methodology in use was approved by the ENTSO-E System Operations Committee on 4 December 2019 (link). The proposed ICS methodology has been in preparations since 2022 to correct ambiguities and increase clarity in the reporting, the ICS Expert Panel process and its timings.

This report presents the received comments to the Public Consultation, the dedicated response to each of them, and how the final methodology for approval has been amended based on the comments in Chapter 2. Chapter 3 Conclusion summarises the comments.

2. Individual comments

This chapter presents all received comments to the public consultation. The received comments are presented by Chapter of the ICS Methodology. In case the comment is a general comment relevant to the proposed methodology as whole, the question and response is listed in Section '*All other comments*'. The responding Working Group (WG) is WG Incident Classification Scale (WG ICS).

Question 1: Comments on Chapter 1 Introduction

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
AELEC-1	Asociación de empresas de energía eléctrica (AELEC)	General	Process-wise, we recommend that this methodology be subject to ACER´s opinion before final approval, after sharing and discussing relevant comments received during the consultation process with ACER; not only regarding the role of RCC as per ACER´s Decision on RCC Post-Operation and Post-Disturbances Analysis and Reporting Methodology. This would allow a more cohesive and inclusive regulatory process.	Rejected	The proposed ICS methodology has been shared with ACER for their review throughout the update process. The feedback received has been valuable and constructive towards this proposed methodology update.
ASB-1	ASB group of companies	General	Purpose is to align ICS with SOGL Article 15 and ensure consistent reporting across Europe. Comment: The principles are reasonable, but compliance depends entirely on TSOs providing data, which is still inconsistent.	Partially accepted	Please note that data provision obligations included in the ICS methodology, including the obligation to provide the data, are legally binding for the TSOs that apply the ICS methodology.
EDF-1	EDF	General	EDF welcomes this ENTSO-E consultation on its ICS methodology and the efforts developed to provide more clarity in the text. EDF supports the updates taking into account recent experience in the matter and believes that in some ways the methodology could be more demanding. EDF understands this version intends to put an emphasis on the violation of various operational limits.	Accepted	Thank you for your endorsement on the proposed updates.
EUDSO-1	EU DSO Entity	Clarification	As the document is about investigations as well as classification, some text about this should be added. Suggest new final paragraph: "The Methodology also defines the investigations which need to be made into Scale 2 and Scale 3 incidents, covering initiation, convening, membership, objectives and reporting.	Accepted	Added new paragraph as second last paragraph in the introduction Chapter: *"The Methodology also lays out the procedure for the investigation incidents on scale 2 and 3, covering initiation, establishment, objectives and deliverables of the ICS Expert Panel for the investigation to prevent future incidents and the improvement of the resilience of the European electricity system."*
EUDSO-2	EU DSO Entity	Editorial	TSO in the last line should be plural. "….describe the real-time situation of the TSO's' systems"	Accepted	Proposal incorporated.

Question 2: Comments on Chapter 2 Definitions

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-2	ASB group of companies	General	Purpose is to align ICS with SOGL Article 15 and ensure consistent reporting across Europe. Comment: The principles are reasonable, but compliance depends entirely on TSOs providing data, which is still inconsistent.	Partially accepted *(Duplicate)*	See response to comment ASB-1.
EUDSO-3	EU DSO Entity	Clarification	Is a WG ICS a standing group, or is a WG created for each investigation? From section 5.5 it seems that it's a standing group, whereas the definition implies it's a convened group per incident. It is not clear when the WG ICS is in charge and when the expert panel is in action. How is the WG ICS composed? Please clarify in the definitions.	Accepted	Working Group ICS is a standing group within ENTSO-E and works under the System Operations Committee. Without going too much into details on the group's tasks (as they are detailed in Chapters 7 and 8 of the ICS Methodology), we have reworded the definition for WG ICS to: "*'WG ICS' means the group formed by ENTSO-E for the purposes of this Methodology, and responsible to perform the tasks specified for the group as described in Chapters 7 and 8.*" WG ICS is composed of a TSO nominated Convenor (2-year long mandate, maximum two succeeding mandates) nominated TSO Members (minimum 8) and RCC Members (minimum 3) and one Advisor from the ENTSO-E Secretariat.

Question 3: Comments on Chapter 3 The Incident Classification Scale

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
AELEC-2	Asociación de empresas de energía eléctrica (AELEC)	Technical	**Chapter 3** On one hand, the SO GL defines the "alert state" as "the system state in which the system is within operational security limits, but a contingency from the contingency list has been detected and, in case of its occurrence, the available remedial actions are not sufficient to keep the normal state" (cf. Art. 3.2, definition 17). Coherently, chapter 3 of the current ICS methodology and the proposed one reads: "Scale 1 for significant incidents; violation of operational security limit; the system is in alert state; " On the other hand, Spain's national framework, as defined in Procedimiento de Operación 8.2 (2006), similarly defines the alert state as one intended to either restore the normal state or mitigate the consequences of an unfavorable evolution of the system toward emergency or restoration—particularly in the case of a widespread or large-scale incident. To this end, the system operator implements a safeguard plan with corrective and preventive measures, including, for example, the additional scheduling of generators via redispatching after the day-ahead market. According to current ICS methodology and the new proposal, incidents classified as Scale 1 align with the alert state as defined in Spanish regulation in force. In this context, we believe that extraordinary operational practices such as those currently in place in Spain should be acknowledged within the ICS framework under scale 1. Otherwise, there is a risk of accepting a level of discretion in system operator actions under the "normal state" that diverges from the intent of the SO GL. To reinforce this practice, chapter 3 of the ICS methodology should read as follows: "Scale 1 for significant incidents; violation of operational security limit; the system is in alert state according to SO GL AND/OR NATIONAL REGULATION IN FORCE;"	Partially accepted	We noted that the wording for scale 1 has been inaccurate as violating an operational security limit would indicate the system to be in emergency state. The text in paragraph 1 and the list below it has been reworded to correct the inaccuracy. Please note that Chapter 3 aims to keep a general tone of the definitions while Chapter 5 goes into the details (including exceptions when, for example, the N-1 criterion does not need to be fulfilled pursuant to Article 35(5) of the SOGL). SOGL is a European Regulation that takes precedence over national law. This means that the definition of alert state for the reporting of incidents according to the ICS Methodology should be the one that is established in SOGL. According to Art.20(1) of SOGL, each TSO shall be responsible to design, prepare and activate the remedial actions required to keep the system in the normal state. Therefore, the definition of Scale 1 incidents, for the purposes of applying the ICS Methodology, cannot be left at national discretion, as this would imply that each TSO could report under a different criteria. This would lead to significant differences in numbers that would affect the validity and added value of conclusions derived from data in the final ICS report.

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
AELEC-3	Asociación de empresas de energía eléctrica (AELEC)	Technical	**Section 3.1** Chapter 3.1 should be reworded to guarantee that ENTSO-E Awareness System (EAS) is part of an incident investigation in its full extent: "As the EAS is used in real-time, the system state is determined using only the information available at the time AND SHALL BE PUBLICLY AVAILABLE. Under certain circumstances, this can result in discrepancies between the system state declared in EAS and the factual classification of an incident during the TSOs' reporting. THE POTENTIAL DISCREPANCY SHALL BE DULY EXPLAINED IN THE FACTUAL REPORT AND SHALL BE THE STARTING POINT OF THE INVESTIGATION, TOGETHER WITH THE INVESTIGATION OF SIMILAR EVENTS OCCURRED IN THE PAST THAT DID NOT LEAD TO AN EVENT OF SCALE 0, 1, 2 OR 3." During this investigation process of the Iberian black-out, some Spanish agents requested the "power system state estimator" at the moment of the incident, and REE has denied this data arguing confidentiality reasons. Moreover, there is no guarantee the EAS is taken into account during the investigation to asses the real TSO awareness of the circumstances of the incident and similar ones that occurred in the past.	Rejected	EAS was created to exchange information between TSOs to increase operational coordination (pursuant to Article 30(1)(i)(i) of the Commission Regulation 2019/943) in case of incidents, with the main objective of avoiding the incident could extend to neighbouring TSOs. The EAS *data streams* (realtime operational system state information) are restricted to TSOs and authorized stakeholders for security reasons. Therefore, it is not possible to make this information public. The Expert Panel reports provide information on the EAS system states and the ICS chapter describes the violated ICS criteria, that is, the actual system states. Please note that specific comments related to details of ongoing ICS Expert Panel investigations are out of scope the ICS methodology revision.
ASB-3	ASB group of companies	General	ICS scales (Below, 0, 1, 2, 3) tied to system states (normal → blackout). Comment: The scale structure is mature and unchanged, but practical classification still suffers from post-event disagreement among TSOs due to missing synchronized datasets, especially for multi-TSO incidents.	Rejected	It is unclear what datasets are referred to in the comment. Nevertheless, the datasets received from TSOs are timestamped. In case of unclarities when classifying incidents, additional data can be requested and/or WG ICS convenes to resolve the unclarity based on the ICS Methodology. These discussions help to identify gaps in the methodology and lead to update proposals.
EUDSO-4	EU DSO Entity	Clarification	**Chapter 3, paragraph 1** The sentence about severity level being defined with the SOGL Art 18 system states is hard to understand. What is the linkage between the scales of the methodology and the system states?	Accepted	Paragraph simplified and a remark added that the ICS criteria are described in detail in Chapter 5 (in case it was implied Chapter 3 had detailed content) to avoid confusion. The list of scales below the paragraph aims to match each scale to the corresponding system state (below scale and scale 0 → normal state, scale 1 → alert state, scale 2 → emergency state and scale 3 → blackout state). To improve clarity, the paragraph was reworded to "*The Incident Classification Scale (ICS) consists of five (5) scales (below scale, scale 0, 1, 2 and 3) ranging from minor incidents to major incidents. The scales are defined within the meaning of the system states in Article 18 of the SOGL. The scales and criteria are described in detail in Chapter 5. In general, the scales and corresponding system states are:*" Furthermore, an additional descriptive paragraph was added below the list of scales and corresponding system states to describe that each scale has a set of ICS criteria: "*Each scale has a set of ICS criteria that define operational thresholds on, for example, frequency and voltage, that must be met or the ICS criteria is violated and the system state changed accordingly. Furthermore, each ICS criterion has a priority as shown in Table 1 […]*".
EUDSO-5	EU DSO Entity	Editorial	**Chapter 3, paragraph 2** There are two references to there being 30 criteria, but the table has 31.	Accepted	Corrected

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
EUDSO-6	EU DSO Entity	Editorial	**Chapter 3, paragraph 2** Editorial problem – broken hyperlink.	Accepted	Hyperlink fixed.

Question 4: Comments on Chapter 4 General Provisions

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-4	ASB group of companies	General	Defines roles of TSO SPOCs and reporting timelines. Comment: The SPOC model is good, but the methodology assumes TSOs are willing to share accurate data on time, which is often not the case. The gap is not design — it is cooperation.	Partially accepted	Please note that data provision obligations included in the ICS methodology, including the obligation to provide the data, are legally binding for the TSOs that o apply the ICS methodology.
EDF-2	EDF	General	EDF welcomes the introduction of the minor incidents' scale. Reporting on this can contribute to a better anticipation and identification of certain types of risks due to their recurrence in a minor mode for example.	Accepted	Thank you for your endorsement on the proposed updates.
EUDSO-7	EU DSO Entity	Clarification	**Chapter 4, point 1b** This requirement is not unambiguous. What are the criteria for "maintaining operational security"?	Accepted	The criteria for "maintaining operational security" is set by the TSOs. Nevertheless, the assets that fall under this criteria are included in the contingency list and are included in, for example, security analyses and capacity calculations.

Question 5: Comments on Chapter 5 Definitions of ICS criteria

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-5	ASB group of companies	General	ICS Criteria (OB, L, F, T, G, ON, RS, LT, OV, RRC) Thresholds for incident metrics. Comment: • Thresholds are well-structured and aligned with SOGL. • However, many TSOs still lack standardized measurement granularity, especially for: • HVDC flow deviations (T) • Dynamic frequency response (F) • Reserve reduction measurement (RRC) This results in incomplete or incompatible reporting between control areas. The emergency and alert states are not the problem — the real problem is the validity and completeness of data feeding the ICS criteria.	Partially accepted	Unexpected flow changes are monitored by TSOs constantly. Sub-second flow measurements are reserved for incident analysis, while the monitoring of unexpected changes and outages is sufficient to identify T incidents based on the proposed ICS criteria. The F incidents monitor frequency degradation by measuring frequency deviations from the 50 Hz value. To identify incidents on frequency degradation (F), the Synchronous Area Monitors (SAMs) use 1-second resolution data that fits well within then requirements for the F criterion. Incidents or reduction of reserves (RRC) are related to unexpected outages of facilities that provide reserves to the power system. This information is based on unavailability information that TSOs receive in real-time. The completeness and validity of data feeding into the ICS classification is of high importance. In case inconsistencies are detected, they are followed up and corrected to ensure the classification is accurate.

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
EDF-3	EDF	General	Regarding incidents on load, EDF supports the additional criteria (less than 5% of the pre-incident load) so as to bring light only on relevant incidents. Regarding incidents leading to frequency degradation, EDF supports the removal "of the upper frequency threshold limits" which eliminates loopholes that previously allowed some situations not to be considered as incidents, even though they should have been. Regarding incidents on network elements, EDF welcomes the inclusion of considerations related to HVDC lines, thus taking into account recent experience on Nordlink failures and other HVDC lines. Regarding the loss of tools, means and facilities, EDF welcomes the complementary elements introduced. Regarding the violation of standards on voltage, EDF supports the removal of the upper (or lower depending on the criterion) voltage threshold limits, as it eliminates loopholes similar to those in the frequency deviations criteria.	Accepted	Thank you for your endorsement on the proposed updates.
EUDSO-08	EU DSO Entity	Clarification	**Section 5.1** Last paragraph on above "exceptions": the two bullets before that paragraph mention the respective "TSO's control area", the paragraph talks about "the TSO's electricity system" (as a whole?). **Proposal** Be consistent unless there is a reason for using the different terms- between "TSO's control area" vs. "the TSO's electricity system"	Accepted	In the scope of the blackout criteria, describing that the TSO's control area is in blackout state is not technically correct as the control area itself cannot be in blackout state as it is the transmission grid that is in a blackout state. Therefore, "electricity system" is better suited in this use-case.
EUDSO-09	EU DSO Entity	Clarification	**Section 5.2, paragraph 2** Why are only manual disconnections of load excepted? Is there not a case for excepting automatic load disconnections too?	Accepted	The automatic disconnections fall under the second point "activation of system defence plan measures")

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
EUDSO-10	EU DSO Entity	Technical	**Section 5.2, Table 2** The criterion for loss of load does not treat the effects of this sufficiently seriously A single TSO may lose 9% of its load but this could be 100% of a single DSO supplied by that TSO. In addition, the total demand to customers can be much greater than that supplied by the TSO, because of the contribution from DSO connected generation. This criterion risks understating the real effect on customers and the economy. **Proposal** Replace the criteria for the CE/IE/Nordic synchronous areas as below: Scale 0: ≤ 1% Scale 1: 1% - 5% Scale 2: >5%	Rejected	WG ICS wants to emphasise that the scaling of the thresholds have a regional aspect. Emergency state, or scale 2, is raised when the impact is regional, that is, impacting multiple TSOs. A 5% loss of load in one TSO's system is significant, however, not extensive enough to be regionally relevant. Incidents on load are operationally simpler to mitigate as generation is easier to reduce to balance the system. In contrast, load is not easier to reduce as this requires cutting the need for electricity for customers in cases where voluntary contracts for reducing consumption do not exist. With the above in mind, the scale thresholds for loss of load are adequate in our opinion.
EUDSO-11	EU DSO Entity	Clarification	**Section 5.3** In 5.3: "… were used for the Nordic scale 2 thresholds. For CE, the Frequency Containment Reserve (FCR) full activation time in Annex V of the SOGL was used for the scale 2 duration threshold."" Is the use of the past tense correct? Is this historic information or still valid? **Proposal:** Please clarify	Accepted	Corrected the tense from past to presence. To clarify, they were used in the past to decide the thresholds but are, of course, still today the basis for the thresholds.
EUDSO-12	EU DSO Entity	Clarification	**Section 5.4** What does the (T) mean in the title? **Proposal:** Please clarify	Accepted	The abbreviation in parenthesis is used as a short code for the relevant ICS criterion. Therefore, the T stands for "Incidents on network elements".
EUDSO-13	EU DSO Entity	Clarification	**Section 5.4** Why are transmission elements capable of automatic reconnection, but not reconnected after 3 minutes, excluded? **Proposal:** Please explain	Accepted	Referring to the second paragraph, "For transmission system element(s) not capable of automatic reconnection, disconnection is deemed to be final if reconnection has not occurred after 3 minutes.", it gives additional detail specifically about these types of transmission system elements. Transmission system elements capable of automatic reclosing is covered by the paragraph above "The disconnection is reported in the event of: […] - (automatic) disconnection by a protection device". Therefore, these are not excluded in the reporting. Nevertheless, there is an exception of no reporting "where successful automatic re-closure has occurred and no other ICS criteria threshold is reached" (see the "Exceptions" part four paragraphs below in the proposed ICS methodology update).
EUDSO-14	EU DSO Entity	Editorial	**Section 5.4** Missing "a" … 220kV or higher and in a network with …	Accepted	Thank you for attentive review of the ICS methodology.

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
EUDSO-15	EU DSO Entity	Editorial	**Section 5.5, Table 6** first row, last cell has "Biggest" with capital B. Should be lower case to be correct and consistent.. **Proposal**: Please correct it	Accepted	Thank you for attentive review of the ICS methodology.

Question 6: Comments on Chapter 6 Operational security indicators

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-6	ASB group of companies	General	Indicators are calculated from the reported incidents. Comment: The quality of indicators directly depends on the input data, so operational security analysis becomes statistical but not diagnostic — useful for trends, not root causes.	Accepted	Thank you for your comment. We agree that data quality is directly dependent on the provided data. The ICS reports are useful for showing trends and also for TSOs and regulators to, for example, put in place measures and investments for ensuring operational security in the electricity system based on observations in the report.

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

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
AELEC-4	Asociación de empresas de energía eléctrica (AELEC)	General	General comment: The governance framework must be reviewed to ensure that investigations are conducted impartially and that information is communicated transparently. Clear governance structures and transparent information flows are essential before, during and after system disruptions. The separation between operational responsibility and investigative authority must be guaranteed to avoid conflicts of interest and ensure impartiality. Open communication and cross-sector coordination can significantly improve the effectiveness of crisis response and build trust across stakeholders. The fundamental objective of any blackout investigation should be the prevention of future occurrences. To this end, investigations must go beyond a mere description of the events to include analysis that facilitate the identification of the true root cause of the event. Furthermore, the investigative process shall remain entirely independent of legal or political considerations in order to safeguard its integrity and credibility. To ensure impartiality and avoid conflicts of interest, transmission system operators (TSOs), regulatory authorities, and governmental entities shall not assume leadership of blackout investigations. These inquiries must be entrusted to independent technical experts who possess no operational, regulatory or governmental responsibilities, thereby guaranteeing objectivity and reliability in the findings. In this regard, we welcome the proposal to include DSOs in the ICS Expert Panel and we advocate for their mandatory participation through their officially recognized associations (e.g., the EU DSO Entity). To protect the integrity of future investigations, the following actions are essential: • Establishing independent panels for incident analysis, without ties to the parties involved; independent experts, not related to any TSO, must be part of the independent expert panel and should be leading the investigation. • Affected TSOs should not be part of the Expert panel. • EU DSO Entity shall appoint a representation of unaffected DSO experts to the panel. • In the case that affected TSOs were to take part in the Expert panel, the rest of implicated parties must also take part (through proper representation of associations). In this case, the panel must include a representation of experts from the affected DSOs. • For all affected parties, including the affected TSOs, their role should be limited to providing data and they should not be involved in the analysis nor in the deliberation. • Ensuring clear separation between operational, regulatory and analytical bodies. • Guaranteeing appropriate data transparency and access to key findings, enabling accountability and peer review. • Public hearings and public consultations might contribute to providing additional information. More broadly, a coherent and revised governance framework is essential to enable effective cross-sectoral information sharing and protect sensitive data. This review must critically assess current oversight mechanisms and avoid involving entities that may be contributing to the problem to ensure an efficient and secure energy system. With the proposal as it is, potential conflicts of interest could arise, as for example, in the Iberian blackout investigation there is a potential conflict of interest with REE as a party potentially responsible for the blackout and, simultaneously, member of the Expert Panel. Lessons learnt from the Spanish blackout reinforce the following requests: • Affected TSOs should not be part of the Expert panel: REE shouldn't have participated either in the analysis information or in the subsequent deliberations regarding the investigation into the causes of the blackout. • Data transparency and access to key findings: Entsoe and REE have requested data to Spanish agents, and this has been provided by most of them; however, these Spanish agents requested the "power system state estimator" at the moment of the incident, and REE has denied this data arguing confidentiality reasons. However, forecasts of this information are published every hour to	Partially accepted	The investigation that is conducted by the EP is impartial as ACER, NRAs and RCCs are part of the EP and actively contribute to the analysis and investigation. The participation of NRAs and ACER ensures that regulatory bodies are represented. The participation of the affected TSOs in the EP is required as they provide information that is important for the investigation and contribute with their experience during the incident, something that other TSOs cannot do on their behalf. Furthermore, experts from the affected TSOs system have significant knowledge of the impacted system that cannot be replicated. The affected TSO is not responsible for conducting the investigation. Instead, they contribute by providing data and contributing with their experience on the matter. With regards to the participation of REE in the Expert Panel of the Iberian Peninsula blackout investigation, it has been subject to the independent character of the Panel, meaning that REE is not conducting the investigation nor deliberations of the EP. Unbundled DSOs and an EU DSO Entity representative were included in the proposal for the procedure of scale 2 and scale 3 incident investigations. All relevant information for an investigation should be provided by TSOs, DSOs, SGUs and third parties. In this sense, public hearings and public consultations would not provide added value or other relevant information, would be inefficient and would delay the investigation process. All key information relevant for the investigation and findings are shared publicly on the ENTSO-E website. Please note that specific comments related to details of ongoing ICS Expert Panel investigations are out of scope the ICS methodology revision.

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			analyze technical constraints, proving that this information is not confidential. The "power system state estimator" at the moment of the incident shall always be publicly available. This must be explicitly included in the ICS methodology as it is the starting point for any independent entity to analyze the incident.		
ASB-7	ASB group of companies	Technical	Defines Expert Panel process and reporting timeline (Factual in 6 months, Final in 12 months). Comment: This is structurally correct, but if core data is missing, the panel often reconstructs events from partial evidence, which leads to soft conclusions and no enforceable recommenfstuin I defined it clearly in post version response	Partially accepted	The proposed changes in the ICS Methodology aim to clarify the data collection process and ensure all data needed to enable a robust analysis of the incident and provide recommendations to prevent similar incidents from occurring in the future.
EDF-4	EDF	Technical	Regarding the investigations of an incident of scale 2 and 3 and the final reports to be delivered by the expert panel : though ENTSO-E rejects the purpose of attributing responsibilities after investigating an incident, it should be clear that any final report or investigation result should factually present an analysis of the root causes, including reported or detected violations. This is indeed very precisely the field of technical expertise of TSOs, as well as the field of data handled by TSOs. No one else has more means nor legitimacy than ENTSO-E to carry out and publish such investigation reports. The root causes and violation are indeed critical elements to be able to draw lessons and develop recommendations in order to prevent such incidents in the future but also for policy makers to be able to attribute responsibilities. Regarding the experts panel formation, EDF supports ENTSO-E's proposal to open the expert panel to an RCC representative, as well as to DSOs affected and to EU DSO whenever relevant, to participate to the investigation. EDF however considers the mention of considering only "fully unbundled DSOs" totally out of scope, in case of a technical investigation and calls for the deletion of this mention. What matters is the knowledge of the electrical system, the good cooperation between stakeholders and the will to collectively improve the safety of the European electrical system, nothing to do with unbundling. On the contrary, this would prevent necessary stakeholders' participation and in the end be detrimental to the improvement of the European electrical system. Furthermore, EDF even suggests opening the experts panel to any expert of a specific issue identified (ex. DSO having experience in a specific matter due to its experience but who is not an affected DSO). Regarding the timeline for the investigations, EDF supports the decorrelation of the publication of the final report of an incident from the regular annual ICS report publication. Regarding the 12 months period to present the final report, EDF considers that recommendations could be published as soon as possible on a case by case basis if essential to avoid any further potential incidents of the same type. Regarding data collection, data being critical to the analysis of root causes and violations, EDF is in favor of a more mandatory approach to data reporting from the various stakeholders involved. It is not admissible to refuse providing data or unduly delaying data transmission in case of an investigation. Financial penalties should be considered in case of no cooperation for data reporting in incident investigations (could be envisaged within the SOGL).	Accepted	We agree with the importance of identifying and analysing the root causes violations during an incident investigation. We propose to reflect this in point 7.6(1)(a) by adding identification into the sentence so that the ICS Final report shall include at least "*the identification and analysis on ~~on~~ of the causes of the incident;*". The term "unbundling" is understood as referred to in Article 35 of Directive (EU) 2019/944. This is of relevance when conducting a scale 2 or 3 incident investigation. Accordingly, the reference to "full unbundling" was removed and replaced with a reference to the need to comply with the article mentioned above. The participation of the EU DSO Entity ensures all DSOs are represented in the Expert Panel. The 12-month timeline to present the final report is a final deadline. If the report is completed ahead of the deadline, it will be published earlier. We agree with the mandatory approach for data reporting. However, since the ICSM is applied within the scope of the SOGL, we note that the data collection requirements can only be enforced upon entities within the scope of SOGL. We also agree that obligations related to data collection need to be enforced effectively. However, the ICSM cannot prescribe rules on enforcement. The imposition of effective, proportionate and dissuasive penalties is a matter reserved for national regulatory authorities, as follows from national implementation of Article 59(3)(d) of Directive 2019/944, as well as Article 66 of Regulation 2019/943. We have informed the SO guidelines group of experts know so this can be considered in the future.
EURELECTRIC-1	Eurelectric	Technical	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.	Accepted	We agree with your first remarks on the importance of governance and transparency in both real-time operations and post-incident investigation.

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
			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: • 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. • Ensure clear separation between operational, regulatory and analytical bodies. • 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.		The ICS Expert Panel is a collaboration between ACER, NRAs, RCCs, (impacted and not-impacted) TSOs and ENTSO-E for the investigation of scale 2 and 3 incidents, as prescribed by the ICSM. The impacted TSO is not conducting the investigation. Experts from the field are directly involved in the contents of the factual and final report. Please note that specific comments related to details of ongoing ICS Expert Panel investigations are out of scope the ICS methodology revision. The EP is independent and experts from the affected systems participating in the EP have significant knowledge of the impacted system that cannot be replicated. The affected parties are not responsible for conducting the investigation. Instead, they contribute by providing data and contributing with their experience on the matter. Separation of roles within the EP are implied from the entities the EP members come from. Based on your comment and the above, we have amended the first point in Chapter 7 to emphasise the impartiality of the EP investigation with the following "*The investigation shall be conducted impartially and should not intend to allocate responsibility or liability to any party.*" The main Information and findings have been shared publicly on the ENTSO-E website. For the blackout incident this year, a dedicated website was created to gather the most updated information in one place to promote transparency and ease-of-access.
EUDSO-16	EU DSO Entity	Technical	**Chapter 7, paragraph 2** Include "a representation of DSOs" **Proposal:** The report is prepared by an ICS Expert Panel consisting of: • representatives from each TSO affected by the incident, • the leader of the expert panel from a TSO not affected by the incident • representatives of affected DSOs, • representative(s) of unaffected DSOs • relevant RCC(s); and • a WG ICS representative.	Rejected	If the nature of the incident and its impact on the distribution grid is considered by the EP as significant or relevant for the investigation of the incident, DSOs and the EU DSO Entity will be invited to participate in the Expert Panel. The decision of inviting these entities is made by the EP Members, which include regulatory authorities.

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EUDSO-17	EU DSO Entity	Technical	**Section 7.1, paragraph 5** Include "DSOs" Add "e. affected DSOs."	**Rejected**	Including a list of affected DSOs is not relevant in the preliminary data to consider the regional impact of an incident when classifying an ICS incident. The preliminary data is intended to be as brief as possible to ensure classification can be done as fast as possible.
EUDSO-18	EU DSO Entity	Technical	Add affected DSO. **Proposal**: The report of the internal investigation shall be shared with ENTSO-E, the TSOs, affected DSOs, RCCs, ACER and the NRAs. The internal report shall follow the timeline set for the ICS Expert Panel reports.	Accepted	Accepted.
EUDSO-19	EU DSO Entity	Editorial	Typo "… meets any scale 2 ~~of~~ or scale 3 criteria…"	Accepted	Accepted
EUDSO-21	EU DSO Entity	Technical	It is not clear why the relevance of the requirement on DSO unbundling is. All DSOs have to conform to EU and national regulation regarding independence and equal treatment of all parties. Our suggested revised text (in comment No EUDSO-20) does not include this requirement as we believe it is inappropriate. According to Art 35 of the Directive (EU) 2019/944 DSOs have to be independent and follow the unbundling criteria foreseen in the article. If Member States treat electricity undertakings with less than 100 000 connected customers differently, the national law can introduce the additional safeguards (e.g., information unbundling in Germany). Therefore, it would restrict the requirements foreseen in EU law if the methodology has a restriction of "not unbundled DSOs". Additionally, such reference and wording is vague and could restrict affected DSOs from contributing to a secure, reliable and efficient electricity distribution system in its area.	Accepted	The term "unbundling" is understood as referred to in Article 35 of Directive (EU) 2019/944. Accordingly, the reference to "full unbundling" was removed and replaced with a reference to the need to comply with the article mentioned above. This is of relevance when conducting a scale 2 or 3 incident investigation. The participation of the EU DSO Entity ensures all DSOs are represented in the Expert Panel.
EUDSO-22	EU DSO Entity	Editorial	There is a typeset error between d, e. and f. **Proposal**: Remove "and" from the end of (d); replace the full stop at the end of (e) with a semicolon and add "and".	Accepted	Thank you for your attentive review of the proposed ICS Methodology.
AELEC-5	Asociación de empresas de energía eléctrica (AELEC)	Technical	Detailed comment 1 (chapter 7.4 - point 1): The input of affected stakeholders should be taken into account (i.e. DSOs, SGUs, etc.), particularly if they raise reasonable concerns over subjects that may not have been fully addressed by the analysis carried out by a TSO involved.	Accepted	Added the "TSOs, RCCs, DSOs, SGUs or third parties within the scope of SOGL" to point one similarly to as it is described in the other points in the same paragraph.
EUDSO-20	EU DSO Entity	Technical	**Section 7.2** DSOs must be involved Replace 1.f with: "Representatives from DSOs affected by scale 2 or scale 3 incidents which are included in Table 15, and representatives of DSOs not affected by the same incident. Representatives from unaffected DSOs will be appointed by the EU DSO Entity. In the event that there are a large number of affected DSOs, ENTSO-e and EU DSO Entity will agree the appropriate number of DSO representatives from each member state. The allocation of representatives	Rejected	If the nature of the incident and its impact on the distribution grid is considered by the EP as significant or relevant for the investigation of the incident, unbundled DSOs and the EU DSO Entity will be invited to participate in the Expert Panel. The decision of inviting these entities is made by the EP Members, which include regulatory authorities.

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			within the agreed members state shall be made by the EU DSO Entity. DSOs will not be automatically represented for incidents not included in Table 15." Table 15 – Subset of Table 1 for involvement of DSO experts included in ISC Scale 2 and Scale 3 Expert Panels. Scale 2 - Extensive Incident / Scale 3 – Major Incident #2 L2 / #1 OB3 #3 F2 (but only if the incident originates on a DSO system) #4 T2 #6 ON2 #8 OV2 #10 LT2		
AELEC-6	Asociación de empresas de energía eléctrica (AELEC)	Technical	Detailed comment 2 (chapter 7.4 - Point 7): Point 7 stablishes that "if, during the course of the investigation, additional information and/or data not specified in this methodology or requested by the Expert Panel, becomes available to the Panel, the Expert Panel shall assess its relevance to the investigation. If deemed relevant the Expert Panel shall consider it in preparing the factual and/or final reports". In our view, there should always be a written response with an explanation by the impartial expert panel to the sender of this additional data in case the impartial expert panel does not take into account this information.	Rejected	Mandating such a response opens up the risk of the ICS Expert Panel investigation being inundated with irrelevant data for the investigation with the requirement to respond to each individual information provider.
EUDSO-23	EU DSO Entity	Editorial	The panel should request the data directly to the interested parties. "In case the ICS Expert Panel requires additional data and information for the investigation, the ICS Expert Panel shall directly request this additional data from the relevant TSOs, RCCs, DSOs, SGUs or third parties within the scope of SOGL with a written request. The data that can be requested by the ICS Expert Panel are listed in Annex I and II."	Accepted	Accepted, but with a minor change: "*the ICS Expert Panel shall request this additional data directly from the relevant*"
AELEC-7	Asociación de empresas de energía eléctrica (AELEC)	Technical	Detailed comment 3 (chapter 7.5 - point 2): If, between the occurrence of the incident and the publication of the factual report, the involved TSO issues its own report and any element contained therein is not reflected in the factual report, the Expert panel shall provide an explanation for such omission. For instance, in the case of the Iberian blackout, Red Eléctrica's national report explicitly addressed the sharp voltage variations caused by renewable generation participating in the intraday market. However, ENTSO-E's factual report did not consider the voltage impact of renewable generation trading in the intraday market, focusing instead solely on the effect of countertrading measures implemented at the France–Spain interconnection to mitigate oscillations affecting secondary control activation.	Rejected	It is not the responsibility of the ICS EP to make comments on the analysis that a TSO (or any other party) may have carried out or published at national level.
AELEC-8	Asociación de empresas de energía eléctrica (AELEC)	Technical	Detailed comment 4 (chapter 7.5 - point 3): Point 3 establishes that "3. The Factual Report is for internal use of the ICS Expert Panel and provides a base for the remaining investigation and the Final Report". In our view, the factual report should be publicly available.	Accepted	All ICS Factual Reports for past incidents have been published without a legal mandate in place for that. In regards to that, we propose an added change to change the words "prepare" in Section 7.3 points 1(i) and 1(ii) to "publish" and delete paragraph 7.5(3) as it becomes obsolete.

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
					7.3(i) becomes *"[…] the ICS Expert Panel shall publish an ICS Factual Report […]"* And 7.3(ii) becomes *"[…] the ICS Expert Panel shall publish an ICS Final Report […]"*
AELEC-9	Asociación de empresas de energía eléctrica (AELEC)	Technical	Detailed comment 5 (chapter 7.6 - point 1.f): To ensure the implementation of best practices, if the involved TSO has introduced a regulatory proposal or adopted a regulation that deviates from the standard practices within ENTSO-E, the Expert Panel shall evaluate the effectiveness and justification of that measure. For example, what impact could the exception of using an operational voltage threshold of 435 kV instead of 420 kV have had in the Iberian blackout case?	Partially accepted	The relevant purpose of the Expert Panel investigation is to conclude and explain the reasons for the incident, and make recommendation based on the conclusions of the investigations in order to avoid similar incidents in the future. For this reason, the relevant facts and conditions are those which applied at the time of the incident. The independent Expert Panel is free to include in the Final Report any recommendation that may avoid a similar incident from happening in the future. However, The implementation of these recommendations is outside the scope of the ICS Expert Panel investigation and follows as the next step after the investigation is concluded. Any request for the review of applicable national or EU law is out of the scope of this consultation and should be made to the corresponding authority.
EUDSO-24	EU DSO Entity	Technical	In 7.6 there is no explicit provision on who shall have access to the ICS Final Report. We suggest that there is a new 7.6, point 2 added, which explicitly details which organisations receive copies of ICS Final Report. 7.2.2 The final shall be published on ENTSO-e's website and shall be distributed directly to: • All TSOs; • NRAs; • ACER; • All affected DSOs; • EU DSO Entity; and • relevant RCC(s).	Rejected	The final (and factual) reports are publicly available for any interested party to read. Maintaining an email list to all DSOs in case of them being impacted is not the responsibility of the ICS Expert Panel (or ENTSO-E if this obligation is given to ENTSO-E). Nevertheless, we will communicate the publishing of these reports with our stakeholders via the communication channels we maintain normally.

Question 8: Comments on Chapter 8 Annual report

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-8	ASB group of companies	General	TSOs must submit all data by fixed quarterly and yearly deadlines. Comment: The timeline is fine, but the methodology contains no enforcement or escalation mechanism when TSOs delay, omit, or alter data. Thus: ICS remains formally correct, but practically voluntary.	Accepted	See response to comment ASB-1.

Question 9: Comments on the Annexes

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
EUDSO-25	EU DSO Entity	Editorial	Table 15 needs to be renumbered as Table 16.	Rejected	Renumbering of tables is not needed because proposal in comment EUDSO-20 was rejected.

All other comments

Comment ID	Commenter	Type of comment *(Clarification / General / Technical / Editorial)*	Comment	Accepted/ Rejected	Response from the Working Group (WG)
ASB-9	ASB group of companies	General	This proposed update does not substantially change the ICS logic. It mainly clarifies thresholds, improves definitions, and tries to align reporting rules with SOGL and RIAR processes. But the same old problem remains: the methodology assumes timely, high-quality, harmonized data from TSOs — which rarely happens in practice. So the methodology is correct on paper, but application is weak where cooperation and data completeness fail.	Partially accepted	See response to comment ASB-1.

3. Conclusions

Five stakeholders submitted their response to the Public Consultation hub on the proposed ICS Methodology update and were subsequently addressed by Working Group Incident Classification Scale (WG ICS) to be submitted for final approval by the System Operations Committee for use as of 1 January 2026. The stakeholders that submitted their comments were Asociación de empresas de energía eléctrica (aelec), ASB group of companies, EDF, EU DSO Entity and Eurelectric.

The chapter that received most comments (18 comments out of 47) was Chapter 7, which describes the procedure to investigate scale 2 and 3 incidents. Many of those comments referred to the blackout in the Iberian Peninsula and the ongoing investigation. It should be noted that specific comments related to details of ongoing ICS Expert Panel (EP) investigations are out of scope the ICS methodology revision. All key information relevant for the investigation and findings are shared publicly on the ENTSO-E website.

Furthermore, concerns were raised about the governance, transparency and impartiality of the ICS Expert panel during incident investigations. WG ICS agreed on the importance of governance and transparency in both real-time operations and post-incident investigation. Based on the comments, the ICS Methodology was amended to emphasise the impartiality of the EP investigation. WG ICS also agrees that the Expert Panel (EP) shall work independently and without influence from other parties. Nevertheless, experts from the affected systems participating in the EP have significant knowledge of the impacted system that cannot be replicated. The affected parties are not responsible for conducting the investigation. Instead, they contribute by providing data and contributing with their experience on the matter.

The remarks from the ICS Methodology public consultation pointed on that the term "fully unbundled DSOs" was unnecessarily limiting the participation of DSOs. The term "unbundling" should be understood as referred to in Article 35 of Directive (EU) 2019/944. Accordingly, the reference to "fully unbundled" was removed and the paragraph was rephrased. It should be noted that the participation of the EU DSO Entity ensures all DSOs are represented in the Expert Panel.

Furthermore, many comments were of general nature or requested clarifications. These were accepted and the methodology amended accordingly or clarified in the response in this document. The legal application of the ICSM was also commented on, specifically in relation to the data collection during ICS Expert Panel investigations. It should be noted that the ICSM is applied within the scope of the SOGL and can only be enforced upon entities within the scope of SOGL.

Comments were in general welcoming to the ICS criteria updates. One comment worth noting came from the EU DSO Entity on the thresholds for the loss of load (L) criteria. WG ICS wants to emphasise that the scaling of the thresholds have a regional aspect. Emergency state, or scale 2, is raised when the impact is regional, that is, impacting multiple TSOs. A 5% loss of load in one TSO's system is significant, however, not extensive enough to be regionally relevant.

The Working Group Incident Classification Scale wants to express a sincere gratitude towards the responders for their attentive review of the proposed ICS Methodology. The comments have helped to finalise the ICS Methodology to accommodate the evolving European electricity system. Nevertheless, the methodology will need to be updated for the future to, for example, include a criteria for classifying oscillations in the power system. This need must be assessed thoroughly before being implemented into the ICS Methodology.