IFIEC STATEMENT

Industrial installations are operated with regard to the needs of their respective product markets. Short-term changes in maintenance planning occur very often, e.g. when a planned maintenance needs to be delayed or advanced for a few days or weeks for production reasons. In such a case it is important that short-term changes in the maintenance planning of an industrial production unit are not impeded by an inflexible long-term outage planning process. Therefore the outage planning and updating process laid down in this Network Code must allow for such short-term changes.
A situation needs to be avoided in which the TSO rejects such a change request. Such a rejection must only be possible as a measure of last resort.
IFIEC proposes that any change request initiated by the operator of a demand facility or a power plant directly associated with an industrial production process shall be accommodated during the coordination procedure foreseen in article 41/2/c. The requesting party shall demonstrate that the request is motivated by external factors such as changes in the economic situation or unforeseen events influencing industrial production.

Further remarks on the draft network code:

- IFIEC would like to highlight the importance of energy intensive industry with regard to operational planning and scheduling. Industrial users can play an important role in helping to maintain system security, by contributing with flexible loads and flexible industrial power plants (self generation). However, IFIEC prefers voluntary and market based solutions to make use of such flexibilities. Market based and incentive-oriented mechanisms should be implemented with priority over administered and - in the end – forced mechanisms. Therefore, any voluntary agreement and coordination is preferred.

- With regard to planned outages, grid-models and scenarios we would like to stress that cooperation and consultation must take into account a proper timeframe. Industrial users have their own long term outage planning for maintanance and for example overhauls. When taking into account a proper timeframe it can be prevented that there are incompatibilities. Timely requests for information and proper consultation with network users is of utmost importance.

- IFIEC also is concerned with the definition that is used for *significant grid user* and *relevant demand facility*. Although defined in the OS network code it is still not clear who exactly are meant with the term significant grid users. As a consequence it is not clear for whom the articles in the Network Code(s) are relevant. Both definitions need to be more specific and the Network Codes should mention the criteria. Above that, the proposed list of relevant demand facilities and significant grid users must be made public as soon as possible. Also, when establishing the list of relevant power generating modules and demand facilities (article 24), TSOs should consult and inform the owner and operator of each Power Generating Module or Demand Facility.

- It could be that the non-availability of demand facilities or industrial power plants represents commercially sensitive information. For example, if it is known that a company with a specific chemical cracker has an unplanned outage this can lead to excessive price distortion on this specific chemical market. Therefore, the industrial power plants and demand facilities contained in the list have to be kept confidential and only be known to the TSO and the owner and operator of the specific unit in question. Vis-à-vis other addressees of the list, this information must only be disclosed anonymously.