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Remarks on ENTSO-E Network Code Operation Security
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Remarks for adaptations

Imprecise definition of „Observability Area" Article 2, 19(1), 19(2)

- The expressions "relevant" and "significant" are used inconsistent with different meanings in different articles leading to misinterpretations.

- TSO defines assignment of distribution networks to be part of Observability Area solely - no limitation. No involvement by DSO.

- Might lead to unnecessary data exchange, high costs, workload and disability on operation of the Distribution Networks.

- Assignment not limited to the distribution network at the transmission connection point but is open for entire distribution network.

- Assignment criteria is unclear and equal treatment amongst TSOs and the affected DSOs not guaranteed.

Proposal

→ **Affiliation of Distribution Networks to be part of Area with DSO involvement**

→ **Clear regulation when Network becomes "relevant" or "significant" for TSO**

→ **Definition should only be limited to cross-border issues.**

Remarks for adaptations

Inconsistent definition of "Significant Grid User" Article 1(3), 2
- Article 2 is not reflecting the definition of 1(3). This important definition must be consistent and clear.
→ **Adaptation of definition according to 1(3)**

Adaptation of Voltage Ranges Article 10(1)
- The Voltage is perfectly controllable by TSO. It is unclear why the TSOs need such wide ranges and requested to keep them with best interest only.
→ **Set real operational target with range of +/- 5% during 99.9% of time**

Usage of "endeavor"
- Expression is more a declaration of good interest without binding character for TSO.
→ **Replace with binding definitions.**