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Per email: consultation2011E05@acer.europa.eu

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ACER consultation on Draft Framework Guidelines on System Operation

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Dear Ladies and Gentlemen,

EnBW welcomes the opportunity to comment on ACER's consultation on its draft Framework Guidelines on System Operation.

We answer the consultation questions as follows:

Question 1: The Initial Impact Assessment (IIA) identifies the following challenges (i) growing amount of distributed generation and variable generation (ii) increasing interdependence of control areas. Are there additional key cross-border challenges that the Framework Guidelines (FGs) and Network Code(s) on System Operation should address?

Not from a PGF (Power Generating Facility) viewpoint.

Question 2: The Framework Guidelines identify a number of actions and requirements to be included in the Network Code(s) as a solution to these challenges. Are the actions and requirements identified in the Framework Guidelines appropriate to solve these challenges?

The requirements may be rather sufficient for SOs, than for PGFs. The issues of PGFs are not considered, e.g. the following cited articles:

"The TSO and the DSO shall agree how these instructions are delivered in practice. This applies also for those DSOs connected to another DSO's network." This shall also be agreed by PGFs.

"Where net benefits are negligible or enforcement cannot be justified for particular reasons (e.g. technical non-feasibility), existing users might be granted temporary or permanent exemption. This shall be documented and monitored." There

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should be mentioned who is responsible for granting derogations. The TSO alone must not be responsible for granting derogations. The TSO must justify any change in its existing codes in technical areas such as voltage, frequency, reactive power, etc. by providing a technical analysis of why the existing standard is not sufficient. Harmonization of codes should not be a reason in itself to impose costs on grid users. The FG should state that Network Codes have to list the responsibility of the TSO not to take voluntary action which will cause plants to be unable to meet requirements i.e. designing, sectionalizing or granting maintenance outages that reduce the short circuit level at a generator location such that its requirements for reactive power or transient stability can no longer be met.

Question 3: Are the proposed levels of harmonisation sufficient to solve these challenges?

This is a SO topic. Not relevant for PGFs.

Question 4: Should the Framework Guidelines be more specific with regard to areas that need to be harmonised, both across and within synchronous areas?

This is a SO topic. Not relevant for PGFs.

Question 5: Should the Framework Guidelines require the development of common rules for System Operation between synchronous areas?

The FWGL requires the common rules for System Operation, otherwise it would be useless.

Question 6: Considering the current arrangements of the system operation rules and procedures throughout the EU, what would be an appropriate level of detail for the Network Code(s) on System Operation?

The NC Working Draft displays the required level of detail.

Question 7: What key benefits and types of cost would you expect for compliance with these requirements? Please quantify from your point of view.

Benefits and costs for PGFs:

We can't identify any benefits to our PGFs, only costs.

Several investigations would be necessary to identify an exact amount of funds needed to match the requirements for compliance set by the NC Working Draft. A first estimation has shown that the costs could be at least some millions of euros. Some requirements even can't be matched with available technical devices.

Question 8: Should the Framework Guidelines be more precise on organisational aspects of operational security, in particular with regard to security assessment?

There are some aspects whose responsibilities aren't exactly addressed, i.e. most provisions should also be agreed by the PGF, e.g.:
Technical equipment needed for e.g. Operational Security.
Information exchange to and from the TSO, as well as the requirements to be able to receive and to execute the instructions sent by the TSO and/or DSO.

Question 9: Are the implications for significant grid users clear and relevant?

It is not clear what is meant by "significant on the basis of their impact..." the TSO can decide whether a PGF is relevant or not, this is not acceptable.
The plants which are significant from the viewpoint of the transmission network should be clearly defined in the FG.

Question 10: Are the roles and responsibilities sufficiently addressed?

The roles and responsibilities for TSOs and DSOs may be sufficiently addressed, though there are many paragraphs not acceptable to PGFs, e.g. see Topic 1 roles and responsibilities (the TSO can decide whether the PGF has to bear the costs or not).

Question 11: Are the individual provisions under Scope & Objectives, Criteria, Methodology & Tools, Roles & Responsibilities, Information Exchange and Implementation Issues, associated to the particular topic, adequate? Should there be any additional elements?

There are no other elements relevant for PGFs.

Question 12: Could you foresee any other relevant New Applications which should be mentioned in these Framework Guidelines?

Not from a PGF viewpoint.

EnBW hopes that its comments contribute to ACER's consultation on its draft Framework Guidelines on System Operation.

We remain at your disposal should you have any further enquiries.

Yours sincerely

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