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Memo

Vereniging
Energie-Nederland

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To ACER
From Energie-Nederland

Subject response to ACER consultation on FG System Operation

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Introduction

System operation is the core business of a TSO. The Framework Guidelines on System Operation (FG SO) are therefore very important and forms a basis for several other guidelines and codes. In our view these should cover the operational philosophy of the TSO and the rights and obligations for network users and the TSOs. Furthermore it should provide the performance indicators for system operation.

This Framework Guideline is especially interlinked with the FG and NC on Grid Connection and Balancing. In the FG SO the justification for the rules for network users should be justified. This should be done by a clear cost benefit analysis of options for every rule drawn up.

Furthermore this FG SO should ensure that the TSOs act as one in order to gain maximum efficiency of the use of the European grid. This means that the FG SO should give rules to ensure operational integrations of TSOs.

Conclusion regarding the current draft

The current draft of the FG SO doesn't give enough clarity on the issues mentioned above. Therefore we do not feel that this draft is yet ready to be used as a basis for network codes. We believe the document should be re-written and ACER should re-issue a second draft for consultation. In the following sections we elaborate on our opinion on the missing issues.

Operational philosophy
With operational philosophy we mean the description of the way the network is operated. First step is to define the security standards to be met. Than it also includes the description and justification of several security and transport criteria e.g. use of the n-1 criterion in operation, handling of frequency deviations, reserve requirements and activation strategy, reactive power requirements and activation. System operation should be neutral to technology. Obviously new system developments should be a taken into account, but should only lead to changes in exceptional circumstances.

TSOs act as one
The current system has its inefficiencies due to the fact that the network is divided in several control areas operated independently. Operating a system as one system will lead to elimination of such inefficiencies. The FG SO should therefore give clear rules for coordination and harmonization. In operational terms one could think of netting of Area Control Error, what data and information exchange in the different steps of operation, which procedures have to be harmonized.

Relation with the market
All services required by TSOs should be mentioned and justified in the FG SO. This also counts for the requirements for grid connection. The FG SO should also describe the obligations towards network users. The market-based purchase of services should be ensured en described for reactive power and black start services. Detailed rules for the market design for reserves and balancing should be described in the FG balancing. We consider dispatch as congestion management to be treated in the FG and NC CA&CM.

Answers to consultation questions
For the answers to the consultation questions we would like to refer to the input of Eurelectric.