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Consultation Questionnaire

General comments

The Framework Guidelines clearly state in their scope (page 6) that *“The Network Codes for System Operation shall elaborate on relevant subjects that should be coordinated between TSOs, as well as between TSOs and Distribution System Operators (DSOs)”*.

GEODE as a European association representing DSOs considers that the FG should contained a clear statement to assure ENTSO-E closely involves DSOs in the drafting process of the NC on system operation.

General Issues

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?

GEODE considers that new coming energy services and tariff models to achieve customer flexibility could be added to the already identified challenges.

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?

No. GEODE considers there needs to be clarity about the underlying system security standards that are to be developed for Topic 1. These will be fundamental and must be underpinned by rigorous economic assessment. Similarly for Topic 5, the growth of distributed generation makes system restoration less straightforward. Also differences between regions/countries have to be considered (for example major differences in cold load pickup behaviour). However any changes from the current approaches to system management that might be necessary to provide enhanced management under emergency conditions are likely to be very expensive to implement. A thorough cost benefit

will need to be undertaken to demonstrate the value of making such changes. The FWGL should be more prescriptive of the underlying economics that ENTSO-E should be considering in drawing up both the Network Code and its impact assessment.

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

Yes, but also differences between regions/countries have to be considered.

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

GEODE considers the Framework Guidelines should not be more specific. It is for ENTSO-E to develop the detail. However any increase from existing requirements must be justified by an impact and cost/benefit analysis. This is not trivial, but must be done before imposing new costs on the industry and hence onto energy customers.

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

Yes GEODE considers that common rules for operation between synchronous areas are required. Common rules for operation within the synchronous area, not necessarily. Common rules within synchronous areas imply that the different requirements within the synchronous areas have to be considered on the European level.

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?

Given that the Network Codes will become EU law, it is important to keep the drafting at functional specification and principles. Rules covering the fine detail must be developed locally/nationally, so that they can be modified easily to reflect changing needs. Clearly local rules will need to be fully compliant with the NC, or will be illegal.

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

Good system operation requirements will deliver the desired levels of security at minimum cost. The challenge for these FWGL and the NC will be the definition and justification of the system security standards that are to be achieved. The

timing is appropriate given the need to ensure total system security reflects the growth of small scale generation.

For some countries as GB and Sweden there seems to be very little, or possibly no, benefit from these requirements, only additional layers of bureaucracy.

The cost for compliance with the requirements will mainly depend on the definition of the term “significant grid users” (i.e. how many customers are included in this term. Therefore cost benefit analyses should be applied at this point.

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

This is probably a technically complex area – but one that would benefit from rules demanding transparency so that market participants can seek appropriate assurances that security actions are being taken in a fully non-discriminatory manner.

Specific Issues

9. Are the implications for *significant grid users* clear and relevant?

No. Given that ENTSO-E appears to have included all customers down to those with a 400W PV system as significant, it is hard to see what the term means. The process either effects all users to an extent appropriate to their effect on and needs from the total system, or you define what is the threshold of significance and stick to it.

In most ways there should be no distinction to how a customer is treated technically whether connected to a DSO or TSO system. However issues that are essentially local, such as voltage control, have always, and will always, be managed locally – and these have no place in the Network Codes.

10. Are the roles and responsibilities sufficiently addressed?

Roles and Responsibilities are addressed solely to TSOs. Given that the network codes apply to DSOs as well, it would be appropriate to change TSO to SO (system operator) in many of the instances in the tables for Topics 1 – 4. Topic 5 should acknowledge the role of the DSO both for Network Code purposes and local events.

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?

No suggestions at this time.

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

Not at this time.

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No