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Consultation Questionnaire

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?

In addition to the challenges identified in the Initial Impact Assessment (IIA), Framework Guidelines and Network Code(s) on System Operation shall address the increase of higher load flows and transactions at interconnections due to higher load-demands.

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?

In the document, one of the three challenges is to clarify and harmonise TSO's roles, responsibilities and methods. In addition, we believe that it shall be clearly defined DSO roles and responsibilities (i.e. DSO must responsible for the Demand side management-task „Network load control“ to ensure system stability, network security and reliability).

Most issues affect the operational interface between TSO and DSO and/or the operation of the DSO himself directly. This creates new responsibilities for DSOs or at least the formalization of the practice. The DSOs, which seems to be affected by at least some of these framework guidelines, cannot take part directly in this development process, but only during the comitology. All these guidelines will be developed by ACER and ENTSO-E. We think it is essential that DSOs will be integrated and have equal rights to ENTSO-E in this process of developing framework guidelines.

These framework guidelines include new responsibilities for DSOs or at least the formalization of the practice. Thus it seems crucial to involve DSO-organizations at the same rank as ENTSO-E in the development of the framework to maintain usability and acceptance. Only the inclusion of DSOs in this process ensures practicable framework guidelines.

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

The proposed levels of harmonisation proposed are in principle sufficient to solve these challenges. However, in “Operational security”, it shall be addressed the establishment of requirements for “Fault ride through“-capability and how this will be harmonised amongst System Operators.

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

In “Operational security”, it shall be addressed the establishment of requirements for “Fault ride through“-capability and how this will be harmonised amongst System Operators. Also, it shall address other topics such as integration of renewable, wind, energy, etc and requirements under normal operation, in alert (disturbed) operating states as well as in critical (emergency) operating states.

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

In section 1.2 Application, it is mentioned the prevailing character between the existing national and international codes and the new Framework Guidelines. This applicability shall be clearly addressed through the Framework Guidelines.

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?

It shall be taken into account all existing operation rules and procedures thought the EU on a national/regional basis. In particular it shall be consider the “fault-ride-through“-capacity” existing in several countries as well as the implementation of procedures to cover renewable energy, such as wind and solar.

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

Here should be clearly pointed out, that the economic viability of the implementation of these Framework Guidelines on System Operation is often given by political economy for the whole society not necessarily by managerial economy for the DSO. So it is absolutely crucial for the successful deployment of FGs, that costs (i.e. in order to comply with these additional requirements) are fully accepted by the Regulators and socialized, for example, via grid-tariffs.

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

As mentioned in question four, in “Operational security”, it shall be addressed the establishment of requirements for “Fault ride through“-capability” and how this will be harmonised amongst System Operators. Also, it shall address other topics such as integration of renewable, wind, energy, etc and requirements under normal operation, in alert (disturbed) operating states as well as in critical (emergency) operating states.

Specific Issues

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

The provisions of data protection have to be fulfilled. The access to system of the DSO for 3rd parties can not be granted due to security reasons and security of supply issues. The DSO will provide data to all stakeholders in a no decriminalize manner if the customer agrees.

It is important to remark that it should always be clear to customers who have access to their data and for what purpose.

10. Are the roles and responsibilities sufficiently addressed?

We would like to add that it has not been stated the difference between the DSM (Demand Side Management) and DR (Demand Response) roles. We would like to highlight that the DSO is the single stakeholder responsible for DSM in case of „Network load control“ to ensure system stability, network security and reliability.

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?

s. answer to question 9 and 10.

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

As mentioned in previous questions, it shall be addressed the establishment of requirements for the integration of renewable, wind, energy, etc and requirements under normal operation, in alert (disturbed) operating states as well as in critical (emergency) operating states.

Confidentiality

Please state whether you would like ACER to treat your contribution confidentially. If yes, please provide a non-confidential version of your answer.