Ref: SOESC 02-02

2nd System Operation European Stakeholder Committee (SO ESC) Meeting

Tuesday, 6 June 2017 from 11:00 to 15:30

Grand Hotel Union, Miklošičeva 1, 1000 Ljubljana, Slovenia

Draft Minutes

Participants			
Uros	GABRIJEL	ACER	Chair
Jakub	FIJALKOWSKI	ACER/E-Control	Joining as of item 4
Jeremy	VINCENT	ACER/CRE	
Maria Eugenia	LEOZ-MARTIN-CASALLO	European Commission	Via webstreaming
Tahir	KAPETANOVIC	ENTSO-E	Joining as of item 3
Jean-Philippe	PAUL	ENTSO-E	
Ramiro	FERNANDEZ-ALONSO	ENTSO-E	
Knud	JOHANSEN	ENTSO-E	
Sonya	TWOHIG	ENTSO-E	Joining as of item 4
Kristel	ROMEO	ENTSO-E	
Stela	NENOVA	ENTSO-E	Secretariat
Rafal	KUCZYNSKI	ENTSO-E	
Marc	MALBRANCKE	CEDEC	
Michael	WILCH	EDSO for Smart Grids	
Aurelio	TUBILLEJA	EDSO for smart grids	
Luca	GUENZI	EUTurbines	
Ton	GERAERDS	VGB Powertech	
Klaus	OBERHAUSER	VGB Powertech	
Garth	GRAHAM	EURELECTRIC	
Sanni	AUMALA	EURELECTRIC	
Jan	RASMUSSEN	EURELECTRIC	
Thomas	LESCARRET	EURELECTRIC	
Toma	MIKALAUSKAITE	Orgalime	
Michael	VAN BOSSUYT	IFIEC	
Stein	OVSTEBO	IFIEC	
Christian	RAUNIG	GEODE	
Florentien	BENEDICT	CEDEC	
Goran	DROBNJAK	EASE	
Pavla	ERHARTOVA	Europex	

1. Opening

1.1 Welcoming Address and Draft Agenda

SO ESC Chair Uros Gabrijel (ACER) welcomes the participants to the 2nd SO ESC meeting. The draft agenda is approved. Items 4 and 5 switch places and one additional presentation by Eurelectric is included under point 5. After a brief tour de table, the Chair introduces Jakub Fijalkowski (ACER/E-Control) as a Vice-chair of the ESC.

1.2. Review and approval of the minutes from previous meeting

The minutes of the 1st SO ESC meeting are approved without further comments.

2. *Answers to previous meetings' questions*

2.1. *Interpretation of SOGL[1] Article 40 regarding the order of handling the different paragraphs*

Ramiro Fernandez-Alonso (ENTSO-E) presents ENTSO-E's answers to questions from the 1st SO ESC meeting. The presentations with the answers are available for reference here. Ramiro Fernandez-Alonso (ENTSO-E) presents a general timeline for the development of respective methodologies and NRA approval for Articles 40, 41-53 and 75(1). According to the legal obligations, early implementation for data exchange provision will be needed in order to fulfil all requirements on time.

ENTSO-E recommends that early implementation of data exchange provisions on a national level already takes place and that the current definition of observability area is used for defining the scope of data exchange and the processes at this stage until the methodology for observability area is defined. A first informal workshop on CSA[2] methodology (Article 75.1) is planned for autumn 2017, with a formal consultation foreseen in February 2018.

Marc Malbrancke (CEDEC) asks whether there is a confirmation of all TSOs to start this early implementation which would be needed to observe the tight timelines. Ramiro Fernandez-Alonso (ENTSO-E) confirms that this is a general common understanding at ENTSO-E and that early implementation is necessary else there is a tight deadline.

Garth Graham (EURELECTRIC) notes that regarding data exchange, it is key for stakeholders to know whether existing or new data will be required from both new and existing parties. For example, a small generator who does not provide today but might need to do so in the future (and this means to them it is new data) needs to be informed. It needs to be clarified whether data gathered is only existing data from existing parties or also new data (where new data means if they never provided it before).

Ramiro Fernandez-Alonso (ENTSO-E) confirms that TSOs can request the amount of data that is considered to comply with SOGL requirements, to perform the sensitivity analysis, and the new regulation gives a possibility for this to be resolved.

Garth Graham (EURELECTRIC) notes that for example because of banding thresholds as determined by MS, some type B generators can eventually be classified differently than originally, and they would fall under new obligations of SOGL to provide data which was not required before. Garth Graham (EURELECTRIC) notes that in relation to observability, it would be helpful to have a simple map of TSOs showing each TSO's observability area as this is important especially on boundaries where the observability area of one TSO touches another TSO's observability area. If there is no clarity, one may miss the fact that the neighbour has defined his observability area and there could be issues on data required so it is important to enable to see boundaries and how to connect. Eurelectric is interested to understand why one TSO is able to see much deeper than another TSO in their area so a map displaying the various areas and definitions used (such as control area, observability area, outage planning coordination area etc.), would help stakeholders understand better where they might have an impact on the system. All these areas have an impact on generators and where they stand and are also related to other codes like the CNCs (connection codes), ER etc.

Jean-Philippe Paul (ENTSO-E) clarifies that Article 75 prescribes for the development of the methodology for determination of observability area which is then to be applied by each TSO, and the data feeding into this is always managed by the respective connecting TSO. The workshop on the observability area and on how to define it will be a first occasion to better understand this.

Ramiro Fernandez-Alonso (ENTSO-E) notes that the various methodologies and areas will be defined and approved by respective NRAs, but confidentiality needs to be ensured. ENTSO-E will check the possibilities for publishing this type of information and maps.

To ensure transparency, the Chair invites ENTSO-E to explore a generic format of publishing observability area information by each TSO without jeopardizing critical infrastructure.

2.2. *Definition and interpretation of "existing/new SGUs" and the requirements they should comply with across the CNC and the SOGL.*

Ramiro Fernandez-Alonso (ENTSO-E) provides ENTSO-E's understanding of the interpretation of "existing/new SGUs" and the requirements they should comply with across the CNCs and the SOGL (slides available here). The CNCs define the technical capabilities of the facilities once the codes have entered into force while the SOGL defines the use of those capabilities once they are connected to the network.

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[1] System Operation Guideline

[2] Coordinated Security Analysis

ENTSO-E's understanding is that in general no additional technical capability is requested from facilities by SO GL, and the only place where a technical capability may be requested is the exchange of real-time data. ENTSO-E's recommendation on the interpretation is to use a similar approach as voltage control: facilities should declare their technical capabilities and then comply with the SOGL according to those technical capabilities.

Marc Malbrancke (CEDEC) asks for a confirmation whether the ENTSO-E's answer (as in the slides) means that for existing installations having real-time data exchange capabilities, they should declare if they are able or not to exchange real-time data, and if they don't have the possibility to exchange, then they do not have to. He asks if ENTSO-E could confirm that the DSO view on this from the previous meeting is correct as the answer (as in the slides) does not say yes or no regarding the need for new supplementary requirements for existing installations with their existing capabilities. Based on the ENTSO-E's slides, this seems to be correct.

Ramiro Fernandez-Alonso (ENTSO-E) notes that regarding the last part, the requirements are to declare the capabilities and then comply with the SOGL according to those technical capabilities and that the SOGL does not request additional technical capabilities to existing installations.

Marc Malbrancke (CEDEC) would like a written confirmation that this is the correct interpretation.

Jan Rasmussen (EURELECTRIC) asks a clarification whether it means that if the communication is not established, then it will not be required to be established. Lots of generators will have capability to exchange data but no line might be there at the given moment and that would be costly. Ramiro Fernandez-Alonso (ENTSO-E) clarifies that a communication line is not a capability of an SGU. The communication depends on the implementation of the TSO and the relevant DSO but cannot be included as a technical capability (see also slide 7).

Jan Rasmussen (EURELECTRIC) asks whether for all type B generators a TSO can require data communication without any justification. Ramiro Fernandez-Alonso (ENTSO-E) confirms that indeed for all type B generators it can be requested to have the capability for real-time data exchange.

Garth Graham (EURELECTRIC) asks about the interpretation of storage based on Article 2.1.d on existing and new demand facilities, it seems that if they provide DSR directly to a TSOs, they are classified as SGU, but if they do not provide a service to a TSO, then it is not clear if they have to comply with SOGL, and it appears they could but it can avoid the SOGL if they are not providing a service to the TSO.

Ramiro Fernandez-Alonso (ENTSO-E) clarifies that storage is not included in connection codes, and it does not have to comply with SOGL if they are not SGU. If they provide services to the TSO, they will be SGU and will have to comply with the SO GL.

The Chair notes that the national legal framework still applies in this case.

Thomas Lescarret (EURELECTRIC) notes the list of data required for stability should be the same regardless of the country and the TSO. If some data is available on unit, but no line exists to transmit data or if data is not needed, then there should be no request to the generator.

Ramiro Fernandez-Alonso (ENTSO-E) clarifies that SOGL Article 2 defines the list of data, but format of data may be different from country to country.

Garth Graham (EURELECTRIC) notes that in principle data and format should be same across all TSOs to allow for future exchange with the common grid model. Over time, a move to formatted data can be the way forward.

Jan Rasmussen (EURELECTRIC) asks whether it is possible that a TSO decides to change the format by implementing SOGL from analogue to protocol RF61000. It seems that there are very costly requirements for generators to implement this on the generators' side if it would be required.

Ramiro Fernandez-Alonso (ENTSO-E) notes that the SOGL does not specify format at the national level. It can be assumed that the TSO will not want to change the format from the current one.

Marc Malbrancke (CEDEC) notes that Article 40 says that TSOs and DSOs should agree on the format for the data exchange and this will be the way of going forward. If all parties agree on a new format or on an existing format, then there is no use in inventing something new.

The Chair reminds that regarding the regulatory aspects, SOGL Article 4 obliges the implementing entities such as MSs, competent authorities and system operators to follow principles of proportionality and lowest total costs for all parties involved, and this will have to be considered.

2.3. Is a reference to Art.17 (GLDPM) in the FCA missing and only CACM and SOGL should be taken into account?

Ramiro Fernandez-Alonso (ENTSO-E) clarifies that with the current draft, GLDPM according to CACM shall be taken into account and GLDPM according to FCA may be taken into account. However, the fact that FCA is not explicitly mentioned does not prevent methodologies from taking it into account (slides available **here**).

Marc Malbrancke (CEDEC) requests that this is mentioned directly with a clear Yes or No to the question to ensure correct understanding for all.

3. System Inertia Roadmap (holistic approach throughout the suite of network codes)

Knud Johansen (ENTSO-E) presents ENTSO-E's holistic approach across the codes to the topic of system inertia and related issues on stability (slides available here). System inertia as an essential feature of frequency stability can have an increasingly important impact on system stability in the context of increasing displacement of synchronous PGMs by power generating units connected through power electronics and will require accordingly different user design to meet the challenge of emulating the transient behavior of those synchronous PGMs leaving the system.

Within the context of the CNCs, requirements will be defined to ensure that system users are equipped with technical capabilities to ensure adequate performance under normal and disturbed operating conditions to contribute to maintain and restore system security (such as synthetic inertia of power park modules in RfG, very fast active power control through demand response in DCC, and synthetic inertia of HVDC systems). A series of Implementation Guidance documents (IGDs) have been developed so far to guide the national decision-making and its preparation, and future studies will inform those detailed technical specifications and analyse improvements on system stability, but also to identify possible drawbacks.

Goran Drobnjak (EASE) notes that as inertia is usually required immediately, there is no need to communicate to assets that provide it. If frequency goes down, then service capability should respond. In a wind power plant this is more complicated and for a short time very critical but in the long term falling back – mechanics of implementation should be looked through capabilities of assets in the system. In the future, more wind and solar are expected in the system, and the system will need more resources like inertia support, frequency support etc.- these should be included in the analysis of the needs of the future development of the system, and power electronics can do lots for the system.

Knud Johansen (ENTSO-E) explains that from a system design perspective, the TYNDP scenarios per synchronous area and per MS provide a basis for further long-term analysis on the development of system inertia, but they do not identify tipping points and reference incidents at this stage.

From a system operation perspective, ENTSO-E will perform bi-annual inertia studies as per the SOGL to serve as an indicator of the overall system stability development. Two task forces (on system inertia and on over-frequency control schemes) for Continental Europe will deliver further recommendations for CNC implementation. From a market perspective, open questions to investigate include the consideration of inertia as an ancillary service and the role of the market procurement of virtual inertia, cross-border trade, technical limitations etc.

ENTSO-E will first work in parallel on studies on long-term system development and performance (SD) and dynamic stability assessments (SO) to help identify tipping points, reference to incidents to maintain stability and security, then define further technical capabilities of system users and afterwards, define ancillary services and market products for delivering inertia.

Ton Geraerds (VGB Powertech) asks if one wants to make inertia a market product, how is this going to be done with existing generators as inertia providers.

Knud Johansen (ENTSO-E) explains that it depends on the types of generators, and the market will provide solutions (for example 500 milliseconds market).

Jan Rasmussen (EURELECTRIC) suggests that it might be better to look first at what the expected need is and specify the function, then actors can react to that and create solutions and activate only the ones that are needed in the future.

Tahir Kapetanovic (ENTSO-E) reminds that the stability in the electric power system is based on physics and the system should be kept resilient in conditions with unpredicted loss of milliseconds and microseconds, which are now mitigated by existing synchronous machines in the grid. The first study on inertia will be done in 2 years after SOGL entry into force and it will show how and where in the synchronous area there are periods of time for which there is a need to procure something for stability. Stability requirements themselves do not change, but conditions change, and that is why the function needs to be defined first and foremost, not so much the responsibility of TSOs, also to avoid creating any additional service or costs.

Stein Ovstebo (IFIEC) addresses how the power intensive industry can act and contribute to a cost-efficient operation of the power system in this situation (in terms of stability, active power etc.). The power intensive industry with its predictable and stable base load power consumption represent a sufficient and efficient contributor to the transmission systems need for stability and flexibility in the ongoing transformation of the power system with introduction with mainly small and decentralized units with unpredictable renewable power plants and shutdown of conventional nuclear and fossil based power production capacity.

Tahir Kapetanovic (ENTSO-E) welcomes this and notes that the study needs to be done first and to identify the respective needs.

The Chair reminds that stakeholders would be able to contribute to the studies in the respective timelines and they are welcome to raise their considerations.

Knud Johansen (ENTSO-E) clarifies that the short circuit management is a part of the stability study. ENTSO-E will hold a workshop in end-October with all stability analysis groups covering ENTSO-E area to discuss and agree which procedure will be used, and further details will follow afterwards.

Ton Geraerds (VGB Powertech) welcomes the presentation but notes that in addition what is missing, based on the RfG is a point on countermeasures to be adopted such as synthetic inertia: a basic point of the RfG (page 4, item (25)) is that "*therefore countermeasures should be adopted, to avoid larger rate of change of frequency during high RES production*" and attention should be paid to this.

Knud Johansen (ENTSO-E) notes that the IGDs on the RoCoF and high penetration give guidance on that issue.

Michael Wilch (EDSO) makes a reference to rotating phase shifters that could be used in the transmission system to support inertia.

Luca Guenzi (EUTurbines) asks if some possibilities are foreseen in studies on how to deal with frequency in different operations on the grid such as induced island mode operations, instead of just a market product – the possibility to consider the operational condition of the grid can help.

Knud Johansen (ENTSO-E) notes these topics can be discussed in the EGs after the workshop in October.

Thomas Lescarret (EURELECTRIC) welcomes the ENTSO-E presentation and asks about timelines on when it can be expected to identify tipping points and results of studies as this should be done step by step, not only with a target horizon of 20 years. This identification is not included in specific studies for grid connection, but May 2018 is the deadline to finish implementation on this for the CNCs.

Knud Johansen (ENTSO-E) clarifies that this will be done at the workshop in October, and results will be made visible.

The Chair asks ENTSO-E to enrich the last slide of the presentation with dates and approximate times when the respective studies will take place and when the interaction with stakeholders is planned. The chairs of the 3 ESCs will ensure that the discussions are coherent across any topics that are cross-cutting as per the ToRs.

4. Commission Update on the NCs

Regarding **SOGL**, scrutiny has passed through the EP and Council without any objection on 25 May and now there is a green light for the EC adoption process. After scrutiny, the regulation should go through all respective EC hierarchy (cabinets, college of commissioners, etc.). It is expected that this might take 1 month, the SOGL can be adopted by end of June and then expected to enter into force by end-July.

On **ER NC**, the EC is in contact with MSs concerning translations and once this is finalized, scrutiny is about to be launched in the next couple of days, lasting 3 months. The adoption process can be expected to be over before the end of the year.

On **EBGL**, the EC is in touch with MSs regarding translations. Some MSs have sent comments and some indicated they would send comments but have delayed. After changes are implemented, MSs will review the text again. The aim is to have the text of EBGL for scrutiny right after summer with the aim for adoption before end-year depending on translations. Maria Eugenia Leoz-Martin-Casallo (EC) confirms that the first deadline of SOGL is 6 months as of entry into force which is 20 days after publication in the official journal. The timing for consultation, adoption and publishing in the Official Journal have only few days' difference between, depending on the speed of internal processes.

5.1. Proposal on how to manage issues by stakeholders

Sonya Twohig (ENTSO-E) presents a joint proposal by ACER and ENTSO-E is (available here) on managing questions by stakeholders. The aim of the tool is to make full use of the ESCs, bridge the time-gap between ESCs' meetings, and provide a one-stop shop as a source for major implementation issues raised at the ESC's level. The process proposed will be: first issues raised by stakeholders are first discussed at the ESC meetings. During the meetings, questions will be formed and addressees will be chosen for issues that cannot be fully addressed in the discussions. The questions agreed will be posted on the issue logger (to be put on the ESCs' webpage) and answers to the questions will be posted upon addressees providing their answers (in advance of the next meeting). The tool designed to serve the Q&A process will be developed further based on needs to show as well the status of each answer provided. ENTSO-E will remain the only hub and owner of the tool (i.e. logging the questions and answers as received). Everyone will be able to view the Q&A but not have edit rights on the site (only ENTSO-E can upload the information).

Stela Nenova (ENTSO-E) provides a quick demonstration of how the tool works and its basic functionalities.

The Chair clarifies the tool will be used only for questions formulated in the ESCs, not for questions outside the ESC in order to keep the process manageable.

Garth Graham (EURELECTRIC) expresses his support of the tool as the answers to be provided are important for stakeholders and suggests additional functionalities to make it possible to search article by article and code per code as well as the use of traffic light system to show easily the status of each answer given (if discussed and agreed at the ESC (green) or if pending etc.). Stakeholders would appreciate if possible to receive notifications every time an answer has been logged into the tool to ensure timely information.

ENTSO-E will take the feedback provided after discussions in the ESCs, and can improve the functionalities of the tool respectively.

The Chair confirms that an answer can be assigned to more people for action and it is not exclusive of other stakeholders in case a consensus/agreement may be needed among several parties. Also, if comments and questions are provided to the given answers in the tool, those will be discussed at the following meeting together with the answer options to find a commonly agreed position and ensure the question is exhaustively covered. A suitable approach will be discussed to provide for adequate treatment of cross-committee issues based on discussion in all the relevant ESCs depending on the questions raised.

5.2. Eurelectric proposal (supported by the other associations representing DSOs)

Sanni Aumala (Eurelectric) welcomes ENTSO-E's proposal on the issue logger and presents Eurelectric's proposal as initially developed for the GC ESC, on a process of handling stakeholder questions between ESC meetings (presentation available **here**). Eurelectric would like to see possibilities for more early and active stakeholder involvement in making the responses to the questions, not just receiving the responses when ready.

The Chair notes that in case 2 ESCs have differing views on a topic, members can be brought together to find a joint solution. The ESCs ToRs further foresee the creation of ad-hoc expert groups if needed so to tackle specific issues.

Michael Van Bossuyt (IFIEC) notes the main concern is to ensure all relevant parties are represented accordingly.

The Chair reminds that like the Expert Groups on IDGs were created to tackle such kind of issues, and not only to draft them but also to improve them. As a general understanding, ENTSO-E is currently still convening 3 EGs on a larger subset of IGDs for the implementation, and once an item is resolved, ENTSO-E will form another technical group on another IGD where needed. This approach is fit for purpose and additional bureaucracy should be avoided. The experience of the GC ESC will be used to provide further guidance on this topic. The Chair reminds of the different nature of the SOGL as a guideline on European and regional methodologies from the CNCs, and that common approach is needed for all ESCs and not for the expert groups themselves which are created on ad-hoc basis. Regarding the CNCs' national implementation, the word "recommendation" used in Eurelectric slide is too strong – there are different interpretations but only the ECJ has a final legal say.

Jan Rasmussen (EURELECTRIC) asks what happens in case of disagreements on interpretation and if a solution is to be found at a European or a national level, for example the question on the amount and type of information on real-time data exchange that should be delivered (Article 40.5 and link to Article 50 of the SOGL).

The Chair notes that there will be NRA approval of the TSO proposal as per the article.

Jan Rasmussen (EURELECTRIC) notes that Article 50 of SOGL states *"Unless otherwise provided by the TSO, each power generating facility owner of a power generating module which is a SGU in accordance with Article 2(1)(a) and 2(1)(e) connected to the distribution system shall provide the TSO and the DSO to which it has the connection point, in real-time, at least the following data: (a) status of the switching devices and circuit breakers at the connection point; and (b) active and reactive power flows, current, and voltage at the connection point."* It is not clear if this article should be interpreted in a European or in a national context.

The vice-chair notes this is a tool to help solve questions but the outcomes should not be mixed with formal national implementation, oversight etc. and the focus should be on European issues. Flexibility and freedom to take issues as they come and need to be solved should be preserved.

6.1. List of open requirements/articles

Thomas Lescarret presents Eurelectric's proposal for monitoring implementation and a list of open articles/requirements (available **here**). The main concern of Eurelectric is that the initial ENTSO-E presentation on SOGL implementation seems very IT-focused on data and service applications while Eurelectric would like to understand also topics that concern additionally implementation of SOGL and cooperation between TSOs for monitoring by the SO ESC.

The annex proposed by Eurelectric (available here) includes about 60 articles and requirements which include articles that refer to agreements between several TSOs, methodologies at regional level, actions requested by TSOs & ENTSO-E at various levels etc. and which are seen as having some impact on some grid users, be it DSOs or generators. EURELECTRIC's suggestion for reflection is that the SO ESC follows these particular actions and that ENTSO-E provides regular information on the organization for each coordination or cooperation expected (as there are various types of areas/regions mentioned, but no clear confirmation of the geographical scope of those areas, be it existing RSCs or future types of areas), and the preparation of these actions with main principles foreseen – to ensure engagement with grid users and stakeholders in the process.

Jean-Philippe Paul (ENTSO-E) notes that ENTSO-E welcomes the proposal but would like further clarification on the objective of the proposal. The codes and guidelines provide for formal opportunities for engagement of stakeholders on main aspects of implementation where necessary, and for the methodologies there are clear processes defined in the SOGL. In addition to the formal process, ENTSO-E plans to provide the ESC with an update on the progress regularly; however, unless there is a particular additional issue on which stakeholders would like to have further knowledge, there is less value in creating administrative burden.

Garth Graham (EURELECTRIC) notes that each TSO would usually have a checklist of all the items in every single code, and the NRA checks and ensures compliance, else there is risk of something being omitted. Such a tool should enable a one-stop shop to show implementation status across all tasks. Thomas Lescarret (EURELECTRIC) clarifies that the objective of the proposal is to bring more transparency as some stakeholders are interested in following for information some additional other topics. Eurelectric requests that the SO ESC decides on which topics should be followed. Stakeholders might benefit from a single source of information where they would be able to find supporting documents related to the NCs and processes of implementation, not just the codes themselves.

The Chair notes the experience of the GC ESC where a related topic started as a query of all non-exhaustive requirements in the CNCs and it was later decided to use the active library to monitor the process of implementation and provide the mapping of non-exhaustive requirements. From ACER's position, ACER and ENTSO-E are tasked with implementation monitoring as per the regulation and the monitoring process should not be duplicated. The active library helps informing ACER's monitoring process.

The Chair invites ENTSO-E to provide a proposal for the next meeting to support the efficient monitoring of the implementation of the SOGL and NC ER, including regional methodologies. With regard to the level of detail, principles from Eurelectric's presentation should be followed. In respect to this exercise, the Chair invites all interested stakeholders to explore how the GC ESC active library work is done. ENTSO-E is invited to have a look as to the level of detail necessary. Thomas Lescarret (EURELECTRIC) should make a proposal on how this can be done in a template-type (Eurelectric's slides for the GC ESC could be used though the granularity is high).

Garth Graham (EURELECTRIC) gives an example of National Grid type of spreadsheet which can be used for providing that type of information as one possibility. However, that might not be the right model for every country, Jean-Philippe Paul (ENTSO-E) notes.

6.2. Minimum standards

Garth Graham (EURELECTRIC) presents an example on minimum standards requirements and questions how best to harmonise those standards from the perspective of NCs to ensure efficient, proportionate and reasonable outcomes (slides available **here**). The SOGL has a number of recitals on minimum requirements which should translate into a common settlement of requirement methodology setting the standards across an entire area where it applies (ex. regional level). The question is if 2 countries, A and B, go for the same minimum standard while a third country C is going beyond the minimum standard requirement and chooses a higher one, then this means the benefits of harmonization are not delivered. The benefit of harmonization would be achieved by having a common level across with the idea to achieve better standards. Providing a higher standard in country C than countries A and B may costs someone more to provide than the minimum which is required in countries A and B, and so the benefits to consumers are not delivered in such a case. Garth Graham (EURELECTRIC) notes all need to be mindful of this potential question in the forthcoming discussions and it might appear again in the future. The question is important also in the context of Article 3.7 which notes that MS can do whatever they want as long as it does not affect cross-border trade, otherwise it would be illegal under the 3rd Energy Package.

Luca Guenzi (EUTurbines) notes that in grid connection context in real time, 10 or 20 milliseconds is already a variation. The Chair notes that in the frame of grid connection codes a threshold is given and it is specified if it is a cap or a floor or if a band is given, it is not allowed to go outside of it.

The Vice-chair notes the question of interpretation on common set of minimum requirements can also be common to all TSOs proposals and regional proposals. The EC pointed out to cases where harmonization is needed and those are subject to either all-TSO or regional proposals and approvals, and those questions are being judged as being proportionate or not. In the CACM, there are cases where some countries might need to be doing that, and NRAs are discussing these proposals, and how much they reflect the intention. In SOGL Article 6.2 and 6.3 provide for all NRA approvals where the need to harmonize is shown.

Sonya Twohig (ENTSO-E) notes that the question of what happens in country C is a regulatory one and the case a non-linear problem. Each case has to be taken separately as the NRAs need to assess the given proposal.

The Chair explains that all NCs had to comply with some principles and a justification was required where an NC went beyond existing standards. Also, where MSs could not find and agreement, the NCs remained not harmonized. MSs are free to choose their own generation mixes as well, but the transparency in the implementation should be ensured, explaining reasons for a MS's decision to go for a certain deviation from a given standard. The Chair notes it is important to stay on top of implementation and understand how codes are implemented in order to anticipate potential cases or questions rising in the future.

7. ACER update on SOCG TF

The Chair provides an update on the SOCG TF where regulators discussed regional implementation of various methodologies. They also see an importance in understanding how the guideline is being implemented in different regions, and want to learn about the regional process to avoid duplication. If transparency is attained at this level, NRAs will collect information and update in the ESC where necessary.

The Vice-chair notes the NRAs discussed the potential of merging of methodologies related to Article 75 (coordinating operational security analysis) and Article 84 (assessing relevance of assets for outage coordination) if it would be more efficient as the two articles appear to be technically very closely connected. NRAs discussed the idea and concluded that geographical parameters for approval of Articles 6.2 and 6.3 are different so legally it is difficult to enforce. The decision was not to merge into one methodology, but NRAs will closely coordinate with ENTSO-E to limit additional burden coming from these requirements.

Jean-Philippe Paul (ENTSO-E) notes that ENTSO-E will deliver a pan-European methodology for Article 75 as requested. The SOGL also requires a proposal for asset planning outage coordination at least per synchronous area. ENTSO-E will deliver a proposal by all TSOs. If there is a legal issue, the two proposals will be delivered both at pan-European level. There is a requirement for Article 84 to ensure consistency with Article 75, but it will be NRAs' task to approve the proposals and ensure consistency is preserved.

8. AOB & next meeting dates:

The Chair reminds all as per Marc Malbrancke's (CEDEC) request that all supporting material for the meetings is uploaded at least 5 working days ahead of the meeting.

Jan Rasmussen (EURELECTRIC) asks a question regarding specified requirements whether the TSOs can supply a list of information or even allow the generators not to deliver any data?

The Vice-chair responds that in the understanding of regulators, Article 40.5, determining the scope of data exchange, is subject to NRA approval.

Aurelio Tubilleja (EDSO for smart grids) asks if the list of information is a cap or a floor regarding the interpretation of the 1st sentence of art. 49 and art. 50: '*unless otherwise provided by the TSO, each power generating facility owner of a power generating module which is a SGU in accordance with Article 2(1)(a) and 2(1)(e) connected to the distribution system shall provide the TSO and the DSO to which it has the connection point, in real-time, at least the following data…*' – the question is whether this should be interpreted as a floor in both articles.

Ramiro Fernandez-Alonso (ENTSO-E) explains that the maximum amount of user information is defined as per Art. 40.5 on defining scope and applicability and this may reduce amount of information required.

The Vice-chair explains that as per the drafting of the SOGL, the intention is not to get data unless it is needed; small DSOs would not be asked for data. Therefore, it is a cap on data as per personal reading of the text. Regarding Article 40.5 and coordination with DSOs and when a reference is made to this, it will be assessed by NRAs anyway. There is a right to appeal if someone feels a TSO is asking too much.

Garth Graham (EURELECTRIC) explains if over time a TSOs says needs to obtain given data from a type of a generator, which changes hands over time, and the DSO says it cannot provide this given data, then the NRA may allow the information to be provided by another provider – provider might change over time but the amount of information to be provided is clear.

The ESC decides that there will not be a physical meeting of the SO ESC in September. ENTSO-E will propose as soon as possible a new meeting date for the 3rd SO ESC meeting at the end of November/December in back-to back with the GC ESC meeting.

On the issue logger tool, the Chair notes that benefits of all issues logged is to be looked upon. The GC ESC will also discuss the tool and see how practical it can be to log all questions from previous meetings (even if solved in a meeting) for both ESCs. The proposal will be taken and an answer will be provided before the next meeting. A new question is raised to ENTSO-E for the tool: whether ENTSO-E issue logger can be used for the purposes of recording all issues discussed in the meeting even if they have been sufficiently addressed.

9. Follow-up actions

- To provide more transparency, ENTSO-E should explore a generic secure format of publishing the information mapping observability areas of TSOs once this information is available, without jeopardizing critical infrastructure.
- ENTSO-E should provide: a clear written confirmation about the correct interpretation of the answer to question 2.2 and a clear answer to question 2.3.
- ENTSO-E should enrich the last slide of the inertia roadmap presentation with dates and approximate times when the respective studies will take place and when the interaction with stakeholders is planned.
- ENTSO-E will take the feedback and ideas for improvements provided in the discussions in the ESCs, and improve further the functionalities of the issue logger tool. ENTSO-E should see whether the issue logger can be used for the purposes of recording all issues discussed in the meetings (including from previous meetings) even if they have been sufficiently addressed at the meeting.
- ENTSO-E should provide a proposal for the next meeting, based on Eurelectric's presentation, to support efficient monitoring on implementation including on methodologies on a regional basis. ENTSO-E should define the level of detail on different topics to be followed as mentioned in Eurelectric's presentation (slide 5 – principles but not details on how it will be delivered) and the type of delivery.
- To help this discussion, Thomas Lescarret (Eurelectric) should make a proposal on how this can be done in a template-type (Eurelectric's slides for the GC ESC could be used though the granularity is high).
- ENTSO-E will propose as soon as possible a new meeting date for the 3rd SO ESC meeting at the end of November/December in back-to back with the GC ESC meeting.