2nd ENTSO-E Public workshop on Network Code on Emergency and Restoration

Date: 12 November 2014
Time: 13h00 – 17h30
Place: ENTSO-E premises, Brussels

MINUTES

Programme:

No	Subject	Time	Lead
1.	**Registration and lunch**	12:00-13-00	
2.	**Introduction and network codes status** Q & A	13:00-13:15	**Konstantin Staschus** *ENTSO-E Secretary-General* Workshop participants
3.	**Major improvements in NC ER** Roundtable organisation	13:15-13:45	**Laurent Lamy** *ENTSO-E Convenor of NC ER Drafting Team*
4.	**Round tables – session 1** Q & A	13:50-14:25	NC ER Drafting Team members Workshop participants
5.	**Round tables – session 2** Q & A	14:30-15:05	NC ER Drafting Team members Workshop participants
6.	**Coffee break**	15:05-15:15	all
7.	**Round tables – session 3** Q & A	15:15-15:50	NC ER Drafting Team members Workshop participants
8.	**Round tables – session 4** Q & A	15:55-16:30	NC ER Drafting Team members Workshop participants
9.	**Conclusion** Summary of workshop	16:35-17:30	**Geoffrey Feasey** *ENTSO-E Corporate Affairs Manager* **Laurent Lamy** *ENTSO-E Convenor of NC ER Drafting Team*
10.	**End of Workshop**	17:30	

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1. Welcome, Introduction and code process status

The ENTSO-E secretary general Konstantin Staschus welcomed the participants and presented the current status of all ENTSO-E network codes. Mr Staschus stressed the importance of ENTSO-E commitment to close collaboration with stakeholders during the drafting process of NC ER and in the later stage by creating a European stakeholder committee with ACER. Also the latest status of guidelines vs. network codes was summarized to the participants.

2. Major improvements in the code

The convener of the Drafting Team for NC ER, Laurent Lamy, presented the latest improvements in the code compared to the previous release from June. Drafting team considered stakeholders' comments from the first workshop and integrated them into the code. In general all the chapters have been elaborated and significantly extended and new Market interaction chapter introduced. Great effort was made to ensure better consistency of requirements and to avoid redundant provisions with other NCs.

3. Round tables session

Main concerns on System Defence Plan chapter

Significant Grid Users in NC ER

Commented/question raised by: EUGINE, SEDC

Comment/question: NC RfG applies only to new installations, but NC ER applies also to the existing ones?

Drafting team answer: Design of system defence plans is developed at the national level, where you need to take into account the facilities and actors connected to the grid. This mean that existing power plants should be taken into account in the design of System Defence plan as well.

Comment/question: Regarding the SGU definition that has been elaborated compared to the previous release of the code, are household consumers considered in the Demand Side Response, and is there a distinction between small and large consumers in NC ER?

Drafting team answer: The SGU definition with regards to consumption is however the same as in the DCC and regards generation in NC RfG.

Comment/question: The code has two groups, SGU and generators, so the groups include households as well. Drafting team should be aware that with such a provision also households are addressed. It is important for small business to have a choice if they want to be included in such a plans or not.

Drafting team answer: This is supposed to be covered by Article 8(5), where the idea is that the TSO identifies SGUs with active role for defence and restoration plans.

Comment/question: For the household SGUs it is impossible to give an active power set point and expect them to obey it. Should at least be done through the DSOs or the aggregator.

Drafting team answer: Drafting team takes note and will take the comment into account.

Assistance for active power

Commented/question raised by: ACER

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Comment/question: Assistance for active power in Article 18; within which transmission capacities will this assistance take place, TRM or capacity available for the market? Which capacities will be used in case of flow-based approach?

Drafting team answer: The idea is that all of the available physical capacity will be utilized. Will be specified more in details in the next published version of the code. Operational security limits must be respected.

DC interconnectors to be addressed

Commented/question raised by: BritNed

Comment/question: Article 11(2 & 3) should be also DC interconnectors addressed apart from the AC.

Drafting team answer: In the next version this is to be taken into account.

Consideration of CRM provision

Commented/question raised by: EURELECTRIC

Comment/question: In article 11 we propose you consider to include CRM provisions as discussed in different countries at the moment. We think if this is not included then the capacity is not safe.

Drafting team answer: We take the note and we will consider the proposal.

Procurement arrangements

Commented/question raised by: SSE

Comment/question: Are procurement arrangements of the services covered in the code - Article 9. Is it mandatory arrangement for SGU? Where are the procurement arrangements regarding the services provided by SGUs? On page 1, point 6.b it says that some services will be procured, but there is nothing about money anywhere else

Drafting team answer: Implementation phase includes the procurement of services, to be achieved according to national rules and organisation in each Member State.

The right of appeal

Commented/question raised by: SSE

Comment/question: In article 9(3) there is no the right of appeal mentioned for SGUs and type A generators about the measures to be implemented by the SGU? In some other codes a right to appeal is mentioned.

Drafting team answer: The requirement applies only to relevant SGU and type A PGMs. In A8 (5) there is a notification to SGUs and DSOs which are relevant and are identified as relevant.

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Main concerns on Restoration plan chapter

Minimum duration of backup power supply

Comment/question: For nuclear power plants, 24 hours would be a maximum duration until they have external power again. Nuclear regulators might want to amend this, so that 24 hours would be a maximum time for restoring power to nuclear Power Generating Modules, because after that time special protection schemes would have to be applied that might make a complete inspection necessary before powering up again.

Drafting team answer: This kind of need will be covered by the reference to "High Priority Grid User" needs in the design phase of Restoration plan (article 20.2 b)

Coordination / consultation process

Comment/question: Art. 20(1): Restoration coordination between TSOs, DSOs, Power Generating Modules, and Significant Grid Users appears to be poorly described in the code. It should not only be consultation, but coordination.
Drafting team answer: see answer below related to coordination / consultation.

NRA approval

Comment/question: NRA should approve the restoration plan in Article 5(2):.

Drafting team answer: This differs in national legislation, therefore cannot be formulated any stricter.

Comment/question: In Article 21(1) the wording "to make the restoration plan available" is not clear enough. Available to to whom exactly?

Drafting team answer: It should be at least the NRA, and involved parties (DSO, PGM, TSO, SGU).

Frequency leader

Who is addressed in Article 26(3) and 27 as frequency leader? Isn't this a PGM?

Drafting team answer: No, this is the TSO, fully acknowledging that the TSO might have to instruct a PGM to keep the frequency. Constant communication on technical feasibility and new instructions is of course necessary.

Main concerns on Information / Communication and Compliance / Testing chapters

Testing of house load operations

Commented/question raised by: Maljac Hervé, EUR

Question: Chapter 6 - house load operations. It could be very difficult to test always as stated currently in Article 41.2.

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The effects might be not positive when we are going to test big Power Generating Module. This type of tests could jeopardize the stability of the System

Drafting team answer: As stated in article 40(3), the tests shall not endanger Operation Security. By the way, such tests are already current practices in some countries.

Recovery of costs

Commented/question raised by: Maljac Hervé, EUR

Question: Compliance and Review: Recovery of cost is missing for the tests.

Drafting team answer: This is covered by Article 4.

Communication between aggregator of type A and TSO

Commented/question raised by: Eloisa Porras, Endesa S.A.

Question: Article 37 (1b): in case of use the Aggregator, who is the responsible to send the information? The reference to Aggregator of type A only appear in this chapter. Are we going to request information from type A Power Generating Modules?

Drafting team answer: Reference to aggregator will be further developed.

Compliance testing of households

Question: Article 42(1 and 2), Demand Facility providing Demand Side Response means also households! How can households be physically tested?

Drafting team answer: Households inclusion has to be investigated

Comment: Testing/ review should be done by an independent party and not by the TSOs themselves.

Double communication channels

Commented/question raised by: CECED

Question: Only Blackstart capable generation units have double link of communication channels in Belgium. Why do we want to have this double communication channels with the rest of the SGU? Who will finance the implementation? In our view this is disadvantage / discrimination for these SGUs identified to provide services if costs need to be covered by themselves.

Drafting team answer: This needs to be further investigated.

Periodicity of relays testing

Commented/question raised by: RWE Deutschland AG

Comment: Article 44. No tests are needed. DSO are responsible of maintenance and liability of these relays.

Suggestion:

- Periodicity of 8 years.

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- Delete the frequency of the test and add “by his own responsibility”

Comment/question: Article 44. It´s missing TSO, in some countries LFDD relays are in the Transmission Network as well.

Drafting team answer: This remark will be taken into account.

Main concerns on Market Interaction and General Provisions chapters

Consultation process, especially in design phase. Derogation principle
Commented/question raised by: SEDC ; EDF

Comment/question:

- Can a TSO impose a Significant Grid User to participate, if considered as economically efficient for the TSO? What is the protection for the SGU that cannot participate? No “voluntary” basis participation.
- Consultation process: risky process from Significant Grid User and DSO point of view. No NRA involvement.

Drafting team answer:

The consultation process has been developed to address a matter of responsibility. In some situations, we need to make sure some entity to make a final decision (design phase for instance). However, it is not of TSO interest to require measures that cannot be implemented (technically or costly), due to the risk of not having this measure at disposal when needed. Then the TSO will be claimed, according to each national in law, for having designed and requested something that is not applicable.

In case of no agreement is reached between parties: EU and national lows apply: “usual” grid user claim. If “derogation article” is going out from discussions with EC, it will be added in the NC ER.

Regulatory aspects
Commented/question raised by: ACER; EUR

Comment/question: Article 3 – Regulatory aspects.

Which processes are concerned? How to take into account existing (national) rights of NRA of these cases?

Drafting team answer: This is a general issue, discussed with European Commission on other NC. The NC ER will be aligned with others NC.

Duplication of communication links
Commented/question raised by: SEDC

Comment/question: Duplication of links with the Significant Grid Users

Drafting team answer: NC ER is aligned in this with NC OS. Pending discussions on this in pre-Comitology.

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Recovery of costs

Commented/question raised by: EUR; ENDESA; GDFSUEZ

Comment/question: Recovery of costs: nothing for the Significant Grid Users that are not "regulated Network Operators". Risk of discrimination between generators participating / not participating if associated costs are not covered at all.

Drafting team answer: All costs of regulated operators have to be covered by tariff NRA. Significant Grid Users have costs, they have to apply on their price, and by contract (part of ancillary services). Anyway, this needs to be further investigated

4. Conclusion - Summary of the main issues discussed during the workshop

After a global synthesis of main elements expressed during round table sessions, Geoffrey Feasey, ENTSO-E Corporate Affairs Manager, offered the participants to express items that still need to be included/resolved in the network code. Main items raised are:

- Procurement of services are not mentioned anywhere in the code.
- SEDC proposes not to take into account every household in the provisions.
- System Defence plan and Restoration plan are not considered to be approved by NRAs in the current draft.

ENTSO-E takes remarks into consideration, and to conclude, thanked all attendees for their active participation during this workshop.

NEXT STEPS

After an extensive work in collaboration with stakeholders, the NC ER drafting team rewrote two sections of the network code: the chapter on market interactions and the article concerning the automatic low Frequency control scheme, which has been completed based on an internal study on Low Frequency Demand Disconnection (LFDD) performed by TSOs experts.

To gain further input and proposals from all interested parties on these two specific topics:

- a third Public Stakeholder Workshop will be held on 8 January 2015;
- a Public Consultation will run from 15 December 2014 until 14 January 2015.

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