

ENTSO-E views on Regional Coordination: enhancing the RSC model

The legislative proposals in the Clean Energy Package (CEP) introduce new requirements for regional cooperation at TSO level as well as, to a certain extent, at regulatory and institutional level between NRAs and Member States.

Coordination between TSOs at regional, synchronous area and pan-EU level has historically been developed in a proactive and successful way by TSOs. In this regard, TSOs and ENTSO-E are convinced of the benefits of Network Codes and Guidelines recently published and under implementation. These Network Codes and Guidelines formalize an ambitious, flexible and forward-looking framework for coordinating operational planning with the support of Regional Security Coordinators (RSCs). ENTSO-E considers CEP an opportunity to further enhance the wider framework by involving the NRAs and Member States in supporting regional coordination, promoting agreements on non-technical aspects that are necessary for the effectiveness of the coordination at TSO level.

ENTSO-E strongly aligns with the Council proposals as approved in its General Approach since it recognises the role of the TSO, ENTSO-E and RSC appropriately in Regional Coordination. Further to this, the Council recognises the framework for evolution of the Regional Coordination model is through the Network Codes. ENTSO-E now provides further advice for further improving the regulatory proposals with regard to regional coordination:

TSOs responsible for taking decisions (Electricity Regulation Article 38)

The decision-making process as described in CACM GL and SOGL should be preserved, since it is consistent with the role of the TSOs to efficiently operate and facilitate coordination with other TSOs as described in the national and European legal framework, in particular in the electricity Directive.

In this sense, ENTSO-E is aligned with the Council proposal that clarifies that ‘coordinated actions’, which are derived in operational planning timeframes, will be proposed by RSCs in line with regional procedures developed by TSOs. In our view, the regional procedure to set up and review ‘coordinated actions’ should be transparently established and approved by NRAs in the region.

These procedures should include, as main criteria, the possibility for TSOs to deviate from previously prepared ‘coordinated actions’ in order to ensure system security and also to gain efficiency. In consequence, this procedure would include the following:

- 1) TSOs can deviate from previously established ‘coordinated actions’ if:
 - the coordinated action negatively affects operational security: by risking operational security limits or by risking a lack of available connected resources to ensure generation-demand adequacy;
 - if a more effective and efficient (cheaper) solution is identified by TSOs at the time of activation.
- 2) In addition, in the case where considering the review of remedial actions that had been set up in previous timeframes, the main criteria to be applied is that those remedial actions shall remain if they are still available and necessary to ensure operational security and if no other alternative coordinated action that increases the security of supply or implies lower costs can be found.

Technical consistency check of the proposed list of services (Electricity Regulation Article 34)

ENTSO-E supports the approach of enhancing regional cooperation with additional services, when: (i) they are implemented as services, in line with the decision-making scheme established in the RSC framework as per SOGL and (ii) their efficiency and benefits to the consumer are properly assessed at the relevant geographical level. ENTSO-E supports the Council proposal and additionally suggests the following changes:

- Eliminate services “e” (support to restoration) and align accordingly points 8.3 and 8.4 of Annex I since this is role of the TSO and roles should not be blurred as previously mentioned.

- Adjust services “n” and ‘p’ in the Council General Approach, to ensure consistency with the Council General Approach on the Risk Preparedness Regulation.
- Adjust description of service “q” to ensure consistency with article 21(6).
- Adjust Annex I in point 12 (optimization of inter-TSO compensation mechanism), in accordance with Article 34, by removing this service; and in points 9.1 and 13.2, by clarifying the supportive role of RSCs.

Finally, ENTSO-E emphasizes that the model for Regional Cooperation provides for the flexible evolution of services, in meeting the operational needs in a way that is cost-efficient and beneficial for consumers.

Oversight of coordination entities

In line with the System Operations Guideline, the RSCs have obligations to provide ENTSO-E with information regarding their processes and their coordination. This is included in an ENTSO-E monitoring report to ACER on Regional Coordination. This process ensures the transparent monitoring of Regional Coordination at EU level by ENTSO-E and ACER. ACER’s role is relevant in overseeing regional coordination performance from a pan-European perspective.

ENTSO-E supports the view that there needs to be sufficient oversight of regional coordination as explained above. However, as RSCs are providers of coordination services to TSOs, the oversight should be placed on the TSOs directly. The appropriate model for the oversight is therefore through the NRA oversight of TSOs. ENTSO-E recommends that further enhancements of reporting, consultation and oversight of Regional Coordination shall be established between NRAs and TSOs.

These criteria are relevant when amending articles 32, 37 and 43 of IEM Regulation and article 62 of IEM Directive.

Geographical scope of coordination entities (Electricity Regulation Article 33)

ENTSO-E supports the Council recognition of the need for continuity in the efforts taken to implement RSCs pursuant to SOGL. Whilst the SOGL promotes flexibility which is needed for handling the complexity and scope, the RSCs and TSOs are ensuring consistent procedures within a region and between regions. Therefore, there is no valid requirement for a rigid assignment of RSCs to capacity calculation regions: For example, the size of large, complex regions such as CORE makes it sensible to have the coordination of security assessment between two RSCs. Indeed, the EU target model foresees the merging of the different CCRs. If RSCs have to cover at least one CCR, they would have to merge when CCRs merge, leading to less and less RSCs having to cover a huge geographical scope. Each merging would lead to major technical difficulties, loss of expertise, administrative burden and create uncertainties.

In line with the SOGL, the NRAs are already required to approve the TSOs’ proposal when establishing RSCs. Article 32 of Electricity Regulation introduces requirements towards NRAs to review (in the Parliament text) the arrangements established by TSOs and RSCs to perform the cooperation. Requirements in Article 32 for NRAs to review (not to re-approve) the proposals establishing the RSCs are considered proportionate, in order to avoid doubling the steps already undertaken in SOGL implementation.

ENTSO-E has integrated in the table in annex the detailed proposal in line with the above arguments. ENTSO-E remains at entire disposal for any additional information in order to find the best proposal on this and other subjects.

ENTSO-E proposals for adjustments on Regional Cooperation

1) A fit-for-purpose and flexible regulation and decision-making framework respecting TSOs' liability for system security:

The main instrument to drive further regional TSO cooperation are and should be the Network Codes and Guidelines that have recently been adopted and are presently in implementation. These Guidelines formalise an ambitious, flexible and forward-looking framework for coordinating operational planning with the support of Regional Security Coordinators (RSCs). It is of utmost importance that decision-making processes, as they are presently defined in the CACM and System Operation Guidelines (SOGL) are maintained and are not blurred across different entities. TSOs are ultimately responsible and liable for system security, and their ability to fulfil this responsibility must be fully upheld. In this regard, ENTSO-E supports the Council's proposal for *Coordinated Actions* of TSOs, which are understood as actions set up by RSCs under the procedures agreed with NRAs in the corresponding region, while we propose some adjustments for such procedures in Articles 38 and 39 in order to provide streamlined criteria for effective and efficient processes as follows:

COMMISSION PROPOSAL	EP PLENARY TEXT	COUNCIL GENERAL APPROACH	Compromise proposals
<p style="text-align: center;"><i>Article 38</i></p> <p style="text-align: center;"><i>Adoption of decisions and recommendations</i></p>	<p>AM 142</p> <p>Article 38 – title</p> <p>Adoption <i>and revisions</i> of decisions and recommendations</p>	<p style="text-align: center;"><i>Article 38</i></p> <p style="text-align: center;"><i>[] Coordinated actions and recommendations</i></p>	
<p>1. Regional operational centres shall develop a procedure for the adoption of decisions and recommendations.</p>	<p>AM 143</p> <p>1. <i>The transmission system operators of each regional coordination centre</i> shall develop <i>procedures</i> for the adoption <i>and revision</i> of decisions and recommendations <i>that ensures geographically balanced representation and equitable treatment of members of the regional coordination centre.</i></p>	<p>1. [] The transmission system operators of a system operation region shall develop a procedure for the adoption of [] coordinated actions and recommendations put forward by Regional Security Coordinators in accordance with the criteria set out in paragraphs 2 to 4.</p>	<p>ENTSO-E supports the Council text proposal, which recognizes TSOs' liability for the secure operation of their power systems clarifies the role of RSCs to provide support services to TSOs but without imposing binding decisions on them.</p> <p>The following adjustments are required in order to:</p> <ul style="list-style-type: none"> a) ensure consistency with adjustments in article 35 and 39; b) avoid unnecessary procedures in small capacity calculation regions served by a RSC coordinating in larger regions (in consistency with amendments in article 33):

			<p>[] The transmission system operators of a system operation region shall develop a procedure for the adoption <u>and revision</u> of [] coordinated actions and recommendations put forward by Regional Security Coordinators in accordance with the criteria set out in paragraphs 2 to 4.</p> <p><u>Where the system operation region encompasses more than a capacity calculation region area, the procedure may be particularized for each CCRs.</u></p>
<p>2. Regional operational centres shall adopt binding decisions addressed to the transmission system operators in respect of the functions referred to in points (a), (b), (g) and (q) of Article 34(1). Transmission system operators shall implement the binding decisions issued by the regional operational centres except in cases when the safety of the system will be negatively affected.</p>	<p>AM 144</p> <p>2. Regional <i>coordination</i> centres shall adopt binding decisions addressed to the transmission system operators in respect of the functions referred to in (a) <i>and (b)</i> of Article 34(1). Transmission system operators shall implement the binding decisions issued by the regional <i>coordination</i> centres except in cases <i>where the implementation of the decision would result in a violation of operational security limits defined by each transmission system operator pursuant to Article 25 of Commission Regulation (EU) 2017/1485.</i></p>	<p>2. [] Regional Security Coordinators shall [] set-out coordinated actions addressed to the transmission system operators in respect of the [] tasks referred to in points (a) and (b), [] of Article 34(1). Transmission system operators may decide not to [] implement the coordinated actions [] issued by the [] Regional Security Coordinators where the implementation of the coordinated actions would result in a violation of the operational security limits defined by each transmission system operator in accordance with [] the System Operation Guideline adopted on the basis of Article 18 of Regulation 714/2009.</p>	<p>The Council text is supported.</p> <p>The following adjustments are required, in order to adjust the conditions for TSOs to deviate from previously established coordinated actions to the system operation needs, since:</p> <p>1) the reference to violation of operational security limits can be too narrow and other concerns related to the lack of adequacy (art 107 of SOGL) or dynamic stability could apply for reviewing previously established coordinated actions. Therefore, a more general text referring to “risk in operational security” is preferred. It is essential to amend the text so that it refers to the alert state (e.g. SO GL Article 18(2)) rather than to the violation of the operational security limits (e.g. SO GL Article 25).</p> <p>2) the remedial action is set up in line with the regional procedures in the operational planning timeframe. Later to that, the conditions could have evolved and those remedial actions could be ineffective or not</p>

			<p>available any longer; therefore ENTSO-E advises that the text recognizes enough flexibility to deviate from inefficient remedial actions.</p> <p>Art. 38(2). Regional Security Coordinators shall set-out coordinated actions addressed to the transmission system operators in respect of the tasks referred to in points (a) and (b) of Article 34(1). Transmission system operators may decide not to implement the coordinated actions issued by the Regional Security Coordinators where the implementation of the coordinated actions would result in a violation of the operational security limits defined by each transmission system operator or put at risk operational security in accordance with the System operation Guideline adopted on the basis of Article 18 of Regulation 714/2009 or if, due to a change in system conditions since the previous timeframe, the proposed action:</p> <p>a) is not available any longer or would not be effective;</p> <p>b) can be replaced with a more effective solution identified by transmission system operators.</p>
	<p>AM 148 Article 38 – paragraph 3 c (new) 3 c. Where the measure subject to revision is a binding decision in accordance with Article 38(2) of this Regulation, the request for revision shall not suspend the decision except in cases where the implementation of the decision</p>		<p>The EP text should be amended in line with Council text for article 39(3), in order to make it consistent with the liability scheme (coordination entities as service providers) in article 38 and also to ensure the necessary sustainability of the capacity calculation process, where the agreed ex-ante remedial actions should be maintained</p>

	<i>would result in a violation of operational security limits defined by each transmission system operator pursuant to Article 25 of the System Operation guidelines.</i>		if they are still needed, available or if there is no other effective and efficient alternative: <i>Art 39(3)(c) Where the measure subject to revision is a coordinated action in accordance with Article 38(2) and the adopted coordinated action is still available and necessary to keep operational security and no alternative coordinated action that increases the operational security or implies lower costs can be found, the request for revision shall not suspend the coordinated action. in cases [] where the implementation of the coordinated actions would result in a violation of the operational security limits defined by each transmission system operator in accordance with Article 25 of [Commission Regulation XXX establishing a guideline on electricity transmission system operation.</i>
<i>Article 39 Revision of decisions and recommendations</i>	AM 150 deleted	<i>Article 39 Revision of [] coordinated actions and recommendations</i>	EP amendments are supported.
1. Regional operational centres shall develop a procedure for the revision of decisions and recommendations.		1. [] Regional Security Coordinators shall develop a procedure for the revision of [] coordinated actions and recommendations referred to tasks described in Article 34.	Regulation should preferably state the requirement for a single procedure to include how the proposals from RSCs are adopted and reviewed by TSOs. In order to simplify regulatory requirements, details should be left to the procedures themselves, which must be approved by the relevant regulatory authorities.
2. The procedure shall be triggered at the request of one or more of the transmission system operators of the system operation region. Following the revision of the decision or recommendation, regional operational		2. The procedure shall be triggered at the request of one or more of the transmission system operators of the system operation region. Following the revision of the [] coordinated action or recommendation, [] Regional Security	Ensure alignment between Council and EP amendments as above on Article 38 – paragraph 3 b (new)

centres shall confirm or modify the measure.		Coordinators [+] shall confirm or modify the measure.	
3. Where the measure subject to revision is a binding decision in accordance with Article 38(2), the request for revision shall not suspend the decision except in cases when the safety of the system will be negatively affected.		3. Where the measure subject to revision is a [] coordinated action in accordance with Article 38(2), the request for revision shall not suspend the [] coordinated action except in cases [] where the implementation of the coordinated actions would result in a violation of the operational security limits defined by each transmission system operator in accordance with the System Operation Guideline adopted on the basis of Article 18 of Regulation 714/2009	Ensure alignment between Council and EP amendments as above on Article 38 – paragraph 3 c (new)
4. Where the measure subject to revision is a recommendation in accordance with Article 38(3) and following its revision a transmission system operator decides to deviate from the recommendation, the transmission system operator shall submit a detailed justification to the regional operational centre and to the other transmission system operators of the system operation region.		4. Where following the [] revision [] of the recommendation in accordance with Article 38([] 3) [] a transmission system operator decides to deviate from the recommendation, the transmission system operator shall submit a [] justification to the [] Regional Security Coordinators and to the other transmission system operators of the system operation region.	Council text is supported as part of the criteria for the regional procedures to set up and review coordinated actions in article 38.

2) Governance of regional cooperation: the following compromise proposals aim to ensure a governance framework for regional cooperation which is consistent with the roles of NRAs, MSs, TSOs and RSCs as established in the EU Treaties and other relevant regulation:

COMMISSION PROPOSAL	EP PLENARY TEXT	COUNCIL GENERAL APPROACH	Compromise proposals
<p><i>Article 32</i> <i>Establishment and mission of regional operational centres</i></p>		<p><i>Article 32</i> <i>Establishment and mission of [] Regional Security Coordinators</i></p>	
<p>1. By [OP: twelve months after entry into force], all transmission system operators shall establish regional operational centres in accordance with the criteria set out in this chapter. Regional operational centres shall be established in the territory of one of the Member States of the region where it will operate.</p>	<p>AM 126</p> <p>1. By [OP: twelve months after entry into force], <i>regional coordination centres shall in addition to other tasks that are laid out in Article 34 of this Regulation, replace and cover the functions of regional security coordinators established in accordance with the Regulation...[the Commission Regulation establishing a guideline on Electricity Transmission System Operation] pursuant to the criteria set out in this chapter.</i></p> <p>[...]</p> <p><i>All transmission system operators of a system operation region shall submit to the regulatory authorities of the system operation region for a review a proposal for the establishment of regional coordination centres in accordance with the criteria set out in this chapter.</i></p>	<p>1. By [OP: twelve months after entry into force], all transmission system operators of a [] system operation region shall submit a proposal for the enhancement of Regional Security Coordinators established pursuant to the System Operation Guideline adopted on the basis of Article 18 of Regulation 714/2009 for approval by the respective regulatory authorities.</p>	<p>ENTSO-E supports the Council proposal, which aligns with the efforts already undertaken during the implementation of SOGLs, building up on the new requirements established in CEP.</p> <p>Additionally, ENTSO-E supports full transparency of TSO-RSC arrangements towards regulatory authorities, but nevertheless signalizes that RSCs will be already established (therefore statutes and rules of procedure already registered) by the time the CEP enters into force. Therefore, we suggest TSOs to send the listed information to NRAs for their review (as indicated by Parliament), which is also in line with governance principles in which NRAs shall monitor the performance of the regional coordination but not being involved in internal decisions as budget, or details on internal arrangements (arm's length principle observed).</p> <p>1. By [OP: twelve months after entry into force], all transmission system operators of a system operation region shall [] submit a proposal for the [] enhancement of Regional Security Coordinators established pursuant to [] the System Operation Guideline adopted on the basis</p>

			of Article 18 of Regulation 714/2009 for a review by the respective regulatory authorities.
<i>Article 34</i> <i>Tasks of regional operational centres</i>	AM 132 Article 34 – title Tasks of regional <i>coordination</i> centres	<i>Article 34</i> <i>Tasks of [] Regional Security Coordinators</i>	Supports Council text. Adjustments as recommended below.
2. The Commission may add other functions to the regional operational centres, not involving decision making power, pursuant to Chapter VII of this Regulation.	AM 134 2. The Commission may add other functions to the regional <i>coordination</i> centres, not involving decision making power, pursuant to Chapter VII of this Regulation.	2. [] Upon joint proposal of regulatory authorities, following consultation with the transmission system operators and the Regional Security Coordinators, the Member States of the system operation region may jointly decide to provide for additional advisory coordination tasks, on the basis of which Regional Security Coordinators will issue recommendations pursuant to Article 38. In such instance, Regional Security Coordinators shall execute those tasks on the basis of the methodologies drafted by transmission system operators and agreed by the relevant regulatory authorities.	ENTSO-E considers the TSOs in the region are the ones to be consulted by MS in order to advise for additional advisory tasks coordinated by RSCs. Therefore, the next adjustment is suggested: 2. Upon joint proposal of regulatory authorities, following consultation with the transmission system operators and the Regional Security Coordinators , the Member States of the system operation region may jointly decide to provide for additional advisory coordination tasks, on the basis of which Regional Security Coordinators will issue recommendations pursuant to Article 38.
<i>Article 43</i> <i>Monitoring and reporting</i>			
1. Regional operational centres shall establish a process for the continuous monitoring of at least:	AM 160 1. Regional <i>coordination</i> centres shall establish a process for the continuous monitoring of at least:	1. [] Regional Security Coordinators shall establish a process for the continuous monitoring of at least:	Council text for art. 43(1) is supported.
2. Regional operational centres shall submit to the Agency and to the regulatory authorities of the system operation region the data resulting from their continuous monitoring at least annually.	AM 161 deleted	2. [] Regional Security Coordinators shall submit to the Agency [] to the regulatory authorities and to the transmission system operators of the system operation region the data resulting from their continuous monitoring at least annually.	EP text is supported. Requirements in paragraph 43(2), 43(4) and to some extent 43(5) are redundant, as amended through the EP proposal for removal. 43(2) deleted

4. Regional operational centres shall submit an annual report concerning their performance to ENTSO for Electricity, the Agency, the regulatory authorities of the system operation region and the Electricity Coordination Group established pursuant to Article 1 of Commission Decision 2012/C 353/02 ¹ .	AM 163 4. Regional <i>coordination</i> centres shall submit an annual report <i>containing relevant monitoring data pursuant to paragraph 1 of this Article and information on</i> their performance to ENTSO for Electricity, the Agency, the regulatory authorities of the system operation region and the Electricity Coordination Group established pursuant to Article 1 of Commission Decision 2012/C 353/02.	4. [] Regional Security Coordinators shall submit an annual report concerning their performance to ENTSO for Electricity, the Agency, the regulatory authorities of the system operation region and the Electricity Coordination Group established pursuant to Article 1 of Commission Decision 2012/C 353/02 ² .	ENTSO-E supports this amendment which aligns the Regulation with the SOGL obligations and ensures transparency. ENTSO-E recommends that the requirements for yearly reporting of regional coordination performance to the relevant institutions are streamlined through a single paragraph, in line with SOGL requirements: 43(4) Regional Security Coordinators shall submit an annual report <i>containing relevant monitoring data pursuant to paragraph 1, in line with requirements in article 17 of Commission Regulation 2017/1485 establishing a guideline on electricity transmission system operation concerning their performance</i> to ENTSO for Electricity. <i>The ENTSO for Electricity shall publish an annual report on regional coordination, including possible shortcomings identified in the inter-regional coordination that will be available to</i> the Agency, the regulatory authorities of the system operation region and the Electricity Coordination Group established pursuant to Article 1 of Commission Decision 2012/C 353/02.
5. Regional operational centres shall report shortcomings identified in the monitoring process under paragraph 1 to ENTSO for electricity, the regulatory authorities of the system operation region,	AM 164 5. Regional <i>coordination</i> centres shall report shortcomings identified in the monitoring process under paragraph 1 to ENTSO for electricity, the regulatory	5. [] Regional Security Coordinators shall report shortcomings identified in the monitoring process under paragraph 1 to ENTSO for electricity, the regulatory authorities of the region the	Possible shortcomings found by RSCs and TSOs in coordinating operational planning within regions shall be reported to the MSs and the NRAs of the region in line with regional coordination governance

¹ Commission Decision of 15 November 2012 setting up the Electricity Coordination Group (OJ C 353, 17.11.2012, p.2).

² Commission Decision of 15 November 2012 setting up the Electricity Coordination Group (OJ C 353, 17.11.2012, p.2).

the Agency and the competent authorities of Member States responsible for the prevention and management of crisis situations.	authorities of the system operation region, the Agency and the competent authorities of Member States responsible for the prevention and management of crisis situations.	Agency and the competent authorities of Member States responsible for the prevention and management of crisis situations. Following this report, the regulatory authorities of the region may propose to the Regional Security Coordinators measures to address the shortcomings.	established as per the SOGL. Therefore, the Council text requires the following adjustments: 5.[] Regional Security Coordinators shall support transmission system operators in reporting shortcomings identified in the monitoring process under paragraph 1 [...], the regulatory authorities of the region [...] and the competent authorities of Member States responsible for the prevention and management of crisis situations, <i>as well as, as convenient to ENTSO for electricity and the Agency.</i> Following this report, the regulatory authorities of the region may propose to the Regional Security Coordinators measures to address the shortcomings.
	AM 165 Article 43 – paragraph 5 a (new) <i>5 a. Without prejudice to the principle of confidentiality and the need to preserve security and commercially sensitive information regional coordination centres shall make public the reports referred to in paragraphs 4 and 5.</i>		The Parliament proposal for Art. 43(5a) is already covered by Art 17(1) of SOGL; therefore, it is not necessary to duplicate it.

3) Removal of requirements to implement coordination services by RSCs which have a direct impact on real-time system operation:

<i>Article 34</i> <i>Tasks of regional operational centres</i>	AM 132 Article 34 – title Tasks of regional <i>coordination</i> centres	<i>Article 34</i> <i>Tasks of [] Regional Security Coordinators</i>	Supports Council text. Adjustments as commented below
1. Each regional operational centre shall perform all the following functions in the system operation region where it is established and regional operational	AM 133 1. Each regional <i>coordination</i> centre shall perform all the following functions in the system operation region where it is	1. Each Regional [] security coordinator shall perform [] the following [] tasks of regional relevance for transmission system operators in the	ENTSO-E supports the Council text. The Council amendments allow for an evolutionary approach in which

centres shall perform at least the following functions, set out in more detail in Annex I:	established and regional coordination centres shall perform at least the following functions, set out in more detail in Annex I:	system operation region [] set out in more detail in Annex I:	coordination services are developed in accordance with the regional needs and when they add value to the operational planning process.
(e) coordination and optimization of regional restoration;		(e) support the coordination and optimization of regional restoration as requested by transmission system operators ;	<p>ENTSO-E recommends to remove service “e”:</p> <p>(e) support the coordination and optimization of regional restoration as requested by transmission system operators</p> <p>The restoration of the system after blackout or system split is a real-time function carried out by TSOs, and requires experience in real time operation as well as real-time measures. In such situations, operators need to take actions in a very short timeframe to coordinate and reestablish the re-synchronisation process, which technically allows only limited time to coordinate with the relevant parties impacted. RSC support in this situation does not introduce any added value and could even be counterproductive. All institutions have correctly recognised that “the tasks carried out by Regional Security Coordinators should exclude real time operation of the electricity system.” Therefore, this service should be removed from the list of RSC tasks.</p>

4) FURTHER PROPOSALS FOR ADJUSTMENTS TO ENSURE CONSISTENCY AND QUALITY OF LEGISLATIVE TEXTS

COMMISSION PROPOSAL	EP PLENARY TEXT	COUNCIL GENERAL APPROACH	Compromise proposals
Article 31			

<i>Regional cooperation of transmission system operators</i>			
3. For the purposes of achieving the goals set in paragraphs 1 and 2 of this Article, the geographical area covered by each regional cooperation structure may be defined by the Commission, taking into account existing regional cooperation structures. Each Member State shall be allowed to promote cooperation in more than one geographical area. The Commission is empowered to adopt delegated acts in accordance with Article 63 concerning the geographical area covered by each regional cooperation structure. For that purpose, the Commission shall consult the Agency and the ENTSO for Electricity.	AM 125 3. For the purposes of achieving the goals set in paragraphs 1 and 2 of this Article, the geographical area covered by each regional cooperation structure may be defined by the Commission, taking into account existing regional cooperation structures. Each Member State shall be allowed to promote cooperation in more than one geographical area. The Commission is empowered to adopt delegated acts in accordance with Article 63 concerning the geographical area covered by each regional cooperation structure. For that purpose, the Commission shall consult the <i>regulatory authorities, the</i> Agency and the ENTSO for Electricity.	3. For the purposes of achieving the goals set in paragraphs 1 and 2 of this Article, the geographical area covered by each regional cooperation structure may be defined by the Commission, taking into account existing regional cooperation structures. Each Member State shall be allowed to promote cooperation in more than one geographical area. □The Commission is empowered to adopt [] implementing acts in accordance with Article [] 62(2) concerning the geographical area covered by each regional cooperation structure. The decisions and empowerment referred to in this paragraph are without prejudice to Article 33 and shall be subject to consultations. For that purpose, the Commission shall consult the Agency and the ENTSO for Electricity.	ENTSO-E supports the Council proposal, and recommends adjusting the paragraph to align with the Parliament amendment for article 31(3), by inserting a consultation with the NRAs of the MSs involved, as follows: 31(3) [...]For that purpose, the Commission shall consult the <i>regulatory authorities of involved Member States</i> , the Agency and the ENTSO for Electricity.
<i>Article 32</i> <i>Establishment and mission of regional operational centres</i>		<i>Article 32</i> <i>Establishment and mission of []</i> <i>Regional Security Coordinators</i>	
	<i>The proposals referred to the forth subparagraph shall include the following information:</i>	The proposal shall contain the following elements:	
	<i>(b) the organisational, financial and operational arrangements necessary to ensure the efficient, secure and reliable operation of the interconnected transmission system;</i>	b) the organisational, financial and operational arrangements necessary to ensure the efficient, secure and reliable operation of the interconnected transmission system;	ENTSO-E suggests to adapt paragraph 32(1)(b) to the role of the RSCs. b) the organisational, financial and operational arrangements necessary to ensure the efficient, secure and reliable <i>performance of the services described in Article 34;</i>
Article 33 <i>Geographical scope of regional operational centres</i>	AM 130 Article 33 – title Geographical scope of regional <i>coordination</i> centres	<i>Article 33</i> <i>Geographical scope of [] Regional Security Coordinators</i>	

2. Within three months of receipt, the Agency shall either approve the proposal defining the system operation regions or propose amendments. In the latter case, the Agency shall consult the ENTSO for Electricity before adopting the amendments. The adopted proposal shall be published on the Agency's website.		2. Within three months of receipt of the proposal in paragraph 1 , the Agency shall either approve the proposal defining the system operation regions or propose amendments. In the latter case, the Agency shall consult the ENTSO for Electricity before adopting the amendments. The adopted proposal shall be published on the Agency's website.	Support Council text. ENTSO-E recommends an adjustment, in line with the Parliament amendment of article 31(3), inserting a consultation with NRAs of MS involved. 2. Within three months of receipt of the proposal in paragraph 1, the Agency shall either approve the proposal defining the system operation regions or propose amendments. In the latter case, the Agency shall consult <i>the regulatory authorities of involved Member States</i> , and the ENTSO for Electricity before adopting the amendments. The adopted proposal shall be published on the Agency's website.
Article 33 <i>Geographical scope of regional operational centres</i>	AM 130 Article 33 – title Geographical scope of regional <i>coordination</i> centres	<i>Article 33</i> <i>Geographical scope of [] Regional Security Coordinators</i>	Support of Council text. Some relevant amendments as below
		0a. For the purpose of this Regulation, the geographical areas covered by each of the transmission system operators sharing the same regional security coordinators established pursuant to the System Operation Guideline adopted on the basis of Article 18 of Regulation 714/2009 shall be referred to as system operation regions.	ENTSO-E supports the Council formulation, since it recognizes the continuity in the efforts to implement RSCs pursuant to SOGL. RSCs and TSOs are ensuring consistent procedures within a region and between regions.
		1a. Where a Member State is part of multiple different synchronous areas, the transmission system operator may be coordinated by two regional security coordinators. For the bidding zone borders adjacent to system operation regions, the proposal in paragraph 1	ENTSO-E supports the Council text and proposes an additional adjustment in article 33(1)(a): MSs can take part in different CCRs, even without being in different synchronous areas, where a cooperation between RSCs should be established. Therefore, TSOs should have

		shall specify how the coordination between regional security coordinators for these borders is to take place.	the flexibility in that case to also coordinate with two different RSCs. Therefore, the following adjustments are proposed: 1a. Where a Member State is part of multiple different capacity calculation regions different synchronous areas , the transmission system operator may be coordinated by two regional security coordinators.
<i>Article 34</i> <i>Tasks of regional operational centres</i>	AM 132 Article 34 – title Tasks of regional coordination centres	<i>Article 34</i> <i>Tasks of [] Regional Security Coordinators</i>	
(n) preparation and carrying out of yearly crisis simulations in cooperation with competent authorities pursuant to Article 12(3) of [Regulation on risk preparedness as proposed by COM(2016) 862];		(n) preparation and carrying out of yearly crisis simulations in cooperation with competent authorities pursuant to Article 12(3) of [Regulation on risk preparedness as proposed by COM(2016) 862];	ENTSO-E recommends that consistency is ensured with the Council General Approach on the Risk Preparedness Regulation. Proposed adjustments to ensure consistency with Council General Approach for Risk Preparedness Regulation: -preparation and carrying out of yearly crisis simulations in cooperation with transmission system operators [competent authorities] , up to extent they are required, according [pursuant] to Article 12(3) of [Regulation on risk preparedness as proposed by COM(2016) 862];
(q) calculate the maximum entry capacity available for the participation of foreign capacity in capacity mechanisms pursuant to Article 21(6).		(q) calculate the value for the maximum entry capacity available for the participation of foreign capacity in capacity mechanisms [] for the purpose to issue an recommendation pursuant to Article 21(6).	Proposed adjustment, to ensure consistency with article 21(6) and Annex I: (q) support to the calculation of the value for the maximum entry capacity available for the participation of foreign capacity in capacity mechanisms for the purpose to issue an recommendation pursuant to Article 21(6)
<i>Article 35</i> <i>Cooperation within regional operational centres</i>	AM 137 Cooperation within and among regional coordination centres	<i>Article 35</i> <i>Cooperation within [] and between Regional Security Coordinators</i>	Support of Council text with proposed adjustments to art 35(c), in line with the Parliament proposal for a single procedure to set up and review coordinated actions.

(c) a procedure for the adoption of decisions and recommendations in accordance with Article 38;	(c) a procedure for the adoption <i>and revision</i> of decisions and recommendations in accordance with Article 38 <i>that ensures equitable treatment between members of the regional operational centre</i> ;	(c) a procedure for the adoption of [] coordinated actions and recommendations in accordance with Article 38;	Regulation should preferably state the requirement for a single procedure to include how the proposals from RSCs are adopted and reviewed by TSOs. In order to simplify regulatory requirements, details should be better left to the procedures themselves, which must be approved by the relevant regulatory authorities. c) a procedure for the adoption <i>and revision</i> of [] coordinated actions and recommendations in accordance with Article 38 <i>that ensures equitable treatment between members of the regional operational centre</i> ;
(d) a procedure for the revision of decisions and recommendations adopted by regional operational centres in accordance with Article 39.	<i>deleted</i>	(d) a procedure for the revision of [] coordinated actions and recommendations [] issued by Regional Security Coordinators in accordance with Article 39.	(d) a procedure for the revision of [] coordinated actions and recommendations [] issued by Regional Security Coordinators in accordance with Article 39.
<i>Article 38</i> <i>Adoption of decisions and recommendations</i>	AM 142 Article 38 – title Adoption <i>and revisions</i> of decisions and recommendations	<i>Article 38</i> <i>[] Coordinated actions and recommendations</i>	
	AM 147 Article 38 – paragraph 3 b (new) <i>3 b. The revision shall be triggered at the request of one or more of the transmission system operators of the system operation region. Following the revision of the decision or recommendation, regional operational centres shall confirm or modify the measure.</i>		ENTSO-E supports the EP text on article 38.3b new, which is also in line with Council text for article 39(2). The following adjustments are proposed to improve comprehensibility: 3.b. The procedure revision of previously set up coordinated actions or recommendations shall can be triggered at the request of one or more of the transmission system operators of the system operation region. Following the revision of the [] coordinated action or recommendation, [] Regional Security Coordinators may confirm or modify the measure.

	<p>AM 146 Article 38 – paragraph 3 a (new) <i>3 a. Where a transmission system operator decides to deviate from the decision or recommendation issued by the regional coordination centre, it shall submit a detailed explanation to the regional coordination centre and to other transmission system operators of the system operation region without delay.</i></p>	<p>2a. Where following the revision triggered in accordance with Article 39, a transmission system operator decides not to implement a coordinated action for the reasons set out in paragraph 2, it shall transparently report the detailed reasons to the Regional Security Coordinator and the transmission system operators of the system operation region without undue delay. In such cases, the Regional Security Coordinator shall assess the impact on the other transmission system operators of the system operation region and may propose a different set of coordinated actions subject to a procedure in paragraph 2.</p>	<p>ENTSO-E supports AM 148 from the EP regarding article 38, paragraph 3.a (new).</p>
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Electricity Regulation ANNEX I			
AM 186			
FUNCTIONS OF REGIONAL OPERATIONAL CENTRES	FUNCTIONS OF REGIONAL COORDINATION CENTRES	[] TASKS OF REGIONAL [] SECURITY COORDINATORS	
5. Coordination and optimization of regional restoration		5. (8 in GA) Support the coordination and optimization of regional restoration	<p>Council text is supported, as it provides consistency with SOGL provisions. Some adjustments are proposed to ensure consistency with Art 34, SOGL, and other parts of recast Regulation.</p> <p>In consistency with Recital 35, requirements to develop this service should be removed.</p> <p>It does not introduce added value but on the contrary, adds additional interlocation which could be counterproductive in the restoration.</p> <p>The RSC support in operational planning timeframes (as described in point 4 above) is adequate and in line with ER NC.</p>

5.1. Regional operational centres shall be equipped with the close to real time supervisory control and data acquisition systems with the observability defined by applying the threshold defined in accordance with point 4.1.	<i>deleted</i>	[]	
5.2. Each relevant regional operational centre shall provide assistance to the appointed frequency leaders and the resynchronisation leaders aiming at improving the efficiency and effectiveness of system restoration. Transmission system operators shall be entitled to request assistance from regional operational centres if their system is in a blackout or restoration state.	5.2. Each relevant regional coordination centre shall provide assistance to the appointed frequency leaders and the resynchronisation leaders aiming at improving the efficiency and effectiveness of system restoration. Transmission system operators shall be entitled to request assistance from regional coordination centres if their system is in a blackout or restoration state.	5.2 (8.2 IN GA) Each relevant regional [] security coordinator shall [] support the transmission system operators appointed as [] frequency leaders and the resynchronisation leaders pursuant to Articles 29 and 33 of Commission Regulation xxxx/xxxx establishing a network code on emergency and restoration [aiming at improving] to improve the efficiency and effectiveness of system restoration. The transmission system operators of the system operation region shall define the role of the regional security coordinator relating to the support to the coordination and optimisation of regional restoration.	ENTSO-E proposes to delete this provision.
		8.3 in GA (ex last sentence of 5.2) Transmission system operators [] may [] request assistance from regional [] security coordinators if their system is in a blackout or restoration state.	<i>deleted</i>
		8.4 in GA Regional security coordinators shall be equipped with the close to real time supervisory control and data acquisition systems with the observability defined by applying the threshold defined in accordance with point 4.1.	<i>deleted</i>
6. Post-operation and post-disturbances analysis and reporting		6. (9 in GA) Post-operation and post-disturbances analysis and reporting	

6.1. Regional operational centres shall investigate and prepare a report on any incident above the threshold defined in accordance with point 4.1. The regulatory authorities of the system operation region and the Agency may be involved in the investigation upon their request. The report shall contain recommendations aiming at preventing similar incidents in future.	6.1. Regional coordination centres shall investigate and prepare a report on any incident above the threshold defined in accordance with point 4.1. The regulatory authorities of the system operation region and the Agency may be involved in the investigation upon their request. The report shall contain recommendations aiming at preventing similar incidents in future.	6.1 (9.1 in GA) Regional [] security coordinators shall [] prepare a report on any incident above the threshold defined in accordance with point 4.1. The regulatory authorities of the system operation region and the Agency may be involved in the investigation upon their request. The report shall contain recommendations aiming at preventing similar incidents in future.	In order to clarify the service as a support to TSOs in post-operation analysis and reporting, the following adjustment is suggested: 9.1 (ex 6.1) Regional [] security coordinators shall <u>assist transmission system operators [] in</u> preparing a report on any incident above the threshold defined in accordance with point 4.1. The regulatory authorities of the system operation region and the Agency may be involved in the investigation upon their request. The report shall contain recommendations aiming at preventing similar incidents in future.
7. Regional sizing of reserve capacity		[]	Council text is supported.
7.1. Regional operational centres shall determine the reserve capacity requirements for the system operation region. The determination of reserve capacity requirements shall:	7.1. Regional coordination centres shall determine the reserve capacity requirements for the system operation region. The determination of reserve capacity requirements shall:		ENTSO-E supports the Council General Approach for no additional mandatory service to dimension reserve capacity at regional (RSC) level. This position is aligned with the SOGL and EBGL approach to integrate the pan-EU balancing market while respecting the obligations and responsibilities established at load-frequency control level.
8. Facilitation of the regional procurement of balancing capacity		[]	Council text is supported
8.1. Regional operational centres shall support the transmission system operators of the system operation region in determining the amount of balancing capacity that needs to be procured. The determination of the amount of balancing capacity shall:	8.1. Regional coordination centres shall support the transmission system operators of the system operation region in determining the amount of balancing capacity that needs to be procured. The determination of the amount of balancing capacity shall:		Council General Approach for no additional mandatory service of RSC to facilitate the procurement of balancing capacity at regional level is supported. This support is not purposeful for the implementation of the pan-EU balancing framework as established in the EBGL
9. Regional system adequacy forecasts and preparation of risk reducing actions		9. (5 in GA) Week-ahead to day-ahead regional system adequacy [] assessments and preparation of risk	Week-ahead to day-ahead regional system adequacy forecast assessments and

		reducing actions	preparation assessment of risk reducing actions. (Adjustment to make the description of the service consistent with Article 34)
10. Regional outage coordination		10. (6 in GA) Regional outage planning coordination	
10.1. Each regional operational centre shall perform outage coordination in order to monitor the availability status of the relevant assets and coordinate their availability plans to ensure the operational security of the transmission system, while maximizing the capacity of the interconnectors and/or the transmission systems affecting cross-zonal flows.	10.1. Each regional <i>coordination</i> centre shall perform outage coordination in order to monitor the availability status of the relevant assets and coordinate their availability plans to ensure the operational security of the transmission system, while maximizing the capacity of the interconnectors and/or the transmission systems affecting cross-zonal flows.	10.1 (6.1 in GA) Each regional [] security coordinator shall perform regional outage coordination in accordance with the procedures set out in Article 80 of Commission Regulation 2017/1485 establishing a guideline on electricity transmission system operation in order to monitor the availability status of the relevant assets and coordinate their availability plans to ensure the operational security of the transmission system, while maximizing the capacity of the interconnectors and/or the transmission systems affecting cross-zonal flows.	<p>The monitoring of the availability status of relevant assets and the coordination activity with their owner or outage planning agents is not a RSC task. Additionally, the criteria for TSOs, DSOs and RSCs to solve potential outages incompatibilities, described in the SOGL, art 95 and 96, should be maintained:</p> <ul style="list-style-type: none"> - For outage planning incompatibility of not TSO or DSO assets, the alternative availability plan shall limit the changes to the initial availability plan to those strictly necessary to ensure operational security, - For planning availability of TSO or DSO assets, the target shall be to minimize impact on the market. In case of outage planning incompatibility, the impact reported by affected outage planning agents shall be taken into account and notify the relevant NRAs if so the case. <p>In consistency, next adjustment is proposed: 6.1 (ex 10.1) Each regional [] security coordinator shall perform regional outage coordination in accordance with the procedures set out in Article 80 of Commission Regulation 2017/1485 establishing a guideline on electricity transmission system operation in order to monitor the availability status of the</p>

			relevant assets and coordinate their availability plans to ensure the operational security of the transmission system, while maximizing the capacity of the interconnectors and/or the transmission systems affecting cross-zonal flows.
11. Optimization of inter-transmission system operators compensation mechanisms		11. (12 in GA) Optimization of inter-transmission system operators compensation mechanisms	Removed in Art. 34 Optimization of inter-transmission system operators compensation mechanisms
11.1. Regional operational centres shall support the transmission system operators of the system operation region in administering the financial flows related to inter- transmission system operators settlements involving more than two transmission system operators, such as redispatching costs, congestion income, unintentional deviations or reserve procurement costs.	11.1. Regional <i>coordination</i> centres shall support the transmission system operators of the system operation region in administering the financial flows related to inter- transmission system operators settlements involving more than two transmission system operators, such as redispatching costs, congestion income, unintentional deviations or reserve procurement costs.	11.1 (12.1 in GA) The transmission system operators of the system operation region may jointly decide to receive support from the regional security coordinator [] in administering the financial flows related to inter-transmission system operators settlements involving more than two transmission system operators, such as redispatching costs, congestion income, unintentional deviations or reserve procurement costs.	<i>Deleted</i>
12. Training and certification		12. (7 in GA) Training and certification of staff working for regional security coordinators	Council text is supported.
13.1. If ENTSO for Electricity delegates this function, regional operational centres shall identify regional crisis scenarios in accordance with the criteria set out in Article 6(1) of [Risk Preparedness Regulation as proposed by COM(2016) 862]	13.1. If ENTSO for Electricity delegates this function, regional <i>coordination</i> centres shall identify regional crisis scenarios in accordance with the criteria set out in Article 6(1) of [Risk Preparedness Regulation as proposed by COM(2016) 862]	13.1 If the ENTSO for Electricity delegates this function, regional [] security coordinators shall identify regional crisis scenarios in accordance with the criteria set out in Article 6(1) of [Risk Preparedness Regulation as proposed by COM(2016) 862].	
		The identification of regional crisis scenarios shall be performed in accordance with the methodology set out in Article 5 of the [Risk Preparedness Regulation].	<i>Support to</i> the identification of regional crisis scenarios shall be performed in accordance with the methodology set out in Article 5 of the [Risk Preparedness Regulation].
13.2. Regional operational centres shall prepare and carry out yearly crisis	13.2. Regional <i>coordination</i> centres shall prepare and carry out yearly crisis	13.2 Regional [] security coordinators shall support the	Council text is supported.

simulation in cooperation with competent authorities according to Article 12(3) of [Risk Preparedness Regulation as proposed by COM(2016) 862].	simulation in cooperation with competent authorities according to Article 12(3) of [Risk Preparedness Regulation as proposed by COM(2016) 862].	competent authorities of each system operation region in the preparation and carrying out of [] annual crisis simulation [] in accordance with Article 12(3) of [Risk Preparedness Regulation as proposed by COM(2016) 862].	The following adjustments are needed, in order to make the text consistent with regional coordination governance. 13.2 Regional security coordinators shall support transmission system operators and the competent authorities of each system operation region in the preparation and carrying out of [] annual crisis simulation [] if so required in accordance with Article 12(3) of [Risk Preparedness Regulation as proposed by COM(2016) 862].
		14. (10 in GA) Calculation of the maximum entry capacity available for the participation of foreign capacity in capacity mechanisms.	The following adjustment to Council text is suggested to make the description of the service consistent with art 34 and 21. 14. Support to the calculation of the maximum entry capacity available for the participation of foreign capacity in capacity mechanisms.