



# EASE Feedback on IGDs for Grid Connection Network Codes

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**Brittney Becker**

Policy Officer



# Feedback on IGDs: CBA for Network Codes

- The CBA is a key element of GC NCs procedures. An effective CBA process is crucial for all involved stakeholders (TSO, DSO, generators). A consensus on its main principles (methodology, process organisation, data collecting and exchange) is required.
- However, **several key issues are still under discussion**, e.g.:
  - ✓ Potential disadvantage for stakeholders that may not have the competence to carry out or to check a CBA study (in frame of the derogation procedures)
  - ✓ Issues related to data opposability/accessibility: when and to what extent is the use of “typical” or “normative” data preferable over more detailed but confidential data?
- Further concerns:
  - ✓ A 1-month consultation on the quantitative CBA will be too short for involved stakeholders to adequately respond.
  - ✓ The workshops so far did not suffice to adequately solve all open questions.
  - ✓ **The CBA IGD does not provide enough elements to understand whether its procedure is really feasible and non-discriminatory for all types of stakeholders (not only TSOs).**



# Feedback on IGDs: CBA for Network Codes

- Therefore, EASE supports the creation of an ad-hoc expert group piloted by a neutral actor (ACER?) and involving main competences from the power sector (transmission, distribution grid operation and planning, generation facilities operation, supply-demand balance optimisation, security of supply management ...).
- Its primary objective should be to identify and address main “pending” questions on the CBA use under NC codes, and to provide consensual answers to them.



# Thank you for your attention.

**EASE – European Association for Storage of Energy**  
Avenue Adolphe Lacomblé 59/8 | BE – 1030 Brussels  
Tel: +32 2 743 29 82  
Twitter: @EASE\_ES  
[info@ease-storage.eu](mailto:info@ease-storage.eu)  
[www.ease-storage.eu](http://www.ease-storage.eu)

**Secretary General: Patrick Clerens**  
[p.clerens@ease-storage.eu](mailto:p.clerens@ease-storage.eu)



# EASE Members

