EURELECTRIC comments on NC Emergency & Restoration *(updated version from 22/01)*

ENTSO-E 4th Public workshop

Brussels, 12/02/2015

GENERAL

Many of EURELECTRIC's suggestions have not been taken into account without proper justification (see further details below)

Definition of SGU assigned for an active participation in this code :

- Reference to SGU is unclear : are existing plants in/out of the scope?
- Art. 2 : A Defence Service Provider and a Restoration Service Provider is an entity with a legal or contractual obligation to provide this service. What means "legal"? According to national law?
- Art. 8.7 : what if a Significant Grid User refuses to participate due to technical / financial reasons?

  Is it different if the European codes apply or if national legislation applies (see item above)?
- **Rules for derogations** should be added

Approval of NRA is needed for the complete System Defence Plan and System Restoration Plan

Not mentioned in Art. 8.6

SYSTEM DEFENCE PLAN

- Art.8.1: The request for Coordination in the production of the System Defence and Restoration Plans has been ignored. These plans place risks outside normal operation on plants, and consultation is not sufficient for a TSO to understand and address these risks. Coordination is necessary.
- **Art. 11: TSO coordination in Emergency State & CRM provisions**
  - Situations where generation capacity has been contracted between two countries under a capacity remuneration mechanisms (CRM) for adequacy purposes are not recognised.
  - This makes cross-border participation in capacity markets more difficult as capacity contracts with foreign generators would not be as reliable as in-land generation.
  - **The NC should at least stipulate that TSO actions in those specific conditions *"should have minimum impact on grid users and market activities, namely cross-border capacity"*** (along the line of the wording used in the supporting document).
- Art.15.1 : no reference is made to existing plants, they should fulfil the requirements in the national legislation

RESTORATION PLAN

Settings of LFSM-O, LFSM-U and FSM

- Art.27.2 : does this mean that the settings of the FSM can change case by case? Changing those parameters in existing power plants can be task for experts of the OEM (not present during a restoration period). It's not possible to change this during operation in existing plants.

MARKET INTERACTIONS

Market Activities Suspension and Restoration Triggers

- Art. 2: Welcome introduction of "Market Activities Restoration Triggers" but the definition should stipulate that those triggers should be met cumulatively to start restoration of market activities.
- Art. 32 § 2 and 3: Not convinced about the added-value of those paragraphs. Suggestion to delete them as they give the impression that market activities are the (only) cause of the Emergency State. Market activities should not be blamed for an internal incident in the grid.
- Art. 32.6: Welcome introduction of a waiting period for Market Activities Suspension Triggers but no such period should be respected for Market Activities Restoration Triggers. A dedicated procedure is described in Art. 34.1.
- Art. 32.7: Meaning of this paragraph to be clarified – The ability to assess triggers in real time by TSOs should not be the condition to define such triggers. Triggers should be defined independently and TSOs should ensure that they can assess them in real time.

MARKET INTERACTIONS (follow-up)

Procedure for market activities suspension

- Art. 33.1: It should be clarified that when one or several of the Market Activities Suspension Triggers are met and thus market are suspended (Art. 32.4), the Emergency State should automatically be declared and that the procedure explained in Art. 33 applies.

Procedure for market activities restoration

- Art. 34.2. Market Parties can restore activities only when a certain number of parameters are defined but many of those parameters should be activated by TSOs (e.g. XB capacity calculation). The TSO processes should thus be activated before the markets can start again → to be included in Art. 34.1.

  Amendment proposal: *"Each TSO, in coordination with neighbouring TSOs, shall launch the restoration of TSO processes at the appropriate moment in the restoration procedure".*

MARKET INTERACTIONS (follow-up)

Settlement principles (Art. 36)

- We regret that ENTSO-E did not take into account our suggestion to have TSOs acting as settlement coordinator without proper justification despite it would be the most simple solution.
- The NC should clearly stipulate that BRPs should not pay some imbalances they are not responsible for. Amendment proposal: *"The settlement rules and principles shall ensure that BRPs are not unduly asked to recover imbalances charges, in circumstances where it occurs that their imbalance was out of their control, due to the TSO necessary actions".*
- Furthermore, basics for the supply of energy by each plant during black-out and restoration phase has to be defined in the NC. Such contracts should be defined upfront and should include cost elements such as:
  - Cost per MWh injected in the grid (indexed in fuel cost);
  - Period of time the plant is working on houseload;
  - Period of time a black start plant is not active and waiting to go on houseload;
  - Number of failed synchronization actions due to grid instabilities, etc…

COMMUNICATION AND COMPLIANCE TESTING

Conflicts with nuclear regulations : Nuclear safety should be a priority

Art. 39.2 : “at least 24 hours” can create a conflict with nuclear regulations in some countries

The period of time should be harmonised on European scale: minimum and maximum values to be added

Compliance tests

Art. 41 : test of a black start unit : “according to the contract for blackstart service between TSO and the power plant operator, but at least every three years”.

Art. 40.2 : no reference is made to existing plants, they should fulfil the requirements in the national legislation

Communication

Art.38 : installation and operation of such a communication system should be the duty of the TSO

WORDING ISSUES

A dedicated paper will be submitted to ENTSO-E