

Minutes of Meeting
ENTSO-E Drafting Team on DCC
DCC User Group

Date: 5 July 2012
Time: 14h00 – 17h00
Place: ENTSO-E, Brussels

Participants

Association	Representative	Organization
ANEC/BEUC	-	-
CECED	Luigi Meli	CECED
	Candice Richaud	CECED
CEDEC	Herman Poelman	Alliander
CENELEC	-	-
EDSO-SG	Florian Chapalain	EDSO-SG
	Riccardo Lama	ENEL
EHPA	-	-
Eurelectric DSO	Jacques Merley	ErDF
	Pavla Mandatova	Eurelectric DSO
Eurelectric WG Thermal	Karl Diethelm	Axpo
ESMIG / SG CG (M490)	Willem Strabbing	ESMIG
IFIEC	Bernd-Christian Pago	Infracor GmbH
Geode	Johan Lundqvist	Svensk Energi
	Mike Kay	ENWL
Orgalime	Bertrand Deprez	Schneider Electric
	Anne-Claire Rasselet	Orgalime
SEDC	Ali Haider	SEDC
ENTSO-E	Anders Danell	Svenska Kraftnett
	Edwin Haesen	ENTSO-E
	Bastian Homburg	Amprion
	Mark Norton	Eirgrid
	Juergen Schmitt	Swissgrid

1. Agenda

14:00-15:00hrs Discussion on draft code under public consultation:

- ENTSO-E clarification on main drivers (stakeholder feedback, internal ENTSO-E approvals, ACER feedback, alignment with NC RfG)
- User Group feedback / questions

15:00-15:30hrs Coffee break

15:30-16:00hrs Discussion on draft code under public consultation (cont'd)

16:00-17:00hrs Consultation period:

- Timetable
- Public workshop 9 August
- Continued interaction between Drafting Team and User Group

In addition to the draft agenda, ENTSO-E states it wishes to focus on three questions for the User Group participants:

- What are your three key issues with the present draft code?
- What additional material or alternative angles do you expect from the supporting documentation?
- What do you expect as an optimal means for continuous interaction in the period of mid-September until December?

Agenda is approved.

2. Key issues with the present draft code

ENTSO-E asks all present DCC User Group members to list and clarify three key issues with the draft DCC presently under consultation, as a means for further discussion in this meeting and possible further development of the code and its supporting documents. This list does not represent the only issues that can possibly be addressed in the formal consultation. It is also noted that (except for the DSO Technical Expert Group), the user group participants have seen the draft code only since its publication for consultation on 27 June.

All issues mentioned and that were discussed are listed below as well as a short outcome of the related discussion:

- CECED asks for clarification on the basic relation between end user and network operator. Are DSR services to be mandatory, voluntary, or market based? CECED questions the decision process as described in Art 15 in which an NRA gives a final approval on the identification of significant devices. The link with other legislative processes at European level for appliances is raised.
- Eurelectric WG Thermal asks for clarification on priority dispatch for grid supply to auxiliaries of nuclear power plants (see slide)
 - Given the specific nature of the question and the link with other codes, ENTSO-E will provide clarification after the meeting.

- IFIEC addresses Art 10(1)1.b on the capability of compensation of the transmission connected distribution network referring to a 25% loading situation. IFIEC notes there are at present rarely compensation devices in industrial grids and assume there is no problem if the grid would export reactive power.
 - ENTSO-E notes that the 25% requirement refers to a compliance simulation, not a continuous operation. It is a static measurement. The requirement does not require a specific control system. The requirement focuses on a capability, without prejudice on how reactive power flows between transmission and distribution networks are managed/agreed/required.
- ESMIG/SGCG would prefer a link (in the code or supporting documents?) which refers to the Smart Grid Coordination Group and which covers communication links for DSR.
- Orgalime asks for clarification on the risk that customers could be disconnected as a result of the DCC grid connection requirements. In the context of Art 15 and 17, Orgalime asks that mandatory requirements should be limited to well defined and critical cases. Orgalime's main concern at this stage is a perceived lack of clarification on several issues, e.g. market models.
- SEDC is generally positive towards the deployment of DSR in the development of the DCC. As discussed in the previous User Group meeting (19 April), SEDC asks for an equal treatment of DSR resources. SEDC also points out the importance of privacy rights and property protection in case of mandatory requirements (Art. 15 and 17). In the Call for Stakeholder Input a comment was raised that the DSR conclusions may be premature based on results of the Irish and GB system only; it is noted that in the published FAQs also CBAs for Continental Europe and the Nordic system have been elaborated.

(Note, the same question was posed to the DSO Technical Expert Group in a bilateral meeting earlier that day. See public notes of this meeting for further details.)

Discussion on questions related to DSR:

On the process for identifying significant devices for DSR / DSR-SFC in Art 15(3)b-c:

- Geode asks for clarification if a similar identified temperature controlled device would be present in e.g. a hospital which is considered a 'sensitive' load and is connected at MV (meaning it is not exempted from compliance tests). The DT notes that this specific case is likely not justifiable. In any case a Demand Facility owner still has the option to provide voluntary DSR services.
- Orgalime asks if the process for identification can link to an existing process, e.g. in another regulation? Orgalime states that the process with a future identification creates uncertainty as to which are significant users; more clarity would be helpful.

On the link with underlying market models:

- ENTSO-E notes that this code only covers connection capabilities, a.o. to enable possible future models (see FAQ 12 – "Why does the network code not define certain requirements as paid-for ancillary services?").
- Orgalime asks why the code does not link e.g. to market models being developed in the work of M490. ENTSO-E notes due to time constraints some developments occur in parallel; it is not feasible to refer to a result which is not present yet. In addition as this network code will eventually go through comitology, it is not possible to refer in the code to an external document to make it legally binding. (Note: similar discussions have taken place in the development of other codes, confirming this position). All agree on the principle that the DCC cannot refer directly to other documents.

CECED notes that it still has a fundamental concern on the CBA cases as addressed in the Call for Stakeholder Input as how a break-even point based on the expected occurrence of a system event makes the CBA positive.

On compliance monitoring/testing of DSR-SFC capabilities:

- ENTSO-E notes that for DSR-SFC there is no compliance test in the field. There is also no certification with each unit in the present draft. CECED argues that compliance needs to be enforced to pursue 100%

compliance and avoid 'free-riders'. ENTSO-E refers to how EMC requirements are tested in practice. Market surveillance authorities do inspections/tests at factory level. Compliance in the field is never tested.

- The DSOs refer to compliance testing in the NC RfG, where also a responsibility is laid with the DSO. In the present DCC draft the responsibility is considered to be less clear with respect to DSR.

3. What additional material or alternative angles do you expect from the supporting documentation?

Orgalime requests to have more insight in market models with regard to the prescribed DSR capabilities. ENTSO-E refers to possible discussions in the public workshops, explanations on the rationale in FAQs and follow-up User Group meetings.

Geode proposes to add a FAQ covering domestic customers: "What are my options as a domestic user to participate in DSR services referred to in the DCC?"

Orgalime proposes to add a FAQ covering privacy rights and which appliances are considered appropriate for DSR?

4. What do you expect as an optimal means for continuous interaction in the period of mid-September until December?

CECED and Orgalime ask for more involvement of consumer organizations in the User Group. ENTSO-E notes that ANEC/BEUC are invited to DCC User Group meetings.

5. Next steps

Suitable dates will be looked for:

- The week of 20 September: to assess the main issues raised in the web consultation on DCC
- The week of 5 November: to get feedback from the User Group on the evolutions in the DCC.