

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

Date: 18 September 2012

Time: 13h30 – 17h00

Place: ENTSO-E, Brussels

Participants

Association	Representative	Organization
ANEC/BEUC	-	-
CECED	-	-
CEDEC	Herman Poelman	Alliander
CENELEC	-	-
EDSO-SG	Florian Chapalain	EDSO-SG
	Riccardo Lama	ENEL
EHPA	-	-
Eurelectric DSO	Jacques Merley	ErDF
	Siegfried Wanzek	EON AG
Eurelectric WG Thermal	Ifigenia Stefanidou	AXPO
ESMIG / SG CG (M490)	-	-
IFIEC	Jean-Pierre Becret	Solvay
Geode	-	-
Orgalime	Sebastien Mathiou	Schneider Electric
SEDC	Ali Haider	SEDC
	Jessica Stromback	SEDC
ENTSO-E	Edwin Haesen	ENTSO-E
	Bastian Homburg	Amprion
	Mikko Koskinen	Fingrid
	Mark Norton	Eirgrid
	Dwayne Shann	National Grid
NRA's	Jakub Fijalkowski	E-control
EC	-	-

ENTSO-E thanks all participants for attending this meeting and is pleased that from the regulator's viewpoint Jakub Fijalkowski will attend this meeting as an observer. The EC was invited as well but is excused.

ENTSO-E notes that in past meetings the question was raised whether consumer organizations wish to follow up this process and give input. ANEC/BEUC is in the User Group contact list, and reconfirmed that they wish to remain informed of the development; however no formal position with regards to this network code will be taken.

1. Agenda

A draft agenda has been sent to all participants, with a main objective to discuss among all User Group members, the key issues submitted in the recently closed web-based consultation on the draft DCC. The agenda is agreed by all.

- 13:30 Welcome
 - 13:30 Agenda
 - 13:35 Overall response in web-based consultation
- 13:45 Key comments submitted
 - 13:45 General code comments (e.g. definitions, procedures)
 - 14:15 Demand Side Response Autonomous
 - 14:45 Demand Side Response Remote Controlled
 - Input from all participants & group discussion
- 15:15 *Coffee break*
 - 15:40 Transmission to 3rd Party Demand Interface
 - 16:10 Any other topics
 - Input from all participants & group discussion
- 16:40 Next steps - Follow-up interaction
- 16:50 Conclusions
- 17:00 End of Meeting

2. Overview of comments received in the web based consultation

A short overview is presented of the comments received in the web based consultation that closed on 12 September: ca. 1500 comments from 38 organization responded.

Some key initial observations:

- Some comments were reproduced by several respondents (overlap per country or sector), resulting in a lower number of unique comments.
- Many comments referred to the five domains that were also addressed in the Call for Stakeholder Input.
- Other articles on which more respondents focused were those dealing with the scope, definitions and demand disconnection.

Some re-occurring comments address:

- Clarity
- Level of detail
- Justification
- Cooperation at European level (e.g. for DSR requirements)

Some actions the DT notes regarding DSR and for which feedback from the DCC Usergroup is asked:

- Examine more specific reference to Electric Vehicles;
- Examine justification and requirements for more specific inclusion in the code.

3. Key comments submitted

This topic is kicked off by those participants who wish to present an overview of their key points.

a. IFIEC

(see cover note and list of comments provided in the consultation for full list of comments)

- General comments, e.g.
 - Specification at national level should be performed from an overall perspective.
 - DSR products/services should be developed based on consumer discussions (e.g. how to deal with maintenance, firmness of the reserve, ...?).
 - A note is made to take the 'size effect' into account, e.g. if a site consists of thousands induction machines that in aggregate need to comply with a requirement at the connection point. Therefore, a specification imposing the replacement of existing equipments may result in very high costs. ENTSO-E notes the provisions that apply for existing users, and that the code focuses on new users (including modernization/replacement).
 - The scope and where-as section should be restricted to cross-border impacts.
- Detailed comments, e.g.
 - Why is DSR-SFC limited to temperature-controlled devices, and not opened up to other power-electronic coupled installations?
 - The definition of Main Plant, especially for a distribution network, should focus on the possible clients.
 - A request is made to reformulate Article 3(6)h on islanding of critical loads so that not only the load is allowed to island, but rather a part of the grid (i.e. together with generation). See also the related clause in the final NC RfG.
 - Frequency and voltage ranges should be compatible with existing product standards, taking also into account the "Ex" ones. If not, a tele-control signal should be given to instruct a safe disconnection. ENTSO-E clarifies that the frequency requirement is a design requirement for the design of the facility; it does not ask for continued infeed, disconnection is allowed.
 - Clarification is asked on why OLTC blocking is asked in some cases, while the same effect can be achieved by load shedding. ENTSO-E agrees that it has the same system impact, but then again, if sufficient load is shed to cope with a severe system event, LVDD and OLTC blocking would not be activated.
 - Wider ranges of frequency or voltage should be based on agreement between the site owner and Relevant Network Operator (in coordination with the TSO). Eurelectric DSO asks why a wider frequency range would ever be asked for by a TSO in a part of the system? ENTSO-E gives the example of sparse grids where in planned maintenance a higher risk on islanding is assessed which justifies wider ranges.
 - In the short circuit requirement a request is made to include minimum short circuit currents during 1-phase, 2-phase and 3-phase faults (e.g. for protection). The mentioned one week advance notification on a short circuit level change is considered too short. ENTSO-E agrees, the wording focused on an unplanned system event, not on planned events; wording will be revised to distinguish between both cases.
 - On the topic of automatic disconnection based on frequency, it is noted this does not exist at present in e.g. German law. ENTSO-E notes that EU law will supersede, however, the code does not apply to existing users if there is no justified case to change present agreements.
 - IFIEC suggests to not make one DSR service obligatory when offering another service
 - Art. 16/1/l and j should only be mandatory for installations which want to provide the service.
 - Retro-active application in a two year transition period is considered too short. ENTSO-E notes this is in line with ACER's framework guidelines.

Some User Group members ask how the frequency requirement (even acknowledging it is a design requirement) would apply to existing consumers; who is liable if there is a system event and an installation is damaged?

ENTSO-E notes that grid codes and standards evolve continuously and in some areas, national grid codes may already be more stringent than standards; still users have always coped with it.

Orgalime states that more load shifting (e.g. in DSR services) will increase overload/overvoltage occurrences which override present product standards. ENTSO-E asks whether this is a valid argument to state that DSR should not happen.

b. Joint DSO presentation (Eurelectric DSO / CEDEC / Geode / EDSO4SG)
(see slides)

It is noted that the DSO viewpoints have been discussed more in depth with ENTSO-E in a bilateral work session earlier that day.

The comments of the DSO Technical Expert Group focus on

- Reactive Power requirements, especially the capability for compensation of reactive power imports at low load (aimed at 25% of maximum import capacity).
- DSR compliance enforcement. ENTSO-E clarifies that for connections below 1000V no DSO responsibility is required in the draft DCC for DSR compliance enforcement.
- Clarification is asked on what to test and by which standards. The draft code mentions basic functional capabilities such as a time delay for response and information exchange. Standards are expected to build on this in further detail.

c. SEDC
(see slides)

SEDC welcomes the opportunities the DCC can give for DSR across Europe.

A key proposal by SEDC for DSR requirements is to specify that the contact between customer and Relevant Network Operator can be done via an aggregator (e.g. in information exchange). A similar proposal is made for compliance testing by an aggregator to lower resource burden on the Relevant Network Operator. ENTSO-E notes that the present requirement does not exclude the possible involvement of a 3rd party. The possibility of indication an aggregator interaction more explicitly in the code (for the avoidance of doubt) will be considered.

More detailed comments, e.g.

- It is welcomed that DSR is also acknowledged in the draft NC on Operational Security.
- The notion in the code of 'shall be equipped to ...' is discussed. ENTSO-E clarifies that the focus lies on the capability to send information, not what specific information has to be sent.
- SEDC proposes the aggregator is the responsible party for compliance of the portfolio, not the individual consumer. The aggregator would make sure that 100% is delivered by its own control system.
- Written communication to the Relevant Network Operator of its installation modification can be done through an aggregator as well. ENTSO-E states that the contractual obligation is on the demand facility or distribution asset owner, but acknowledges this may be done through an intermediate.
- In DSR Active Power Control the aggregator is not explicitly mentioned. This is left open in the code, and as such does not exclude any possible market mechanism.

d. Eurelectric WG Thermal / VGB

Eurelectric WG Thermal / VGB asks to make clear in the scope of the code, that the DCC does not include requirements for generation.

The application of definitions is questioned. What if definitions differ across codes? The draft NC on Operational Security states in its introduction that definitions of all codes apply for that code. All User Group participants agree that it is best to not include statements in a code that definitions of other codes apply as well.

ENTSO-E acknowledges that consistency across codes is a key for a successful implementation. As codes are being developed in parallel, this is a continuous exercise, also with regards to definitions.

Eurelectric WG Thermal proposes to remove priority customers from the scope of this code. ENTSO-E notes that auxiliaries of power generating facilities are already out of scope of the DCC.

e. Orgalime

Some proposals made by Orgalime are:

- Add an 'opt-out' solution for customers in the DSR SFC requirement.
- Recognize the customer payment and societal benefit. ENTSO-E restates that this cannot be part of the code itself (see also discussions in earlier discussions / workshops), but acknowledges that the greater scheme needs to be considered.
- Clarify on the role of storage in this code, similar as pumped storage. ENTSO-E will consider the application of this code to storage (e.g. looking ahead at possible future penetrations of electric vehicles), but proposes a technology neutral viewpoint.
- Make it clear what DSR services are going to be used for. Define the cases.
- Clarification on the role of standardization bodies.

The contribution of all participants is strongly appreciated.

A proposal for a following meeting with the User Group to discuss the initial assessment of consultation feedback and improvements in the code, will be sent around shortly.

End of meeting.