



ETSO Response to Public Consultation of the ERGEG Guidelines of Good Practice for Operational Security

13 June 2008

ETSO welcomes the chance to comment on the Guidelines for Good Practice (GGP) prepared by ERGEG. Our comments are mostly of a general nature given that there are no specific questions asked as part of the consultation.

While we note that the paper has been prepared as part of the ERGEG 2008 Work Programme, we are a little surprised at the timing of the document and unsure as to the intention in respect of next steps. The document comes at a time when the 3rd package proposed by the EC is approaching its final stages in the EU legislative process. One of the key issues in the package is the production of codes in some 11 areas, some of which include technical codes which relate to operational security. ETSO has been in discussion with both ERGEG and the EC for some time on how such codes might be developed, and it is our view that these codes would be best developed in the model foreseen in the third package. This is where the new ENTSO-E body is asked to develop such codes in an open and transparent manner with all affected stakeholders with the new arrangements emerging from the 3rd Package approving such codes once they have progressed through this process. We are therefore rather confused by the publication of these GGP at this time. Is it proposed that these GGP goes to Comitology and if so what actions should Member States take if it is approved, particularly when one thinks of existing legislation such as the Directive on Security of Supply? Are these GGP intended to be a 'strategic guideline' as proposed by ERGEG/CEER in its reactions to the 3rd Package? If it is, does it not need to cover technical codes that cover all timescales from long-term planning to medium-term planning right up to operational timescales which is the sole area the GGP seem to focus on? In short we are left rather unclear as to what problem these GGP are trying to address.

The GGP set out to cover four areas:

- Roles and responsibilities of different stakeholders and market players
- Organisational framework for synchronous power system operation
- Technical framework for operational security
- Training and certification of TSO staff

It also provides a diagrammatic depiction of how technical rules could work at a regional level but interestingly not at a EU level which one might have expected to be the focus of such a document. ETSO would broadly agree with this depiction so far as it goes but feel the real need is to focus at the EU level, in other words how the regional areas interact, as it is technical rules in this regard that are missing at present. The focus of the GGP is very much on the role of the TSOs in the last three bullet points above, but without first establishing role clarity on the responsibilities of parties connected to the TSO networks (namely generators, distributors and large customer loads), it will be difficult for TSOs to carry out their roles. This role clarity must be the subject of widespread consultation after which we would expect regulators to advise on whether TSOs as drafters of these codes

have reached a conclusion which takes into account, in an equitable manner, the needs of all network connectees. Simply requiring these connectees to comply with TSO instructions (e.g. section 4.4) will be insufficient. TSOs must be sure connectees have the capability to respond to such instructions before permitting their connection to the network. Otherwise the security of all network users will be jeopardised. It is also rather curious that a document drafted for the 'meta' level should get into such detail as the training of TSO staff. Such issues would be typically covered in internal working processes within TSOs such that they can respond and evolve to changing network needs rather than drafted in codes.

Generally we feel the GGP fall between two stools: one is that it is trying to react to actions that relate to system incidents over recent years, the other is trying to provide guidance at an EU level on how technical rules could be developed. What does ETSO feel should be the intent of such a document? Such GGP should focus on the issues at an EU level. We agree that Regional or national codes (UCTE handbook, GB Grid Code etc) should be reviewed with a view verifying their fitness for purpose and to determine what additional measures are needed at a pan-EU level to improve the interaction between TSOs on all aspects of system security. We would see this as one of the key responsibilities for the new ENTSO-E body working in close co-operation with the new ACER body as envisaged in the 3rd Package. In the meantime we would suggest that ETSO and ERGEG continue their discussions on system security to prepare the way for the development of EU level codes on this vitally important topic.