Summary of changes post-consultation

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DCC information session
12 December 2012, Brussels

entsoe
Reliable Sustainable Connected

Agenda

1. Drivers for change to the Code from consultation document
   a) Summary of Consultation Comments
   b) DSO TEG
   c) USER Group
   d) ACER driven interaction changes
   e) EC legislative interaction

2. Summary of Final Code modifications

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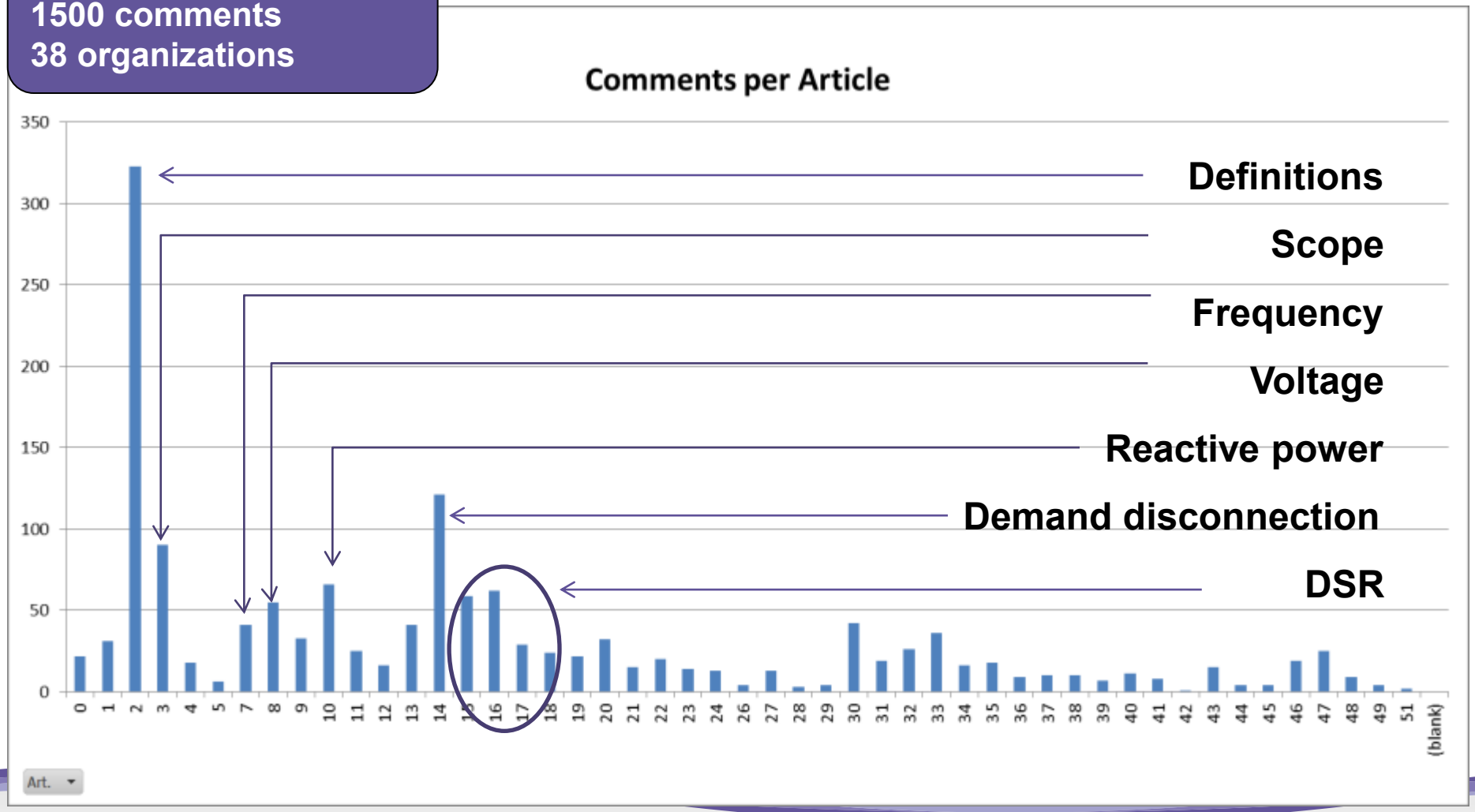
Summary of Consultation Comments

27 Jun. – 13 Sep. 2012
1500 comments
38 organizations



Key observations

- Number of unique comments evidently < 1500

  People working together: Per country/Per sector (DSOs)

- Themes:

General areas: Scope & Definitions	Notably the 5 call for stakeholder input topics	Demand disconnection
• Everyone defines a term differently • Scope needs more work to bring clarity	• Voltage • Frequency • DSR APC/RPC/TCM • DSR SFC • Reactive support	• Clarity • Co-operation • Process • Operational aspects not capabilities

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DCC – DSO TEG view

Past 1.5 years

- Over a dozen meetings took place with a dedicated DSO Technical Expert Group from early scoping to numerous revisions throughout the draft code
- Many changes introduced to resolve DSO concerns

Main comments stated in formal consultation:

- **Reactive power exchange**
  - Site specific requirements to cope with local conditions. TSO and DSO investments at equal footing.
- **DSR**
  - Requirements are not connection requirements
- **Various additional remarks**
  - All comments received have been responded to by DT and changes made in many places to issues raised

DSO TEG Group meeting on 13 Nov. 2012

- **Reactive power exchange**
  - Discussed DT revision to DSO TEG wording
  - DSO decision to move to dynamic reactive power exchange
  - Revised wording added to address these issues (e.g. on joint analysis)
- **DSR**
  - Compliance enforcement will be a burden on DSOs
  - Protection replacement needed for embedded generation and DSR
  - Revised wording added to installation document and in FAQs to address these issues

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DCC – User Group view

Past year

- Five meetings taken place with User Group during and after both formal consultation phases.
- Main forum to discuss latest evolutions of the code.

Main comments stated in formal consultation

- **Impact of DSR requirements:** Comments vary from modification to complete removal.
- **Mixed use sites:** Inclusion of clear applicability of requirements for sites where generation and demand co-exist.
- **Industry requirements:** should recognise technical and commercial implications.

Comments last formal meeting on 13th Nov. 2012

- **Limited issues:** other than those expressed by DSO TEG.
- **Remaining concerns:** Comments raised in user group and subsequent meeting mainly on need for more specific role of aggregators in code and feared bureaucracy of Installation document. General differing or opposing visions on DSR SFC.

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DCC – ACER interaction driven changes

Driven by interaction with **Network Code on Requirement for Generators**

- National scrutiny on national implementation (Art 9(3)) and cost recovery (Art 10)

  Similar areas as expressed in ACER Opinion on NC RfG – 13/10/2012

- Baseline with present practices

  Included in supporting documents: References to present practices and justifications by means of specific case studies

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DCC – EC legislative interaction

Network Codes

- Network Code should not impede smart grid vision to be delivered in longer term
- Appliance requirements were not “expected”
- The EC Impact Assessment would cover more aspects than ENTSO-E’s CBA (e.g. privacy, customer comfort)

Standardization & Smart Grids (Mandate 490)

- Smart Grid envisaged to be based on market model and remote control via aggregation.
- Early meeting between ENTSO-E and CENELEC/M490 agreed on the relation of high level functional NC requirements and further technology specific standards
- Two year extension of the mandate – so far no detailed Smart Grid standards have been delivered
- Final DCC and ENTSO-E / CENELEC MoU should enforce interaction
- At this stage, a final DCC could be a driving force for further standardization

DCC – EC legislative interaction

Eco Design Directive

- Eco Design is an appropriate ‘vehicle’ for requirements
- Mandating is possible but must be robustly justified
- Strong focus on free movement of goods without national decision

Energy Efficiency Directive

- Same principles as in DCC are stressed: flexibility with national conditions and socio-economic optimization
- Enters into force late 2012

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2. **Summary of Final Code modifications**

Summary of Draft code modifications

- Changes and underlying argumentations for Frequency, Voltage, Reactive Power and Demand Side Response requirements come later in the agenda.

- In many requirements the explicit reference to the use of ‘Transmission Connected’ and ‘Network Connection’ has been added.

- Main changes in order of appearance in code:
  - Definitions
  - Scope restructured
  - Short Circuit Requirements
  - Simulation models
  - Installation document
  - FAQs changes
    - Distribution Network protection issues
    - Alignment with other changes in Code

Summary of Draft Code modifications - Definitions

Structure of definitions has been changed to:

1. Definitions in Requirement for Generator (RfG) and Capacity Allocation and Congestion Management (CACM) code definitions – referred to in code
2. Definitions in Article 2 of Directive 2009/72/EC and in Article 2 of Regulation (EC) N°714/2009 – referred to in code
3. Definitions in 1 & 2 which are changed for the purpose of DCC are detailed
4. New definitions specific to this code specified

Rational:

- *To avoid network code upon entry into legislation creating an inconsistency with legislation reference rather than repetition.*
- *Some commonly used definitions need to be specific to a code, for example "Connection Point" can not be used from RfG as this refers to generators not Demand Facilities/Distribution Networks.*
- *Alignment of definitions across codes to the extent possible remains key.*

Summary of Draft Code modifications - Scope

Structure of scope has been changed to:

Article 3 Scope

Article 4 Significant Demand Facility and Distribution Network Connections

Article 5 Application to existing Demand Facilities and Existing Distribution Network Connections

Article 6 Reassessment of significance of Existing Demand Facilities and Existing Distribution Network connections

Article 7 Application to New Demand Facilities and New Distribution Network Connections

Article 8 Significance of New Demand Facilities and New Distribution Network Connections

Rational:

- *Re-ordering the sections in the code to provide a progressive series of specific Articles on each possible type of demand user*
- *Simplified in response to comments received*
- *Alignment with NC RfG format of description of services provided by each 'type' of demand users*
- *Mainly for Transmission Connected Demand Facilities and Transmission Connected Distribution Networks*

Summary of Draft Code modifications – Short Circuit

- Requirements have been changed to divide into planned and unplanned events.
- Relevant TSO will provide to Demand Facility Owner or Distribution Network Operator estimated max. and min. short circuit levels.

Rational:

- *Notification post changes in short circuit capability for planned events is not acceptable for a safety issue. A priori notification for unplanned events is evidently not feasible.*
- *Estimates of max. and min. Values of short circuit level may be required in design process of a Demand Facility or Distribution Network.*

Summary of Draft Code modifications – Simulation Models

Requirement has been changed to allow provision of equivalent information instead of simulation models.

Rational:

- *Development of new technologies may result in the need to provide models which do not exist at present.*
- *Specialist skills to develop models may not be available to users to provide information in model format.*
- *See FAQ 30 and outcome of extensive stakeholder meetings for more background info*

Summary of Draft Code modifications – Installation Document

- Process of supply of Installation Documents changed to submission at time of delivery of service in the market.
- Process of supply of installation documents explicitly clarified to make submission possible through an Aggregator.

Rational:

- *To avoid unnecessary submission of information*
- *The format of DSR capabilities collected by an Aggregator is outside of the code and can be agreed between the parties*

DCC Overview

ENTSO-E will publish a package of DCC documents early 2013:

- Final Network Code on Demand Connection (to ACER by 4 Jan. 2013)
- Supporting documents:
  - Evaluation of Comments
  - Frequently Asked Questions (including baseline of existing requirements and CBAs on key requirements of the DCC)
  - Justification Outlines
  - Short explanatory note on “How can the DCC facilitate Demand Side Response measures across Europe?”

Additional background information on the development of the DCC can be accessed at the ENTSO-E website

- Minutes of meetings with User Group, individual associations, DSO TEG
- “Call for Stakeholder Input” and received feedback
- Feedback in web-based consultation on draft DCC (27 Jun. – 13 Sep. 2012)

➢ Summary of changes post-consultation

Thank you all for your attention.

Questions?