

Minutes 3rd ENTSO-E Stakeholders Workshop on Operational Planning and Scheduling Network Code (OPS NC)

21 November 2012
10:30 h – 17:00 h
Avenue de Cortenbergh 100 - 1000 Brussels

The workshop attracted about 30 attendees. List of participants is attached to the minutes.

Programme

10:00 – 10:30	Registration/Welcome coffee	
10:30 – 10:45	Welcome	Mark Copley ENTSO-E Consultation Manager
10:45 – 11:45	Integration of Stakeholders Comments After the 2 nd Workshop and Next Steps	Yves Harmand <i>ENTSO-E Convenor of OP&S NC Drafting Team</i>
11:45 – 12:30	Stakeholders' view, Discussions	Workshop participants*
12:30 – 13:30	Lunch	
13:30 - 15:00	Stakeholders' view, Discussions	Workshop participants
15:00 – 15:30	Coffee break	
15:30 – 16:45	Stakeholders' view, Discussions	Workshop participants
16:45 – 17:00	Conclusions	Yves Harmand <i>ENTSO-E Convenor of OP&S NC Drafting Team</i>
17:00	End of Workshop	

Presentation is accessible at the ENTSO-E website <https://www.entsoe.eu/resources/network-codes/operational-planning-scheduling/>.

Welcome

Mark Copley, ENTSO-E Consultation Manager, welcomed the participants and shortly introduced two topics:

- 1) ENTSO-E consultation tool will be improved in near future. Public comments are going to be collected only via this tool. Mark kindly asks to use excel template so we can save a large amount of time when merging together.

- 2) Glossary consistency. ENTSO-E is preparing a glossary tool, which will contain all terms and definitions and will be helpful in reading all NCs.

Integration of Results after the 2nd Workshop

Yves Harmand welcomed the participants and introduced the changes made in the draft OPS code after the 1st and 2nd public stakeholders' Workshops on OPS code, Presentation is accessible on the ENTSO-E website <https://www.entsoe.eu/resources/network-codes/operational-planning-scheduling/>.

Stakeholders' view, Discussions

Netherlands, RWE/Essent production

Q: What threshold defines the relevant grid user (power plant) having influence on interconnection line. Why all significant grid users are not relevant users?

A: Influence of a generation outage is even decreasing significantly from a security point of view.

Belgium, Electrabel

Comment: Introducing of Significant and Relevant grid user terminology makes situation complicated. We should just say significant if the user is significant. It should be as simple as possible.

UK, SSE Generation

Q: Could you give any examples of the relevant grid users. It is difficult to identify stakeholders if the relevance of grid users is not clear.

A: Relevant grid users are the subset of significant grid users according to OS NC, which equipment have influence on the cross borders power flows

EDF, France

Comment: do not share the opinion that not all significant grid users should be relevant and take part in the outage planning process. He believes that the status of relevant grid user will not change often, it will be defined and informed in advance who is only significant and who is also relevant grid user.

Belgium, Electrabel

Q: All generators have to submit data to the platforms according to existing and coming new regulations. Could ENTSO-E use the same database? This can mean that suddenly all non-relevant generators can become relevant. TSOs should agree among themselves what is relevant for cross borders.

A: Exchange of information is covered by OS NC. The OPS covers only the outage planning coordination process. Introduction of definition of relevant grid user will make things more simple and flexible.

Germany, Verband Kommunaler Unternehmen

Q: Interconnection means no involvement of DSOs? Could DSOs outages impact cross borders?

A: Yes. It depends on specific case and this coordination between TSO-DSO is foreseen in OPS code.

Netherlands, RWE/Essent production

Q: The security analysis is done not on regional level only, but within control area also. Coordination of outage planning is also important for internal security analysis.

A: Since TSOs act not only in their control areas, but all together in one system, mainly coordination of interconnections on TSO level should be addressed by the code, which will not replace national regulations, which cover the internal security analysis and roles of grid users in different countries.

UK, SSE Generation

Q: Planned outages and schedules are already being sent to TSOs, why there is a need for another set of information and making things even more difficult.

A: These sets of information are going to be used by TSOs also for the purposes of this code, but we must ensure coordination on EU level, so common requirements are set for grid users having influence on crossborders.

Belgium, Electrabel

Q: Why there is a need for many common grid models?

A: There will be one common grid model, but on different timeframes. Information on different timeframes will differ.

Q: Is there a possibility to have only one grid model?

A: For each purpose, e.g. security analysis, capacity calculation purposes only one common grid model is used on pan-European level.

Q: How regional security coordination initiatives are defined?

A: The regional security coordination initiatives are defined on the basis of expertise and practice. It depends on contingency analyses and how many TSOs are affected by one contingency. Methodologies for operational security analysis will have to be developed.

Q: Could one TSO be in more than one regional security coordination initiative?.

A: Yes, one TSO can be in some regional security coordination initiatives because all TSOs are interconnected. Region is therefore well designed to cover group of TSOs and make contingency analysis.

Slovenia, ACER

Q: Could any market influence be a criterion to set a region?

A: Regions are not defined by the market, but designed to cope with physical congestions. So if market creates new congestions the regions could change.

Q: Is it correct that forward market code will use common grid model from OP&S?

A: Yes.

UK, SSE Generation

Comment: If generating facility is relevant, it needs an approval of change request of outage plan by TSO. It is a change of existing practice.

Comment: DSOs need more clear declaration of availability of generator.

Netherlands, RWE/Essent production

Q: It is not clear what outage planning agent is. Are there any criteria for agent? The concern is related to confidentiality of information. In this case confidentiality requirements should be in the code.

A: There are no criteria for outage planning agent. It could be generator itself. The term is introduced because of big variety of entities in Europe. Each grid user can nominate anybody as an agent or perform the agent functions itself. Confidentiality in this case is responsibility of grid user.

Belgium, Electrabel

Q: The outage process already exists in each country. Is there going to be common process for outage planning of EU?

A: It is not possible to harmonize all outage planning in Europe in short time. The OPS NC attempts to make the first step – to harmonize the coordination of outage planning on TSOs level.

Belgium, Electrabel

Q: Data exchange is a hot topic. How is the submission of data going to be handled in the future?

A: Data for security analysis will be in the position of TSOs and TSOs will control the data. ENTSO-E has no intention to receive the data directly from DSOs or generators.

Spain, ENDESA

Q: Is REMIT going to decide what data will be published?

A: That is correct. All information will be published in line with REMIT and EU transparency guidelines.

France, EDF

Q: Concerning transparency, the other codes treat transparency in different way. Is it intended to change the other codes, e.g. OS?

A: At the end consistency among code will be checked. The OPS NC will be updated when REMIT and transparency guidelines are published.

Belgium, Electrabel

Q: Are CACM regions the same as outage planning regions?

A: CACM and outage regions are not the same, but can coincide. The CACM regions are based on bidding zones, and outage planning is based on physical influence.

Spain, ENDESA

Q: What will happen, if outage planning coordination fails?

A: The outage planning process covers such possibilities and foresees NRAs engagement.

UK, SSE Generation

Comment: Deadline of 1st November of the year before the year ahead outage plan is too short for big outages to plan on yearly basis. For transparency reasons the requirement is to announce the outage 3 years in advance.

A: There should be some informal process earlier.

Belgium, Electrabel

Q: There is no financial compensation mentioned in the code. But technical and financial implications should be taken into account. It should be mentioned in the code that NRAs should decide on costs taking into account the financial obligations.

A: It is difficult to cover and harmonize all existing practices of financial compensation in Europe. It is not covered by FG, so it is out of scope of this code.

UK, SSE Generation

Comment: Safety obligations should be added.

Belgium, Electrabel

Q: TSOs could propose the alternative outage plan, so it imposes its decision. In that case compensation should be mentioned in the code to be based on national legislation.

A: The issue when outage plan is not agreed is covered in the code. TSO shall come with the solution to NRA and NRA will decide on the basis of national legislation.

Spain, ENDESA

Q: When incompatibility appears, TSOs can take decision to modify generation plan. Usually there are more possibilities. TSO shall justify its decision.

A: OPS code covers this issue and if TSO reports to NRA its decision, the decision shall be justified.

Austria, E-Control

Comment: FGs do not cover compensation. ACER and ENTSO-E will discuss that issue and ACER will ask ENTSO-E to remove cost recovery articles from the NCs.

Spain, ENDESA

Q: Definitions from RfG and DCC shall apply to OPS code. Why aren't all definitions in OPS NC?

A: We will not repeat the same definitions as in other NCs. The common glossary of definitions will be available for the stakeholders. The glossary will not be binding, but the terms will be binding through the network codes.

Belgium, Electrabel

Q: Definition of commissioning is not clear. Redefining the content of commissioning needed. Commissioning means to get result from the contractors. There are cold and hot phases of commissioning. In Art 24(6) and 26(6) meaning of commissioning should be clearer.

A: Distinction on hot/cold commissioning will be done.

Netherlands, RWE/Essent production

Q: Who will have an access to the data of TSOs?

A: Data will only go to the TSO, collected in the common grid model for the use of TSOs only. The information for publishing will go according to transparency guidelines. ENTSO-E operational planning data environment will be only for TSOs.

Belgium, Electrabel

Q: What is external TSO schedule?

A: This is an area where TSOs prepare schedules for TSOs in order to perform load frequency control function. This is a summary of all import/export schedules on the borders of each TSO.

Spain, ENDESA

Comment: Definition of commissioning should be improved. Not clear why a unit is not available before commissioning. Check articles 26(6) and 23(4).

Belgium, Electrabel

Q: Article 31(5) concerning ancillary services is not necessary. Ancillary services are provided by contracts, which are already covered by national contract laws.

A: This is not always covered by national laws.

Legal Comment: article 31(5) is not needed in the NC and requirements in article 41 to amend all contracts are not legally correct. This makes an impact on existing contracts. This is covered by national contract law. It is difficult to change contracts with all clients.

A: If we get contradiction of existing contract with the network code, the existing contract should be changed. Even if you have a new national law, you have to review and change the contracts, rules, conditions, etc. if they contradict.

Belgium, Electrabel

Legal Comment: referring to article 35(2), concerning operators that have no legal obligations to respect this network code. please rephrase that the provisions of this network code should be enforced by bilateral contracts.

A: This is due to countries (like Albania, Ukraine, Morocco, Turkey...) which are connected to continental Europe grid. This article will be legally reviewed.

Austria, E-Control

Q: Why scheduling should be implemented in 12 months after entry into force if this network code. Is it not implemented already today?

A: Scheduling is implemented only in continental Europe, but not in other regions.

Spain, ENDESA

Belgium, Electrabel

Comment: not clear what is a meaning of "deemed" in article 26(2). There should be "declared" instead of "deemed".

Belgium, Electrabel

Q: Why in the definition of "Netted Area AC Position" are DC lines excluded?

A: This is a set value for load frequency control in AC network. DC set values are constant and controlled separately from load frequency control in synchronous area.

Belgium, Electrabel

Q: It is not clear when unit is again available after outage.

A: After outage unit is available after declaration of the generator that it is available. It is up to generator to declare when the unit is available.

Belgium, Electrabel

Comment: In the network code in "Purpose and Objectives" there is an expression "should" in many places instead of "shall".

A: This is mentioned only in "Purpose and Objectives", which is not legally binding and only declarative.

Q: Definition on "micro isolated system" in article 1(3) is not used correctly.

A: Definition of "micro isolated systems" is in directive and only issues of DC connections are still under discussion. Only small islands are excluded from the scope of this network code.

Q: Definition on "restitution time" includes only planned outages. Why forced outages are out of scope?

A: Forced outages should be in scope.

Q: According to article 7(3) common list of scenarios should be published. Is it published all content or only summary?

A: Only summary will be published, but it should be understandable, according to transparency guidelines and confidentiality requirements.

Spain, Iberdrola

Q: In Article 26(5) concerning the request of delay of the planned outage not always delay could be done due to technical feasibility of the equipment. It should be added that the request for delay should take into account also technical feasibility. Also the delay should be compensated.

A: We agree that request should take into account technical feasibility of equipment, but compensation of outage planning is related to gaming, market power, etc. Compensation of business costs is complex issue and not in scope of this network code, it should be treated in national legislation.

France, EDF

Q: In article 26 stakeholders have a right to access the network. The right to evacuate as principle should also be covered by the code.

A: That is already defined.

Belgium, Electrabel

Q: In the definition of "outage incompatibility" it is not clear what it means "without load shedding" and what are the elements of "load shedding"?

A: It means that all last resources also contractual means are exhausted (e.g. HPSPs, contractual load, etc.) and outages are still not available without load shedding. Load shedding is mandatory disconnection of load to protect the system vitality. "Load shedding" is defined in OS NC.

France, EDF

Comment: Some points concerning involvement of stakeholder in article 15(2) concerning categorization of remedial actions and article 21(1) establishment of list of relevant grid users. The proposal is to involve stakeholders in principles of categorization of remedial actions and establishment of list of relevant grid users for outage planning.

Belgium, Electrabel

Comment: In article 21(1)b the list of information is not defined and TSOs can ask what they want.

Belgium, Electrabel

Q: The grid model is well defined and harmonized on pan European level, but on other hand the scheduling is not and refers only to national legal framework. The format for the schedules should be the same across all Europe.

A: Concerning scheduling the first step in the network code is to achieve consistency of schedules. The practice is moving very quickly with market development. Market organization is not a matter of the OPS network code, but to solve TSOs issues.

Belgium, Electrabel

Q: Also there are many different positions, such as global position, net area position, etc. Why not to have one general principle?

A: It is not good that there are different formats, but there are different rules/systems in every market and the common format will not solve this. The framework guidelines are not very explicit on that and it is not in scope of this network code.

Q: The target is to introduce an internal common market so harmonization should be linked to harmonization of market issues also. If investor wants to enter the other markets it has to change the whole concept because the scheduling is different.

A: harmonization of all markets is a long process and is not achievable in 12 months and it is not in scope of this network code

Comment: The common market concept is related to Balancing code, which look at timeframe of year 2020.

Spain, Iberdrola

Comment: There is no compatibility of deadlines regarding article 21(1) establishment of list of relevant grid users in 3 months and article 18 publication of methodology for operational security analysis in 24 months.

A: We will examine the compatibility.

UK, SSE Generation

Comment: There is no compatibility of deadlines regarding article 21(1) establishment of list of relevant grid users in 3 months and 21(4) publication of list of parties required to provide information and list of information to be provided while respecting the provisions of article 3(3).

A: We will examine the compatibility. Indicative list of relevant grid users should be established as soon as possible in order to know who the stakeholder is.

Belgium, Electrabel

Q: Regarding ENTSO-E data environment in article 37(4) and 38(2), will this become a public database, TSOs only or just partially for others too?

A: ENTSO-E data environment is only for TSOs operational tasks. The issues for publishing will be treated by transparency guidelines and published in transparency platform.

UK, SSE Generation

Q: Concerning article 21(3b), is single grid element of which aggregated availability status of relevant grid user influences cross border flows going to be defined?

A: Explanation will be given in the supporting paper; it takes into account all elements behind.

France, EDF

Q: In the new draft OPS network code generators have to send to TSOs their availability according to the outage plan. Each time changing of the plan generator should address TSO. It is additional constraint for generators; they are not free to do that.

A: Each relevant grid user has a right to modify a plan. We will examine and improve flexibility to modify a plan.

Belgium, Electrabel

Comment: the proposal is in article 24(2c) to reinforce with economical arguments and 24(2d) to reinforce with technical arguments in order to ensure that in evaluation of change request all economical and technical solutions of all parties are assessed.

A: If TSOs intervene in the change request process, there are strong technical arguments behind already. Of course all aspects should be handled.

Belgium, Electrabel

Q: Is any definition and a list of "ancillaries"?

A: "Ancillaries" are not defined and a formal list of "ancillaries" doesn't exist. It should not be a limited list, because of future developments.

UK, SSE Generation

Q: It is not clear what the year-ahead forced outage means in article 25.

A: Article 25 defines the procedure of update of year-ahead outage plan in case of forced outages during the year. It means that generators can change their year ahead outage plans if they face forced outages and the year ahead outage plan is not valid any more.

Belgium, Electrabel

Q: The OPS network code has a very close relationship with OS network code, why is it separated?

A: It is a part of network codes for system operation. OS network code is an umbrella code.

Austria, E-Control

Comment: To have this structure of the networks codes is a result of discussion among EC, ACER and ENTSO-E. If all network codes are merged we would have a "monster code" which would be very difficult to handle.

Conclusions

Yves Harmand summarized the issues discussed, thanked all the participants for active contributions, constructive discussion and many valuable suggestions and closed the 3rd Stakeholders' Workshop on the Operational Planning and Scheduling Network Code, once again **reminding to submit all comments to the public consultation tool, available on ENTSO-E webpage <https://www.entsoe.eu/resources/consultations/>**.