

4th ENTSO-E Stakeholders Workshop on Operational Planning and Scheduling Network Code (OPS NC)

Date: 14th February 2013

Time: 12h30 – 16h30

Place: ENTSO-E premises, Brussels

MINUTES

1. Agenda

9 :30-10:30	Registration/Welcome coffee	
10:30 – 10:45	Welcome Introduction	Olivier Bronckart <i>ENTSO-E Manager System Operations</i>
10:45 – 11:15	Presentations on the work done for improvement of OPS NC and supporting paper	Yves Harmand <i>ENTSO-E Convenor of OPS NC Drafting Team</i>
11:15 – 12:15	Round tables discussion per chapters with DT members	Stakeholders <i>ENTSO-E OPS NC Drafting Team members</i>
12:15-13:15	Lunch	
13:15 – 15:15	Round tables discussion per chapters with DT members	Stakeholders <i>ENTSO-E OPS NC Drafting Team members</i>
15:15 – 15:30	Coffee	
15:30 – 16:15	Summary of feedback after round tables discussion	Stakeholders <i>ENTSO-E OPS NC Drafting Team members</i>
16:15 – 16:30	Concluding remarks	Yves Harmand <i>ENTSO-E Convenor of OPS NC Drafting Team</i>
16:30	End of Workshop	

Presentation is accessible at the ENTSO-E website <https://www.entsoe.eu/major-projects/network-code-development/operational-planning-scheduling/>

2. Welcome

Olivier Bronckart, ENTSO-E System Operation Manager, welcomed the participants and shortly introduced what has been done lately and how the workshop will continue.

3. Integration of results after the 3rd Workshop

Yves Harmand welcomed the participants and presented the most important updates to the OPS code after 3rd public stakeholders' Workshops on OPS code and public consultation that was held from 7th November till 7th January 2013. Presentation is accessible on the ENTSO-E website <https://www.entsoe.eu/major-projects/network-code-development/operational-planning-scheduling/>

4. Presentation from Eurelectric

DSOs TEG presented their view on improved OPS NC.

DSOs note the latest development in certain areas of the code

- DSO considered in the recovery of costs (art. 5)
- > 'Costs which have to be borne by regulated network operators'
 - DSOs involved in coordination with TSOs on outage planning for grid elements and for users connected to their networks (chapter 4)

However, number of concerns prevail

1. Access to the TSO Grid model

- DSOs access to the parts of TSO grid model that influence their network ('DSO Observability Area') in order to prevent negative impact on the transmission system (and eventually cross-border network issues)
- The code still does not allow for it
- This information and the information about outages in DSO Observability will not be available to the DSOs within 'the Transparency Platform'!

2. Ancillary services (art. 50)

- "Each Significant Grid User and DSO shall provide information to the TSO to which they are connected on their availability to provide Ancillary Services and related capacity in accordance with the [INC RfG] and the applicable national legal framework." (art. 50.5)
- -> Which information shall be provided at which timeframe?
- -> Significant DSOs should be able to monitor ancillary services

3. Schedules from distribution network users should be communicated by the "Scheduling Agent" to the DSO so that the DSO can detect potential restrictions in advance

- *The code still does not allow for it*

Overall, DSO TEG sees the risk of non-compliance of the code with the Framework Guidelines, particularly with respect to 'coordination of relevant subjects between TSOs and DSOs (p.6)

5. Stakeholders' view, round tables discussions

Stakeholders' questions at a Roundtable 1 on Chapters: General Provisions and Definitions

Electrabel /Belgium

Is whereas section in the code legally binding because otherwise it has no legal value?

ENTSO-E: It is true that it is not legally binding but helps to explain more to the judge if needed on court. Legally binding provisions are only in the articles.

ENDESA/Spain

In supporting paper you mention most of the times that things are only TSOs business, like regarding NRA involvement...

ENTSO-E: True, as TSOs are the ones that are responsible for the security and should not transfer responsibility to the Regulators.

Is the new Article 4 now also used in the other Network Codes?

ENTSO-E: Now this article will be the same in all System Operation codes.

Electrabel /Belgium

Is it a big difference regarding Article 3 and 4 in OPS NC compared to RfG, DCC... ?

ENTSO-E: In other codes mentioned there is written much more into details as in OPS NC. This code is only applicable for operational planning activities addressing cross border issues.

What is the role of DSOs in the code? Why such a description of tasks is defined in such a complex way? Our only concern is that in the NC the boundaries between DSOs and TSOs should be defined more exact. Like who is handling daily operations...

ENTSO-E: In some EU countries DSOs are also on higher voltage level (150kV) therefore it boundaries can't be easily defined. Regarding the role of DSOs, OPS refers to role and responsibilities for Operational Security set up by OS network code as umbrella code..

ENDESA/Spain

What is the information that is considered as confidential, is that already defined? What is the level of confidentiality?

ENTSO-E: All parties in the code shouldn't give data to the third parties. Therefore the agreement should be signed between the two parties that want to exchange the information.

Comment: More clarity is needed regarding Remedial Actions, as example in the Article 17 there is no reference to other Remedial Action.

Electrabel /Belgium

Why every testing of the element/unit should be reported to TSO if there is no impact on the grid. This is not specified well enough.

ENTSO-E: Only testing of equipment with impact on the grid is addressed.

Why did you exclude environmental safety in Article 1(3). Is then security of the supply above the environment safety?

ENTSO-E: All the matters regarding environmental safety are written in the other EU or national regulations. There are no priorities between regulations set up by OPS NC.

ENDESA/Spain

Comment: In a definition Netted Area AC Position you exclude DC lines.

Comment: What is meant by explanation to provide service in the definition Availability Status, please clarify?

ENTSO-E: Explanations are developed in the definition section and in the supporting document.

CEDEC/Belgium

OPS NC doesn't have an Article 3(3) anymore that many provisions were referring to.

ENTSO-E: Now there is a new article where NRA involvement is predicted.

IBERDROLA / Spain

Is ACER informed with your new approach regarding the new article with NRA involvement?

ENTSO-E: Yes, ACER/NRAs are informed and they support this approach.

What is the approach if the code collides with the national law?

ENTSO-E: National law has to respect EU law.

CEDEC/Belgium

Will this article regarding cost recovery stay in the code? What is ACER's feedback on that?

ENTSO-E: We are waiting on the decision which CACM NC will take.

Regarding the definition Forced Outage you should take out in the explanation "for emergency" part.

ENTSO-E: We do not consider this is the right approach to cancel emergency out of this definition. Adequate improvement will be examined.

Comment: There is no specific definition for connecting DSO and connected DSO. There should be a distinction between this two in the code or describe this better in the text.

SSE Generation/ UK

How is cross border determined in the definition Relevant Power Generating Module?

ENTSO-E: This will be determined by the methodology for Relevance addressed by the code..

Vereniging Energie / Netherlands

Is there a chance in case of a change of methodology that as a generator you receive money back if the previous methodology was discriminating towards you?

Why did you include NRAs involvement regarding methodologies?

ENTSO-E: ACER wants NRAs to be included for methodology approval, so everyone is treated equally and nondiscrimination is assured.

Regarding coordination issue stakeholders have concern if it is going into right direction and if integrated market is going to be established properly throughout the EU.

ENTSO-E: More on that topic is explained in the supporting document.

Gas Natural Fenosa/ Spain

There is a concern that OS and OPS NCs leave a lot of freedom to TSOs and in the end it can happen that nothing will change with these codes.

ENTSO-E: For all processes, clear requirements are expressed on TSOs issues enforcing effective and strong cross border coordination within a global framework involving respectively the 3 layers European, synchronous zone and regional ones as exposed in the supporting document.

Stakeholders' questions at a Roundtable 2 on Chapters: Data, Security analysis, Adequacy, Ancillary services, Scheduling, ENTSO-E data environment, Performance indicators

What is difference between Transparency platform and ENTSO-E environment? Both are developed by the ENTSO-E. Do stakeholders have and access to ENTSO-E data environment?

ENTSO-E: ENTSO-E data environment is a tool only for TSOs, because it contains sensitive information for the market. Information required for transparency will be published in Transparency platform and will be available to all market participants.

Why weekly adequacy report is not published? Traders want it to be published; generators think that it could distort the market.

ENTSO-E: Weekly adequacy report could influence and distort market.

According to DSOs opinion the OS NC doesn't cover information exchange from TSOs to DSOs concerning the DSOs observability area. Data in the connection point only is not enough to DSOs.

ENTSO-E: Data in the connection point covers information about the TSO grid needed for DSO security analysis in DSOs network.

What is added value of Ancillary services chapter in OPS NC? Active power reserves are covered by LFCR NC, purchasing rules in Balancing NC.

ENTSO-E: The purpose of the chapter on ancillary services is to set obligation for TSOs at a planning phase to review the availability of all kind of ancillary services.

Not clear the way to construct Common grid model.

ENTSO-E: The objective of the OPS NC is to set requirements to build the CGM to be used by all TSOs for coordinated security analysis and capacity calculation. How to build it is an implementation issue and will be analyzed by the working group in order to develop the most efficient way and tools. The way to construct the CGM is more "how" than "what" and is not a matter of this NC.

Not clear if in Article 53(2) scheduling agent of market coupling operator should also submit information as in Article 53(1).

ENTSO-E: The article 53(2) sets requirements only for scheduling agent of market coupling operator and article 53(1) to all scheduling agents except scheduling agent of market coupling operator.

Why only generation adequacy is covered by OPS NC? Transmission adequacy is missing.

ENTSO-E: After coordinated security analysis on the basis of CGM, new methodologies will take into account also transmission adequacy. This is already covered by TYNDP.

Not clear in Article 50(5) what kind of ancillary services shall DSO provide to TSO. It should be changed not to interpret as additional information from the stakeholders.

ENTSO-E: There is no intention to ask for addition information from DSOs and stakeholders concerning ancillary services. The article should be redrafted.

What is added value of Chapter 9 Performance indicators? It is covered in OS NC.

ENTSO-E: This is requirement from FG.

Why tools for DSOs to control voltage are not covered?

ENTSO-E: Voltage control in DSOs networks should be covered by national grid codes for distribution networks. This NC is developed only for cross borders issues, but voltage and reactive power control has a local character.

Stakeholders' questions at a Roundtable 3 on Chapter: Outage Coordination

Comment: Clarification is needed of what CGM means. it is not always clear that the principles for building and using the CGM will be the same.

OFGEM / UK

Clarification is needed about the application of the methodologies and timing for NRA involvement which need to be developed.

Eurelectric

In the OPS NC there is no access to Transparency platform predicted for DSOs. Could it be clarified who will have access, because it says only for market users. Transparency platform will not cover all data needed for DSOs because it is only covering information on capacity impact. It should be clear that no national legislation will avoid the DSOs getting this information. DSOs would like to have a kind of a general principle that they will receive the data they need from TSOs.

Can we have Relevant Asset which will not be public?

ENTSO-E: Normally not, because Transparency guidelines ask for more detailed information than Relevant assets.

Why outage planning agent?

ENTSO-E: 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.

Don't we need an outage coordinator?

ENTSO-E: The role of outage coordinator for the cross-border issues is performed by TSOs.

Coordination process: isn't a possibility to say that harmonisation of compensation should be developed within a given period?

Update of year ahead planning: the process could be understood that the principle of yes by default is not true and that every time coordination process will be initiated. We miss also timing for the approval

ENTSO-E: The process will only be initiated if detected Outage Incompatibilities cannot be resolved by non-costly Remedial Actions in the hands of the TSO, this will be further clarified. We agree that adding timing is a good idea, but this should be investigated as this adds lots of complexity and might not be in line with current best practices in all systems.

Could you explain the difference between capacity calculation and security analysis?

ENTSO-E: Clarification on the difference of capacity calculation and security analysis is given: Capacity calculation aims at defining domain of feasibility while security analysis aims at optimising remedial actions to ensure the operation of the best forecast situation.

What about the number of NRAs to approve and what if NRAs don't agree?

ENTSO-E: This is covered in Article 4. The ACER shall decide upon those regulatory issues that fall within the competence of National Regulatory Authorities as specified under Article 8 of Regulation (EC) N° 713/2009.

Can you explain the idea of the size of units involved?

ENTSO-E: The size of the unit involved in outage planning depends on the characteristic of the system and the location of the unit.

Comment regarding a provision of information: Stakeholders would like to clarify that there is only one SPOC and not to have to send information to 2 entities when directly connected to DSOs. Then, it could depend on country if it is TSO or DSO. DSOs say they would like to be the SPOC for units connected to their grid.

What about the information of relevant grid asset which can affect generator?

ENTSO-E: Information exchange is covered by the NC OS and Transparency Regulation.

Consistency of data exchange?

ENTSOE is working on governance principles defining principles for data exchange which will allow optimising it and avoid inconsistency and redundancy.

TSOs will have to anticipate potential problems if they are and to have information from 3 till 1 year ahead. Stakeholders would like to have this assessment every 6 months instead of 12 months.

ENTSO-E: to be assessed as this might need significantly more resources for the TSOs.

Definition of testing periods: what means testing?

ENTSO-E: Only testing of equipment with impact on the grid is addressed. This will be clarified in the code

Comment: Communication of details of testing periods 2 months in advance is difficult, there should be more flexibility.

ENTSO-E: This comment will be considered. To be assessed whether this period can be reduced.

Comment: In the coordination process and assessment of incompatibilities, not only technical or economical impact needs to be taken into account, but also contractual, regulatory, etc...

ENTSO-E: It will be considered how this can be taken into account in the drafting of the code.

Formulation Article 44(3) is not clear, how a TSO can tell a grid user when he has to be connected?

ENTSO-E: Formulation will be reviewed.

Definition of forced outage is not completely symmetrical when reading art 44(3). Emergency should not be used but any problem. Definition needs to be clarified. Emergency could be put out of the definition - "Out of control of operator or owner of generating unit"

ENTSO-E: the definition will be reviewed to make this clear.

Validation of year ahead planning on 1 December is too late. It already influence the outage plans of January of the next year. Why not 1st November?

ENTSO-E: currently the 1st of December is the current practice in a large part of Europe. Changing this might have significant operational impact. The concern is understood however, and it will be assessed if a change of the deadline is desirable and feasible.

Deadlines in Articles 20 and 22 need clarification. What is the link with the creation of regions? There should be a picture of the total timeline.

ENTSO-E: Clarification is given that the methodology for Relevant Assets will be approved by NRAs and the list is the consequence of methodology. A relevant asset will be handled in only one Outage Planning Coordination Region. Timelines will be reviewed to result in a consistent set. An overview of the global timing picture will be included in the supporting document.

Concerning availability status, it was clarified that only relevant asset should be addressed and not all transmission lines.

Why ancillary services are included in the definition of the availability status?

ENTSO-E: this is a leftover from former drafting and will be deleted as it has no more use.

Comment: In Article 31 commissioning issue is better now than in previous version.6. Summary of round tables discussions

General provisions and Definitions round table:

1. Some definitions need to be further improved in wording.
2. Cooperation/coordination with stakeholders, DSOs. Should be two way channel for data exchange.
3. Methodologies, the way how to amend is not clear at the moment. Will be discussed also within DT, ACER and also stakeholders.

Security analysis/scheduling/data exchange/adequacy/ancillary service round table:

1. There is a need of understanding of added value of the Article 50 concerning ancillary services.
2. Coherence of scenarios to be clarified in supporting document.
3. Definitions of outage to be further improved.
4. Control of reactive power for DSOs is not in a scope of FG for OPS.
5. Comments on scheduling wording improvement have been received.

Outage coordination round table:

1. Timelines of methodologies, to be explained in the supporting document.
2. Valuable proposal received on definitions, incompatibilities and consistency between articles.
3. Further clarification on the way the coordination is based on current national practices seems to have been well received.

7. Conclusions

Yves Harmand thanked for all the comments and explained that they will be taken into account as far as possible when addressing blocking issues. Also the following process of network code finalization was explained to stakeholders.

DSOs raised a question of data exchange, it was concluded that draft team will take this into consideration and decide whether to make further improvements in the code

Erik Dekinderen and other stakeholders noted that they appreciated the way the DT OPS consulted with the stakeholders and congratulated the DT for the significant improvement of the draft code and the way the comments of stakeholders have been taken into account.

4th Stakeholders Workshop on the Operational Planning and Scheduling Network Code was closed by general applause of the participants.