EURELECTRIC views on the ENTSO-E NC Operational Planning & Scheduling

ACER public stakeholder workshop

23. April 2013

A more balanced code compared to previous versions

- **Between TSOs' need for coordination, in relation to system security management, and constraints on users :**
  - **The code applies only to units potentially involved in x-border incompatibilities (Relevant Units)**
  - **A common timetable and process are needed for planning operations, but national practices still apply to a large extent**

A good balance between the need for TSOs to coordinate, for the purpose of system security, and the constraints imposed on users : coordination in place only when necessary

- **Between TSOs and users in case of Incompatibility :**

wording such as "TSO can impose" has been withdrawn

Interaction with other regulation is crucial

- **With other codes :**
  - **Operational Security code, "the umbrella code"**
    - **References to this code should be more precise**

      ***Illustration* : violation of operational security limits (i) is a key concept for defining outage incompatibility (ii) but nevertheless does not refer to one of the specific system states defined in the OS code**
  - **& usual consistency required for definitions, methodology, region/area (outage coordination area, scheduling area, bidding zone, responsibility area…)…**

- **With other regulations (transparency…)**
  - **Maximum coherence is needed between regulations, so that the same data is not asked twice or more :**
    - **No useless burden for users**
    - **Only one reference for each data shared by all parties**
  - **Consistency among data would then be evident**

Respective roles of TSOs & NRAs

- **TSOs bear without any doubt the responsibility for System Security**
- **A large part of the code is involving TSOs on the front line, but network users are not very far behind…**
- **Consequently, NRAs should be involved in BOTH defining and supervising the application of the methodologies**
    - **Repeating that in this code wouldn't be useless**

Impacts for generators should be clarified as soon as possible and limited

- When an incompatibility arises following an update of the planning :
  - A coordination process is managed by TSOs in order to solve the issue
  - Principles guiding the management of the issue are not clear enough
  - The principles should refer to :
    - Minimizing the impact on the market
    - Targeting the most efficient global solution, which might involve a TSO planning update
  - Processes and their related obligations should clearly state the above principles

- List of Relevant Users is a key element for generators' impact assessment:
  - Deadlines for defining the methodology (12 months after entry into force) and implementing the application (15 months) are late

- In some circumstances, planning process may lead to a situation where the Outage Planning Agent knows only on the 1st December that he has to adapt its program for the 1st January : this is a too short period to reschedule (Art. 39)

- Real-time execution of the Availability Plans should be under the responsibility of the Outage Planning Agent and not under the Power Generating Module Owner (Art. 46)

Outage Incompatibility

- **Successive draft codes went the right way**
- **The definition of Outage incompatibility didn't follow the same path :**
  - **Previous definition referred to load shedding**
  - **The current definition refers to violation of system operational limits**
    - **It looks as a much more common situation…**
    - **… And consequently as potentially additional costs for generators**

Level of harmonization

- **Appliance of national practices is satisfactory provided it does not jeopardize fair competition between generators (this point should be checked)**
- **The above point is more significant in case of a x-border Outage Incompatibility**
- **Data format for exchange of information between grid users and TSO should be harmonized in all European countries in order to remove entrance barriers and reduce costs to operate in several European countries**

Lack of transparency

- **ENTSO-E Operational Planning Data Environment should be available to stakeholders (Art. 58)**

- **Analysis on adequacy should be shared with stakeholders and market players (Art.51 §3)**

Conclusions (1)

- **A code much more balanced between ENTSO-e and users than previous versions, in particular first versions**

- **EURELECTRIC welcomes the improvement but :**
  - **A lot of time and energy was spent, and this should be avoided by a reasonable approach taken from the beginning by ENTSO-e**
  - **This time and energy could have been saved for accessing other more specific points, in this globally heavy process**

Conclusions (2)

- **The process of development of the codes is improving code after code :**
  - **Workshops were constructive**
  - **A complete (unrivalled among codes?) supporting document, including an impact analysis**
- **Some information would be very helpful if available earlier in the process :**
  - **Impact analysis based on the various draft versions of the code released should be made available**
- **We are only in the middle of the story :**
  - **ACER opinion and/or recommendation and comitology still to come**
  - **Practical consequences for users are not obvious and depend on the implementation**

Stakeholders involvement is still needed :
EURELECTRIC is ready to take part