

4th System Operation European Stakeholder Committee (SO ESC) Meeting

Wednesday, 7 March 2018 from 10:00 to 15:00

Martin's Brussels Hotel, Charlemagne 80, Brussels 1000

Draft Minutes

Participants			
Uros	GABRIJEL	ACER	Chair
Jakub	FIJALKOWSKI	ACER/E-Control	
Jérémy	VINCENT	ACER/CRE	
Maria Eugenia	LEOZ MARTIN-CASALLO	European Commission	
Tahir	KAPETANOVIC	ENTSO-E	
Jean-Philippe	PAUL	ENTSO-E	
Maria	SANCHEZ LLORENTE	ENTSO-E	Via webstreaming
Sonya	TWOHIG	ENTSO-E	
Kristel	ROMEO	ENTSO-E	
Stela	NENOVA	ENTSO-E	
Rafal	KUCZYNSKI	ENTSO-E	
Bruce	RIDDINGTON	ENTSO-E	
Michael	WILCH	EDSO for Smart Grids	
Sebastien	GRENARD	EDSO for smart grids	
Luca	GUENZI	EUTurbines	Via webstreaming
Eric	DEKINDEREN	VGB Powertech	
Klaus	OBERHAUSER	VGB Powertech	
Daniel	FRAILE	WindEurope	
Sanni	AUMALA	EURELECTRIC	
Ellen	DISKIN	EURELECTRIC	
Thomas	LESCARRET	EURELECTRIC	
Markus	WATSCHER	EURELECTRIC	Via webstreaming
Stein	ØVSTEBØ	IFIEC	Via webstreaming
Christian	RAUNIG	GEODE	
Florentien	BENEDICT	CEDEC	
Brittney	BECKER	EASE	
Pavla	ERHARTOVA	Europex	
Leonardo	MEEUS	FSR	Item 6

1. Opening

1.1 Welcoming Address and Draft Agenda

The Chair, Uros Gabrijel (ACER) welcomes the participants to the 4th SO ESC meeting. The draft agenda is approved.

1.2. Review and approval of the minutes from previous meeting

The minutes of the 3rd SO ESC meeting are approved without further comments (available [here](#)). Eric Dekinderen (VGB) proposes a comment related to the discussion on communication lines at the 3rd SO ESC, which will be addressed under AOB.

1.3. Follow-up actions from previous meeting (slides available [here](#))

Action 1: Update on high-level implementation group will be provided under agenda item 1.4.

Action 2: KORRR update - during February, ENTSO-E contacted different stakeholders that have provided comments to the public consultation and discussed with them how their comments were taken into account in the methodology.

Action 3: ENTSO-E will provide an update regarding the final draft version of the KORRR methodology for submission to NRAs under agenda item 2.

Action 4: CGMMv3 - The response to public consultation comments, including who has provided the comments will be published together with the proposal on the ENTSO-E website. The input received for the purpose of the consultation has been sufficient.

Action 5: CSAM: ENTSO-E plans to provide further information on the upcoming CSAM processes, including the possibility to have a follow-up with stakeholders after the end of the formal consultation, if needed. This will be decided after the initial analysis of the comments received during the consultation.

Action 6: ENTSO-E has taken on board the request for a longer consultation period for the CSAM and for a more detailed stakeholder workshop. The consultation period is 6 weeks (from 26 February to 6 April).

Action 7: ENTSO-E is organizing a stakeholder workshop during the formal consultation period for the CSAM in order to explain to stakeholders how to understand the proposals and answer questions on 21 March 2018.

Action 8: ENTSO-E has provided Florentien Benedict (CEDEC) with a written response regarding the questions raised for the CSA workshop. The response was discussed further in a meeting with DSOs on 28 February and is acceptable.

Action 9: For each public consultation, ENTSO-E provides an explanatory document together with the proposals in response to the comments received during public consultations.

In addition to the explanatory document, Michael Wilch (EDSO) would like to see an explanation with a cost-benefit analysis showing why certain decisions are preferred as opposed to alternatives. Daniel Fraile (WindEurope) supports this request as topics may be very technical, and stakeholders find it difficult to understand the decisions taken; such supporting analysis of the various options would be very useful on complex topics like inertia or other NC issues.

ENTSO-E will consider the request based on topics identified and can provide additional input and specific analysis where deemed necessary on an ad-hoc basis, as otherwise this might slow things down if it has to be done for every single proposal. The Chair concludes that item 9 is considered closed.

Action 10: Forward planning in 2018: The timeline for the inertia-related stakeholder activities has been updated to include the workshop in May 2018 as part of the ENTSO-E roadmap on developing inertia studies.

Action 11: CBA FCR consultation period was extended as requested at the 3rd SO ESC, and the workshop was moved earlier in time (to 15 January).

Action 12: Q&A Logger: the status of the updated response to the question on references to art. 17 GLDPM and CACM and SOGL has been updated to green in the tool.

Action 13: KORRR: the EC would provide an update regarding the question on the definition & interpretation of "existing/new SGUs" and how they should comply with the respective requirements across the CNC and the SOGL under agenda item 5.

Action 14: Stakeholder feedback and proposals on the consultation process document has been gathered through the ENTSO-E stakeholder survey in January 2018. Further update on the topic will be provided at the joint SO-GC ESC session on 8 March.

Action 15: The 4 questions as raised by VGB and Eurelectric have been recorded in the issue Q&A logger as cross-code issues for SO and GC and will be discussed jointly with the GC ESC and SO ESC in the joint session on 8th March.

1.4. NC High-Level Implementation Group

The High-level implementation group is meeting on 8 March. The outcomes of the meeting will be published on the websites of the EC, ACER and ENTSO-E. The topics on the agenda include monitoring and transparency, updates from ENTSO-E on NC implementation, data provision agreement with ACER, tracking of regional proposals by ENTSO-E, among others. **ENTSO-E will inform the SO ESC when the minutes of the meeting are published.**

2. SOGL implementation:

2.1. Updates on ongoing activities: KORRR

Maria Sanchez Llorente (ENTSO-E) provides an update on the KORRR methodology and explains the main changes made by ENTSO-E in the final document to reflect stakeholder comments received during the consultation process (presentation available [here](#)). ENTSO-E has offered stakeholders the possibility to discuss how their comments are considered prior to submission of the draft to the NRAs. Contacts with stakeholders took place between 1st and 14th February 2018. The main changes introduced after the public consultation include the deletion of a number of articles (some of them are already covered under SOGL or must be grouped as they are related to the same topics, or according to comments from the public consultation, should not be in the KORRR), amendment of some articles to state "agree" in case of exchanges of information between DSOs and TSOs, and clarification of some articles and definitions (real-time data, observability area etc.). The final draft, as approved by all TSOs, will be submitted to NRAs by the 14 March deadline.

Michael Wilch (EDSO) and Sanni Aumala (Eurelectric) request ENTSO-E to publish the draft submitted for NRAs approval, if possible.

Florentien Benedict (CEDEC) notes that DSOs will need to fulfil certain requirements of SOGL, KORRR and have to deliver on time the required documents to NRAs, so it is important to know of any expected changes in the timelines in order to be able to comply with the deadlines.

Sebastien Grenard (EDSO) points out that DSOs have 6 months to develop information systems, which may be too short to fulfil these requirements, considering the final text is not known yet. Some DSOs started development of information systems ahead of time to be ready by 2019, as it takes long time to develop information systems, and the 6-month time-period seems unreasonable to manage.

Michael Wilch (EDSO) underlines that transparency on the content of the KORRR is needed, for example for SGUs and SGU assets, if something will impact them, they need to know as soon as possible to be able to take appropriate action.

Tahir Kapetanovic (ENTSO-E) explains that most of the data exchange is available and running already. There are no expectations for significant new requirements from the methodology (only about 20% would be new ones) – the purpose of the methodology was not to invent but mostly amend existing requirements.

Jakub Fijalkowski (E-Control) clarifies the all-NRA approval process. The timetable after submission to the NRA requires max 6 months for NRAs to approve, and if they do not all agree, then process lands with ACER's Board of Regulators for a decision. The 6 months are counted as of the date of the last NRA receiving the document from the TSO. ACER is collecting those notifications. If the NRAs agree to approve the methodology, they issue nationally decisions, which are semi-identical in content. If the NRAs disagree with the proposal but agree to issue a request for amendments, TSOs have 2 months to update the document. If NRAs disagree on the proposal and on the amendments, the process lands with ACER. Therefore, the KORRR methodology as submitted to NRAs could likely not be the final version. The question is to what extent decisions can be based on a document that is not yet certain or how much time one has to implement requirements if the document is approved and published very late. This is a governance and structural problem existing also in other codes, in CACM for example (CCR decisions first then subsequent amendments slow down the original implementation timelines). NRAs will take a note of this.

Sonya Twohig (ENTSO-E) clarifies that according to SOGL, when ENTSO-E submits the proposals for methodologies, they have to be published: the KORRR methodology will be published together with the explanatory document on the ENTSO-E website.

2.2. CGMM

The CGM methodology has been approved by all TSOs for submission to the competent regulatory authorities and the deadline for submission to NRAs is 14 March.

2.3. CSA

Jean-Philippe Paul (ENTSO-E) provides an update on the timelines for developing the methodologies for coordinating security analysis and for assessing the relevance of assets for outage coordination. A public consultation is running between 26 February and 6 April 2018, and stakeholder workshop will take place on 21 March 2018. The deadline for submission of the methodologies to the NRAs is 14 September 2018.

2.4. FCR minimum activation time

Jean-Philippe Paul (ENTSO-E) provides an update on the CBA methodology for FCR minimum activation time. A public consultation ran between 10 January and 18 February 2018. The all-TSOs approval for submission to the regulatory authorities is in progress.

2.5 Forward planning for activities in 2018

Kristel Romeo (ENTSO-E) provides an overview on the upcoming consultations and workshops planned by ENTSO-E in 2018 (slides available [here](#)). Two consultations, on the CSA methodology (SOGL art. 75) and the methodology for assessing the relevance of assets for outage coordination (SO GL art. 84), are running in parallel between 26 February and 6 April 2018.

A public consultation will take place between 3 April and 3 May on the methodologies, conditions and values included in synchronous area operational agreements (as per SO GL art. 118), accompanied by a public workshop on 13 April. A workshop on Dynamic stability assessment and minimum inertia (SO GL art. 38-39) is also planned for 23 May 2018.

Daniel Fraile (WindEurope) asks if ENTSO-E foresees a consultation on system inertia.

Tahir Kapetanovic (ENTSO-E) explains there are two obligations for ENTSO-E – first for all TSOs of a synchronous area to conduct a study to determine the need for minimum required inertia by 14 September 2019 (Article 39). This study may give a basis for the development of a methodology for determining the minimum required inertia, if proven that it is needed. Second obligation is on each TSO to monitor dynamic stability of the transmission system; i.e. TSOs shall coordinate their studies (Article 38). TSOs are working on these issues in a dedicated working group at ENTSO-E level. No consultations are foreseen for that task but the stakeholder workshop in May will provide more insight.

Daniel Fraile (WindEurope) notes that when TSOs perform a study on inertia, grid users are also relevant, and TSOs need to consider and discuss various scenarios with them. This would help TSOs to come up with scenarios that would be widely accepted by stakeholders.

The Chair reminds that the issue of inertia was widely discussed in the joint session in the previous meeting. The common understanding is that the inertia studies, along with the assumptions, will be presented and discussed with stakeholders with a view to improve and inform the studies, and that workshops would be organized. The studies as such would not be publicly consulted but stakeholders would have the opportunity to follow and comment the assessment and the assumptions. He reminds of the inertia roadmap by ENTSO-E as developed and discussed by both ESCs before.

Jakub Fijalkowski (E-Control) notes that a methodology, if considered necessary, will be submitted for approval to all NRAs of a synchronous area. The process is that TSOs notify the study to NRAs, and if NRAs have concerns, they will consult stakeholders, so this safeguards the process from an NRA perspective.

3. Emergency and Restoration NC implementation roadmap: update on implementation activities and forward planning

Rafal Kuczyński (ENTSO-E) explains the major milestones for the implementation of the ER NC at national, regional and pan-European level (slides available [here](#)). A number of requirements need to be implemented by each TSO at national level and to be approved by the NRA in line with Article 4.2 of NC ER. At regional level, each EU TSO when designing a system defence plan and restoration plan should ensure consistency of the measures within its SA and with neighbouring TSOs belonging to another SA (Article 6.1) and transmit those measures to the relevant RSCs, which will then produce a technical report on the consistency of the measures (Article 6.2). In addition, all TSOs of each capacity calculation region should agree on a threshold above which the impact of actions of one or more TSOs in the emergency, blackout or restoration states is considered significant (Article 6.3).

There are requirements for relevant DSOs and SGUs as per Article 23.4 and for restoration service providers to be able to make available the necessary critical tools and facilities for at least 24h in case of loss of primary power supply (Article 42.1). The list of measures to be implemented needs to be ready by December 2018 as part of the restoration plan, which is then notified to the NRAs. ENTSO-E has the task to monitor ER implementation on parameters such as consistency assessment of system defence plans and restoration plans, harmonisation of rules for suspension and restoration of market activities, among others (Article 52). The most important task for TSOs at this stage is to define the substations list and the plan and how to prepare the backup supply which should be able to ensure at least 24h in case of loss of primary power supply.

Eric Dekinderen (VGB) asks for a more detailed explanation on what “make available critical tools and facilities” means in that context (ex. is it interconnectors or others).

Tahir Kapetanovic (ENTSO-E) clarifies that under SOGL, it is meant SCADA system, automatic fault management, not primary or secondary technology, but just the software to operate the system.

Eric Dekinderen (VGB) also asks how the TSOs see communication in the future, e.g. windfarms using public internet or in case of a longer blackout for 12h? He points out TSOs would need a private internet network surviving for 24h in case of a blackout.

Rafal Kuczyński (ENTSO-E) explains that each TSO defines a list of SGUs which are important for the restoration. It is up to each country to define which wind farms or PV or other types of generators should be on the list and need to have the 24h back up supply for communication. The TSO needs to establish the system within the next 5 years to ensure the communication with them. There are different solutions across Europe on how the operation of different types of processes is handled, but first each country ensures the principles internally, then the TSOs agree on how they contact each other in case of a blackout.

Jean-Philippe Paul (ENTSO-E) clarifies that the principle is to identify the SGUs that are critical and to establish appropriate communication with them. This needs to be taken into account at national level. The TSOs need the communication lines only for the ones which are identified as critical elements.

Jakub Fijalkowski (E-Control) recalls that for the ER NC majority of implementation is national, and all methodologies are developed at national level and go through a process of NRA approval. He asks if ENTSO-E sees the need for coordination on how TSOs approach big plants' communication across countries.

Tahir Kapetanovic (ENTSO-E) clarifies that this stays purely national but the RSCs will assess the consistency of selected measures (Article 6.1) on the restoration and defence plans and will be tasked to produce a technical report on whether the national plans are consistent with each other. It is important to make sure that the principles are applied in the same way within and beyond the synchronous area, and consistency is ensured despite borders. This also covers the Energy Community area. TSOs are working on this already as part of the RSC implementation project.

Rafal Kuczyński (ENTSO-E) clarifies that under art 6.1, the objective for all TSOs is to have common understanding, to agree which kind of information has to be exchanged etc. Implementation is afterwards country by country.

Thomas Lescarret (Eurelectric) inquires about the links with market in ER NC, CEP and the Risk Preparedness Regulation: as markets become more and more integrated in Europe, countries can't deal alone with their problems and have impact on their neighbours. If one action provided by one TSO has a financial consequence, this financial consequence has to be compensated somewhere. He wonders if this might be addressed in the RPP in the future.

Eric Dekinderen (VGB) notes that the ER, albeit not a financial code, has a sentence on financial neutrality of each TSO which has to be ensured.

Maria Eugenia Leoz Martin-Casallo (EC) reminds the ER is in the focus now while RPP is different and should be kept in mind for the future framework. In ER the financial neutrality is related to market suspension rules and imbalances settlement.

Eric Dekinderen (VGB) requests further clarification on the financial aspect. In BE, the DSOs are obliged to compensate each low voltage customer in case of lack of power during a 4-6h period. If one has to pay for each low-voltage and medium-voltage customer, it is a significant amount of money. If a TSO has made a fault or a blackout, what happens with the financial neutrality?

Tahir Kapetanovic (ENTSO-E) clarifies this is linked to aspects such as quality of supply and incentives regulation, value of lost load or other measures. This cannot be improved in the current code, and there are differences in the regulatory regimes across Europe.

Pavla Erhartova (Europex) asks for clarification on the link with Article 39 and monitoring requirements regarding the level of harmonization of the rules for imbalance settlement in case of market suspension. Market operators should be considered in this discussion.

Maria Eugenia Leoz Martin-Casallo (EC) notes that the question of harmonization can be taken up as basis for amendments in the future or for further legislation, based on the report to be produced by ENTSO-E during the monitoring phase.

Jakub clarifies that financial compensation concerns mostly imbalances, there are different regulatory regimes across countries. Given the degree of differences in those rules, this has been consciously left national- in the next steps it can be seen if there is a need to cover this issue and how.

Jean-Philippe Paul (ENTSO-E) clarifies that ER obliges each country to define the regime for imbalance settlement, during market suspension, but liability, penalty provisions are not part of ER.

Regarding Article 23, Eric Dekinderen (VGB) would like to know when do TSOs plan to consult other stakeholders as there are implications concerning the assets and financial matters regarding the restoration plans. He asks if ENTSO-E can present an overview on when the TSOs plan to conduct public consultations in each MS.

Rafal Kuczyński (ENTSO-E) explains that NC ER list is national. ENTSO-E is not collecting schedules for the various countries and each TSO has their own implementation schedule, depending also on national specificities.

Michael Wilch (EDSO) notes that ENTSO-E has an obligation to coordinate, so it would be beneficial to have an overview of the consultations and timelines as part of its monitoring implementation of NCs.

The Chair invites ENTSO-E to collect national implementation plans and make them available on its website, for example via the Active Library tool.

Thomas Lescarret (Eurelectric) reminds of Eurelectric presentation at the SO ESC in June 2017 on the scope of what would be useful to follow from a stakeholder point of view. He invites ENTSO-E and the SO ESC to take the opportunity already now to discuss about steps for further harmonization between countries from a forward-looking perspective.

Sonya Twohig confirms ENTSO-E will look at how this is done for the CNCs and update the SO ESC at the next meeting on further actions.

Sebastien Grenard (EDSO) asks about how Article 15 should be implemented. As it is today, there can be different interpretations and it seems not so clear how the under-frequency measurement is defined in each country.

Rafal Kuczynski (ENTSO-E) explains that on LFDD it is not clear what 150ms means according to DCC. For Continental Europe (CE), there is an agreement – the Operational Handbook Policy 5 – which stipulates the total time between an incident and disconnection to be 300ms. The amount of total load to be disconnected is also to be coordinated under ER. The proper interpretation is under discussion with other colleagues and with some companies that deliver protection devices.

Sebastien Grenard (EDSO) notes that regarding LFDD, there is an issue on the range of demand asked to disconnect – it appears that with the LFDD scheme, the amount asked is not achievable across Europe. The ER is asking for a strict range of disconnection, and a decision on this should be taken by end-2018. DSOs know they can't fulfil requirements of annex I. They would like to know what choices are across countries and what happens if anything occurs and the provision on disconnection is not respected.

The Chair concludes that both regarding the transparency in the NC ER implementation and on technical differences on the achieving the parameters in the NC ER ENTSO-E will provide answers at the next SO ESC meeting.

Thomas Lescarret (Eurelectric) notes that at the informal brainstorming Eurelectric workshop in Brussels on 31 January 2018, a CENELEC representative wondered how a more formal answer to a stakeholder question could be ensured in the ESCs.

The Chair clarifies that regarding answers to stakeholder questions, in the Q&A logger tool, if all parties agree and if there is no disagreement on an answer and no one else has to contribute anything else to the answer, it is provided a 'green' status in the tool. If there are disagreements on the answer and no convergence of opinion on it, the status of the answer is yellow; if the query is ongoing, it appears blank in the tool as no answer is provided yet.

4. Q&A logger tool - follow-up on questions from previous meeting

Stela Nenova (ENTSO-E) provides a brief overview on the updates to the SO ESC-related questions in the Q&A logger tool (3 questions raised at SO ESC and 4 joint cross-code questions from SO and GC ESC). As a follow-up on action 12 of 3rd SO ESC, the status of the updated response to the question on references to art. 17 GLDPM and CACM and SOGL has been updated to green in the tool.

The only SO ESC-related question that remains open in the Q&A logger tool (with a yellow status) as raised at 1st SO ESC is the question on the definition & interpretation of "existing/new SGUs" and how they should comply with the respective requirements across the CNC and the SOGL. The EC will provide a further update to the question under agenda item 5. No other stakeholder contributions to the question have been received.

The four cross-code questions as raised by VGB and Eurelectric at the 3rd SO ESC meeting will be discussed as part of the joint SO-GC ESC session on 8 March 2018.

A guide on how to understand and interpret the answers in the Q&A Logger tool is available in the tool [here](#).

5. Joint DSO contribution

5.1. Retrospective requirements

5.2. Minimum or cap data requirements

Michael Wilch (EDSO) explains that DSOs have observed in first consultations on SOGL and art. 40(5) in Germany that some TSOs' data requests go beyond the set of data foreseen in SOGL (slides available [here](#)). This concerns mainly the request for data concerning Type-A-generators, data of storage other than pumped hydro, and data of SGUs, which appear to be exceeding what is laid down in art. 44 and 47 to 51 of SOGL. The DSOs' understanding is that SOGL cannot be used as a justification for requesting more data than described in the SOGL articles and that more detailed provisions could be provided at a national level, where considered proportionate and justified by the NRA, as long as they are not in conflict with the NCs.

Michael Wilch (EDSO) asks if the SO ESC can agree with the statement that the set of data described in Article 44 and 47 to 51 SOGL is the maximum set of data TSOs can request from grid users on the basis of system security needs. Neither the SOGL nor any national law entitles TSOs to request a larger set of data than described in SO GL from SGUs or data from grid users which are not explicitly designated as being significant in SO GL.

Jean-Philippe Paul (ENTSO-E) notes that most of this discussion is linked to national issues pertaining to additional data for local needs, which should be acceptable as long as it is consistent with the law.

Maria-Eugenia Leoz Martin-Casallo (EC) clarifies that in Article 44 and Article 47 to 51 for SOGL, SGUs are required to provide at least the following data, so setting minimum requirements is not a cap on what can be requested. In this case it is for the NRA or the competent authority to assess the TSO request and see if it is proportionate or not, i.e. BNetzA should check if the request is in or outside the scope of SOGL. It is the minimum basis that needs to be applied across all MS. The issue should be brought to the attention of the NRA with an explanation of why it is not proportionate.

Jakub Fijalkowski (E-Control) explains that Article 40.5. provides for national approval of scope and applicability of data exchange as based on ACER recommendation. It was decided to make it more flexible to accommodate the different needs that MS may have concerning the data, and to ensure proportionality.

The Chair concludes that there is no consensus on the statement proposed by DSOs and recommends to relevant stakeholders to bring this issue to the attention of the concerned NRA. If the case turns out to be relevant for European implementation, the issue can be escalated to the SO ESC.

Ellen Diskin (EURELECTRIC) explains the DSO's concern on the implementation of SOGL (slides available [here](#)), which should respect economic optimisation in realising the objectives of secure system operation. According to art. 4.2 of SOGL, the actions of NRAs and TSOs should be necessary to achieve the objectives of the regulation and be efficient, non-discriminatory and proportionate. There seems to be no legal basis for the exclusion of communication lines as related to the requirement. The ENTSO-E answer at the 3rd SO ESC on real-time data exchange capability from existing installations and the need for declaring the capability and providing a justification does not seem to be compliant with SOGL. Even if it is accepted that a communication line is not a capability, that should not preclude its consideration in economic justifications as it is a legitimate minimum technical requirement which has impact on costs. From that perspective, any mandatory retrospection without regard for minimum legitimate technical requirements, and without economic justification or exploration of alternatives appears inconsistent with Article 4.2c.

Sonya Twohig (ENTSO-E) notes that ENTSO-E will look at the legal concern and follow-up, but it should be noted that CBAs are national and will be conducted nationally on the TSO, DSO side etc. She agrees that this should be impact assessed.

The Chair concludes that this aspect should indeed be part of the assessment by NRAs.

6. Florence School of Regulation training activities on Network Codes

Leonardo Meeus (FSR) presents the upcoming training organized by the Florence School of Regulation from 25 September to 29 November 2018 (slides available [here](#)). The pilot training took place in October-November 2017. The 2018 training will include most of the topics that were covered in the 2017 training and an additional section on CNCs. Interested stakeholders are invited to contribute to the training and to sign up if they want to follow it later in 2018.

7. AOB – SOGL: list of items to improve

Eric Dekinderen presents VGB's questions where further clarification is needed on the correct interpretation of certain provisions and requirements in the NCs (slides available [here](#)).

Sonya notes ENTSO-E will take the questions and provide clarifications in conjunction with the CNC experts where relevant. NRAs and the EC input might be needed on some of the matters raised. It should be noted that on RfG, there needs to be consideration of a possible amendment process given the implementation is nearing completion, while on SOGL no such process is foreseen at this early stage of implementation.

The Chair notes that ACER and EC will assist in answering the questions.

Regarding the topic of communication lines, Eric Dekinderen (VGB) notes he was not present at the 3rd SO ESC meeting in December for the discussion on communication lines (for reference see minutes [here](#)), but underlines that TSOs should not trust the public internet at moments when the electricity grid is at risk. If there is a significant blackout in France, internet in Belgium would be down, as the hierarchy of internet servers in Europe requires it, and it would take 3 days before the internet is available again in Belgium. If one wants to use the public internet during restoration and defence, he warns against doing so.

8. Next meeting dates:

The proposed dates for the June meeting are approved: SO ESC on 12 June, ACER premises, and GC ESC on 11 June, ACER premises.

GC ESC	SO ESC	MESC
11 June, ACER	12 June, ACER	8 June, CEER, Brussels
14 September, ACER	13 September, ACER	4 th September, ENTSO-E, Brussels
13 December, ENTSO-E	14 December, ENTSO-E	5 th December, CEER, Brussels

9. Follow-up actions

1. ENTSO-E will inform the SO ESC when the minutes of the NC High-level Implementation Group meeting are published on the website.
2. ENTSO-E will look into how national implementation is followed upon in the framework of the CNCs and update the SO ESC at the next meeting on that.
3. ENTSO-E will consider the stakeholder request for providing a justification and cost-benefit analysis on the preferred options, and can provide additional specific analysis where deemed necessary and on an ad-hoc basis.
4. NRAs will update stakeholders on the process of the approval for KORRR and provide an update at the SO ESC in June.
5. ER LFDD and range of demand for disconnection: Regarding the question on technical differences on achieving parameters in ER (LFDD), ENTSO-E should provide an answer (*in relation to the choices across countries and what happens if anything occurs and the provision on disconnection is not respected*).
6. SOGL: communication line requirements for justification: ENTSO-E will look at the legal concern raised by the DSOs and will follow-up on that.
7. ENTSO-E and EC will contribute to answer the questions raised by VGB regarding interpretation of certain articles in the SO codes and Connection NCs.