



## Provisions in the Emergency & Restoration code that ask for our special attention

ESC SO  
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In the Emergency & Restoration network code, some provisions ask for **special attention** from us as stakeholders in ESC.

Those topics are related to :

- Timelines
- Financial issues
- Communication issues
- Market issues
- Miscellaneous

The E&R NC prescribes **in 12 (sub)articles** that documents have to be drafted before 18/12/2018.

VGB fears that this timeline is too strict and **probably will** endanger :

- The quality of the documents
- The transparency
- The involvement of **all relevant** stakeholders

How could this be **prevented**?

The financial provisions in this code are minimal.

Art. 39.3 specifies :

*The rules developed in accordance with paragraph 1 shall:*

*(a) ensure the financial neutrality of each TSO and and relevant third party ....*

What is the meaning of the wording “**financial neutrality**”

Is this also applicable on the **costs for restoration of the grid**?

If the TSO has not to bear those costs, **who has to bear them**?

ENTSO-E indicated orally on 7/3/2018 that the financial aspects have to be defined **at the level of each Member State**.

What will occur with the costs of **the inter-TSO assistance** (Art. 14)?

Isn't this an EU issue rather than a Member State issue?

**Communication is a key issue** in emergency & restoration situations

In several EU-countries, the TSO has its own communication network for voice and for IT.

Is it the intention to apply this principle in all countries of the EU meaning that the communication system is installed and maintained **by the TSO** including under conditions of black-out, emergency and restoration?

What with **the international communications** between exchanges? Markets cannot restart if international communications are not operational.

Communications with **most windfarms** are operational via the **classic internet**. Will internet be available during any restoration? Or are windfarms **out of scope** in case of the restoration process?

- VGB considers the absolute priority for market processes as non-realistic in emergency & restoration phases
- Art. 39.c (Settlement at market suspension) specifies :  
*The rules developed in accordance with paragraph 1 shall:  
... incentivise balance responsible parties to strive to be balanced **or** help the system to restore its balance*  
What is the intention of “to strive to be balanced”?  
Can a balance responsible party be balanced if data to define its position are not complete?  
In our opinion, **“Help the system to restore its balance”** is the only goal during restoration!

- Art. 12.3 and 24.3 specify that the units involved in Defence and Restoration plans will be identified on 18/12/2018.  
What happens with PGMs connected after 18/12/2018?
- Are “high priority significant grid users” (definition 3) a part of the SGUs defined according to Art. 2.1 or can each TSO qualify other consumers (e.g. radio / air traffic control) as such?  
Does ENTSOE intend to define criteria to specify “high priority significant grid users”? Examples would help.