All TSOs' proposal for the Key Organisational Requirements, Roles and Responsibilities (KORRR) relating to Data Exchange in accordance with Article 40(6) of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a Guideline on Electricity Transmission System Operation

Response to public consultation comments received during the consultation held 31 October – 1 December 2017

Remarks:

(i) identical comments from different stakeholders have been grouped where possible, to improve the readability;
(ii) the references to the articles and paragraphs are based on the version of KORRR that was submitted to public consultation (see the KORRR consultation at ENTSO-E consultation hub), the updated references in the final KORRR are included in the column for the response.

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
1	0	ENTSO-E should check the wording, some editorial mistakes.	Yes	**Accepted.** Some editorial mistakes have been detected and solved	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
1	3	Proposal: **3. When applying the KORRR, the TSOs shall:** **◦ d. respect the responsibility assigned to the relevant TSO in order to ensure system security, including as required by national legislation (2009/72/EC).** **NEW ◦ g. respect the responsibility assigned to DSOs (2009/72/EC).** Explanation: 3. It is necessary including the European Directive where responsabilities for TSOs and DSOs are defined: 2009/72/EC. (2009/72/EC-Art 25(1): The distribution system operator shall be responsible for ensuring the long-term ability of the system to meet reasonable demands for the distribution of electricity, for operating, maintaining and developing under economic conditions a secure, reliable and efficient electricity distribution system in its area with due regard for the environment and energy efficiency.)	No	**Not accepted**. Article 1(3) (d) of KORRR (article 1(5)(d) of the new KORRR version) is in line with Article 4(2) (e) of SO GL and responsibility of DSOs over their grid is considered in Article 1(3) (e) of KORRR (article 1(5)(e) of the new KORRR version) and Article 4(2) (f) of SO GL. As European Directive 2009/72 applies to KORRR there is no need to refer to it.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
1	3	Proposal: **After the article 1-3.c) - "TSOs shall specify a format to exchange data based on existing system as far as possible".** Explanation: Existing SGUs, DSOs or CDSOs have made significant investments to share data with TSOs and additional changes could lead to important costs. Therefore, in order to minimize the costs borne by these existing SGUs, EDF believes that the rules and requirements concerning data exchanged under the KORRR should be based on the principle of using to the best of their capabilities the existing systems and infrastructures already in place.	No	**Not accepted**. Format to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(3) of KORRR (article 1(5) of the new KORRR version) and be examined by the competent NRA.	EDF
1	3	Typographical error (additional word 'and ') in Article 1(3). Should read When applying the KORRR the TSOs shall:	Yes	**Accepted**. Article 1(3) of KORRR (article 1(5) of the new KORRR version) This article has been rewritten in line with Article 4(2) of SO GL solving also the typographical error detected.	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	1, 3, 4, 6, 7	1. For the purposes of the KORRR, terms used in this document shall have the meaning of the definitions included in Article 3 of the Regulation (EU) 2017/1485, Article 2 of Regulation (EU) 2015/1222, Article 2 of Regulation (EC) No 714/2009, Article 2 of Commission Regulation (EU) No 543/2013, Article 2 of Regulation (EC) No 631/2016, Article 2 of Regulation (EC) No 1388/2016, Article 2 of Regulation (EC) No 1447/2016 as well as Article 2 of Directive 2009/72/EC of the European Parliament and of the Council and the other items of legislation referenced therein. 2. No change 3. The KORRR shall be binding upon TSOs as referred to herein and their permitted successors and assigns and irrespective of any change in the TSO's names. 4. No change, but please check for editorial mistakes. 5. No change. 6. For the purpose of the KORRR, Real Time Data means a representation of the actual state of the facilities. 7. For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO or DSO when there is no other system operator between SGU and the receiving TSO or DSO. Explanation: The change in paragraph 3. is necessary to make the sentence comprehensible, as the original sentence contained unnecessary text remains from a former version. The change in paragraph 6. is necessary to avoid unnecessary and unjustified costs to stakeholders by obliging them to update data every minute even when data didn't change in between. The change in paragraph 7. is necessary to make the paragraph comprehensible.	1.Yes 2.No 3.Yes 4.Yes 5.No 6.Yes 7.Yes	1. **Accepted.** Article 2(1) has been amended. 2. **No action** 3. **Accepted**. Article 2(3) (article 2(2) of the new KORRR version) has been amended to make the sentence comprehensible. 4. **Article 2(4) has been deleted**. 5. **No action** 6. **Accepted**. Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute. 7. **Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
2	1	Clarification: 1. Definitions in NC and SO GL are not exactly the same. It could be useful including definitions in this Article to better undertand the document.	No	**Not accepted**. All definitions from Network Codes and European regulation apply and shall be used to understand KORRR. It is not possible to change a definition of a Directive in a lower level regulation.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
2	2	Explanation: 2. This statement is unclear. It should be rewritten.	Yes	**Accepted**. Article 2 (2) (article 2(3) of the new KORRR version) has been amended. Additionally, to clarify the meaning of the statement: 1. Index and names of Articles are used for clarity and does not affect the interpretation	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				of KORRR. The relevant parts of the KORRR are the wording of the articles. 2. All in force directives, and their possible changes, apply to KORRR.	
2	3	Article 2(3) From the wording of this clause it is (to me at least) who the KORRR is binding upon? Reword to aid clarity.	Yes	**Accepted**. Article 2 (3) (article 2(2) of the new KORRR version) This article has been amended to make the sentence comprehensible.	SP Energy Networks
2	4	Proposal: **4. For the purpose of the KORRR, and aggregation means a set of power-generating modules, demand facilities and/or closed distribution systems which can operate as a single facility or closed distribution system for the purposes of offering one or more balancing or ancilliary service.** Explanation: 4. Power-generating module is the term used in the RfG and the GL OS. Aditionally, aggregators may provide other services besides congestion management, whith this regard article 108 of the GL SO refers to ancilliary services.	Yes	**Article 2(4) has been deleted** Additionally, as Articles 2(4) has been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
2	4	Proposal: **Art 2-4 - Delete** Explanation: The aim of this document is to make a proposal for the key organizational requirements, roles and responsibilities. EDF considers that the introduction of definitions is not in the scope of the KORRR.	Yes	**Accepted. Article 2(4) has been deleted** Additionally, as Articles 2(4) has been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	EDF
2	4	Article 2(4) requires a clarification (the SO-GL delegates the responsibility for data to the owner of the unit) Proposal: **A set of power units that is aggregated for the purpose of direct marketing is not an aggregation for the purpose of the KORR.**	Yes	**Article 2(4) has been deleted** Additionally, as Articles 2(4) has been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level	EnBW Energie Baden-Württemberg AG BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	4, 6	The text is in (4) unclear/garbled. Suggest change (4) to: **For the purpose of the KORRR, and aggregation means a set that can include any of power generation unites, demand facilities, and closed distribution systems which can operate as a single facility or closed distribution system for the purposes of offering one or more balancing or congestion management service** **Art 2(6)** **Defining real time as <1minute is not in the scope of organizational requirement, roles or responsibility. It is a feature of the data that is in the scope of SOGL Art 40(5) and 40(7)- not KORRR**	1 Yes 2. Yes	1. **Article 2(4) has been deleted** Additionally, as Articles 2(4) has been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level 2. **Accepted**. Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	Energy Networks Association
2	4	**For the purpose of the KORRR, aggregation means a set of power generation units, demand facilities, closed distribution systems which operate as a single facility or closed distribution system for the purposes of offering for example one or more balancing or congestion management services** Art2 4° states: "For the purpose of the KORRR, aggregation means a set of power generation units, demand facilities, closed distribution systems which can operate as a single facility or closed distribution system for the purposes of offering one or more balancing or congestion management services" [with correction of spelling mistakes]. This is a copy of the definition in SOGL, but creates its own problems as 1. aggregation can also be used outside for balancing or congestion management (e.g. in the energy markets themselves) and 2. this would imply that any company with multiple sites and/or power generation units is to be considered an aggregator here(as it says "can operate" and not "operates"). It would even in extremis mean that any individual (residential) grid user with two "demand facilities" (e.g. when you have a second residence) would be an aggregator as he "can operate" (but probably won't) these installations as a single facility. Last, facilities can be part of portfolios of different aggregators depending on the service that is being offered (e.g. participating with one part of a site with one aggregator in one service and with another part of a site with another aggregator to a second service and directly to a third service). It would moreover also be interesting to ad a clear definition of "facility" insofar KORRR is concerned, as the general use of the word is not very clear (RfG nor DCC define "facility" not its	Yes	**Article 2(4) has been deleted** Additionally, as Articles 2(4) has been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		own)			
2	5	Proposal: **5. For the purpose of the KORRR, a modification is considered significant when it is significant in EU 2016/631 (NC RfG), EU 2016/1388 (NC DCC) or EU 2016/1447 (NC HVDC). In this context, it must be considered specificities made byt each Member State in their own implementation process.** Explanation: 5. To be a modification considered as significant, it also requires the specifications (in the implementarion process) passed in each country. The NCs per se are not enough.	Yes	**Accepted**. Article 2(5) (article 2(4) of the new KORRR version) has been amended to clarify it and to take into account national implementation.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	6	Proposal: **For the purpose of the KORRR, Real Time Data means a representation of the actual state of the facilities no more than one minute old. The communication of real-time-data is at least necessary if the state of the facility changes.** Explanation: The definition of real-time data says that the data should not be older than one minute. This causes much efforts and massive data volume that is not necessary to ensure system operation. Instead it is sufficient to provide data if the state of the facility changes.	Yes	**Partially accepted.** Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	TIWAG-Tiroler Wasserkraft AG - Dispatching
2	6	Proposal: **Art.2-6 - "For the purpose of the KORRR, Real Time Data means a representation of the actual state of facilities"** Explanation: The §6 states that “real time data means a representation of the actual state of facilities no more than one minute”. EDF believes that these KORRR should be less prescriptive and not set out a time frame of one minute. EDF first wonders what the rationale for setting the maximum admissible granularity of one minute is and then whether, providing data older than one minute could be acceptable and relevant. In some cases, it could be more efficient to send the data only when the value has been updated or changed, especially to optimize the total volume of data received and computed by TSO, as it has an impact on the cost of the infrastructures. Therefore, the appropriate level of granularity should definitely be discussed during the national consultation.	Yes	**Partially accepted.** Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	EDF
2	6	The article 2 (6) requires a change Proposal (from line 205): **For the purpose of the KORRR, Real Time Data means a representation of the actual state of the facilities no more than one minute old. The communication of real-time-data is at least necessary if the state of the facilitiy changes.** **The definition of real-time data says that the data should not be older than one minute. This causes much efforts and massive data volume that is not necessary to ensure a secure sys-tem operation. Instead it is sufficient to provide data if the state of the facilitiy changes.**	Yes	**Partially accepted.** Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	EnBW Energie Baden-Württemberg AG BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	6	Article 2(6) - Do not believe that the KORRR which is to do with requirements, roles, responsibilities has the mandate to state what real time data means. This should be within Regulation 2017/1485 Article 40.	Yes	**Partially accepted.** Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	SP Energy Networks
2	6	**6. For the purpose of the KORRR, Real Time Data means a representation of the actual state of the facilities as agreed between the relevant TSO, DSOs and SGUs.**	Yes	**Partially accepted.** Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
2	7	Clarification: It should be clarified that the data from SGUs should not be provided twice. The multiple provisions of data cause costs and inefficiency. Instead the distribution and transmission system operators shall exchange the data among each other.	Yes	**Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System.	TIWAG-Tiroler Wasserkraft AG - Dispatching

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	7	"7. For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO or DSO when they are the first TSO or DSO that receives that data from the SGU." should be changed either to **"For the purpose of the KORRR, SGUs are considered to provide data directly and only to the TSO or DSO they are directly connected to."** or even better to: **"For the purpose of the KORRR, SGUs are considered to provide data directly and only to the TSO in whose Observation area they are when it is the first TSO that receives that data from the SGU. TSOs forward respectively exchange data with other TSOs or DSOs if necessary."** SGUs only should have one Point of contact for data delivery in order to avoid unessential efforts and costs. **7. For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO or ITS CONNECTING DSO ACCORDING TO ARTICLE 3(4), when they are the first TSO or DSO that receives that data from the SGU.** Article 2 (7) should be referenced to article 3 (4) from KORRR and clarify that the data should be provided based on an agreement between the DSO and the TSO.	Yes	**Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System.	RWE Generation SE Stromnetz Hamburg GmbH
2	7	Clarification of article 2 (7) Article 2(7) is unclear. It should be clarified that the data from SGUs should not be provided twice. The multiple provisions of data cause costs and inefficiency. Instead the distribution and transmission system operators shall exchange the data among each other. As much of the data is already being sent to the TSO, SGUs should be able to use this also for potential additional data.	Yes	**Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System.	EnBW Energie Baden-Württemberg AG BDEW- German Association of Energy and Water Industries
2	7	7. For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO or DSO when there is no other system operator between SGU and the receiving TSO or DSO.	Yes	**Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	7	For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO and to the DSO when they are the first TSO or DSO that receives that data from the SGU. Explanation: The proposed provision from Article 2 (7) of the KORRR document is incompatible with the provisions of Articles 48, 49 and 50 of Commission Regulation (EU) 2017/1485 (SO GL) which call for the data transmission to OSD and TSO.	Yes	**Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System.	PTPiREE
2	8	Modification proposal #1: **Art. 2.8 (new): "For the purpose of the KORRR, Member States should be free to consider possible modifications in the definitions of SGU based on the particular National circumstances."** Justification: Art. 2 of the KORRR provides the relevant definitions for the KORRR, which are referenced to definitions set out in other Network Codes; in particular, SGU's definition is indirectly but inextricably linked to the definitions provided in the System Operation Guidelines and Network Code Requirements for Generators. In particular, on one hand art. 2 of the former set out that a SGU is a power generating module classified as B, C or D. On the other hand art. 5 of the latter foresees that the minimum threshold from which a SGU can be considered significant is by default 1 MW, while leaving room to Member States to reduce this threshold based on a consultation carried out by the TSO. We believe that such provision, which correctly captures the principle that each Member State can modify definitions to be applicable to grid connections where efficient, cannot be transposed as is to other operational network codes, since it is not granted that the same definitions would be the most efficient for purposes other than network connection. We believe that in the case of the KORRR and the system operation guideline, the idea to ensure exchange of data on all SGUs that follow a certain framework for the connection to the grid is potentially inefficient for the system as a whole as it would lead to the obligation to exchange a lot of information on generation units even if they won't participate to the operation of the system. Therefore we believe that the KORRR should leave it open to every Member State the possibility to introduce different definitions of SGU based on the particular National circumstances.	No	**Not accepted.** All definitions from Network Codes and European regulation apply and shall be used to understand KORRR. The definition of SGU is stated in article 2 of SO GL and they are classified in accordance with the criteria set in Article 5 of Commission Regulation (EU) 2016/631 (Network Code Requirements for Generators) It is not possible to change a definition of a Directive in a lower level regulation.	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
2	1, 3, 4, 6, 7	**"1. For the purposes of the KORRR, terms used in this document shall have the meaning of the definitions included in Article 3 of the Regulation (EU) 2017/1485, Article 2 of Regulation (EU) 2015/1222, Article 2 of Regulation (EC) No 714/2009, Article 2 of Commission Regulation (EU) No 543/2013, Article 2 of Regulation (EC) No 631/2016, Article 2 of Regulation (EC) No 1388/2016, Article 2 of Regulation (EC) No 1447/2016 as well as Article 2 of Directive 2009/72/EC of the European Parliament and of the Council and the other items of legislation referenced therein.** **2. No change** **3. The KORRR shall be binding upon TSOs as referred to herein and their permitted successors and assigns and irrespective of any change in the TSO's names.** **4. No change, but check editorial mistakes.** **5. No change.** **6. For the purpose of the KORRR, Real Time Data means a representation of the actual state of the facilities as agreed between the relevant TSO, DSOs and SGUs.** **7. For the purpose of the KORRR, SGUs are considered to provide data directly to the TSO or DSO when there is no other system operator between SGU and the receiving TSO or DSO.** The change in paragraph 3. is necessary to make the sentence comprehensible, as the original sentence contained unnecessary text remains from a former version. The change in paragraph 6. is necessary to avoid unnecessary and unjustified costs to stakeholders by obliging them to update data every minute even when data didn't change in between, and irrespective of actual TSO needs. The change in paragraph 7. is necessary to make the paragraph comprehensible."	1.Yes 2.No 3.Yes 4.Yes 5.No 6.Yes 7.Yes	1. **Accepted.** Article 2(1) has been amended. 2. **No action** 3. **Accepted**. Article 2(3) (article 2(2) of the new KORRR version) has been amended to make the sentence comprehensible. 4. **Article 2(4) has been deleted**. 5. **No action** 6. **Accepted**. Article 2(6) (article 2(5) of the new KORRR version) has been amended to clarify real time data definition and to remove the reference to 1 minute. 7. **Article 2(7) has been deleted**. Additionally, as Articles 2(4) and 2(7) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
2	New	Proposal: **New paragraph - "The rules and requirements set out in these KORRR shall apply to the parties mentioned in the article 2 of the SO GL Regulation".** Explanation: There is no definition of SGU, DSO or CDSO in article 3 of Regulation EU 2017/1485. It is needed to clarify that the rules and requirements set out in these KORRR shall apply to the parties mentioned in article 2 of Regulation EU 2017/1485.	No	**Not accepted**. Article 2(1) of the SO GL already defines the scope of the regulation and the SGUs it applies to. The KORRR is drafted as a development of the SO GL so it applies to the same SGUs. It can be further reviewed at national level according to Article 40(5) of SO GL.	EDF

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3	1	**Proposal:** **1a. CDSOs shall be considered as DSOs for the purposes of the KORRR. Therefore, transmission connected CDSOs and TSOs shall agree on data exchanges between them according art. 40(7) of Regulation 2017/1485.** Explanation: 1a. CDSOs shall have the same roles, requirements and responsibilities that DSOs with regard to data exchange.	Yes	**Accepted**. A new article 1(4) has been added to the new KORRR version to reflect closed distribution system roles that shall apply in the KORRR.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
3	1, 2, 3, 4, 5, 6,7, 8	**"New 1. This methodology sets out the key organisational requirements, roles and responsibilities in relation to data exchange with TSOs. Each TSO shall have the right but not the obligation to obtain or receive the data set out in Title II of Regulation (EU) 2017/1485 from the owner of the relevant network element or the party responsible for providing the information, as the case may be, provided that all of the following conditions are met:** **a. the TSO requires the data in order to carry out the operational security analysis in accordance with Article 72 of Regulation (EU) 2017/1485; the set of required data shall be the minimum set that enables the TSO to do so;** **b. the data are not already available to the TSO:** **i. either pursuant GLDPM and CGMM;** **ii. pursuant national legislation or regulation, contractual basis or based upon any other kind of legally binding mechanism;** **iii. or if the data is publicly available.** **c. the data are not already available to the respective DSO. In such a case, the data shall be exchanged directly between the TSO and the DSO.** **New 2. This KORRR does not confer TSOs the right to request data not explicitly described in Title 2 of Regulation (EU) 2017/1485. For avoidance of doubt, data regarding grid elements outside the observability area of the respective TSO are out of scope.** **New 3. The harmonisation intention of Article 40(6) of Regulation (EU) 2017/1485 shall be understood to refer to the harmonisation of key organisational requirements, roles and responsibilities in relation to data exchange. TSOs shall not invoke the harmonisation requirement in order to obtain data which they do not require for their legal tasks assigned by Regulation (EU) 2017/1485.** **"** **"1. Each TSO, DSO, CDSO or SGU shall be responsible for the quality of the information they provide regarding their facilities or services. Except where**	New 1.No New 2. No New 3. No 1. Yes 2. Yes 3. Yes 4.Yes 5. No 6. Yes 7. Yes 8. Yes	**New 1 and 3. Not accepted.** SO GL in its title 2 establishes the mandatory data exchange for TSOs, DSO and SGUs without conditions. KORRR requirements are aligned with the data defined in Title 2 of Regulation (EU) 2017/1485 that represent the maximum set of information that TSOs can request. During SOGL implementation at national level, article 40(5) allows to each TSO, in coordination with DSOs and SGUs and subject to NRAs approval, to establish the scope and applicability of data exchange. It means that TSOs can stablish which information under Title 2 is necessary to carry out TSO´s responsibilities defined in the regulation and also TSOs can indicate for which means the exchange data must be used. Once this is defined and approved by NRAs, is applicability is mandatory. **New 2. Not accepted.** Although, SO GL does not allow TSOs to request without agreement information under title 2 it doesn´t forbid to manage agreements to exchange them. Additionally, not all the data out of the observability area is out of scope, for example there can be SGUs connected out of observability area that have to exchange data with the TSO.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		explicitly otherwise stated, they shall be the party required to provide the data. 2. Delete paragraph. 3. Delete paragraph. 4. Distribution connected SGUs shall provide the structural, scheduled and real time data directly to the DSO they are connected to. However, exceptionally, each TSO, in agreement with the DSOs in its Control Area, may define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO or to the DSO they are connected to. When the data is directly provided to the TSO, the TSO shall provide it to the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO. 5. No change. 6. CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to. 7. DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems, excluding the communication channel, to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. 8. Delete the last part of the paragraph: ""The delegating entity shall remain responsible for ensuring compliance with the obligations under Regulation 2017/1485, including ensuring access to information necessary for monitoring by the regulatory authority."" " Explanation: "The additional first three paragraphs are necessary to make sure fundamental principles of European Union law are respected, this is: the principle of proportionality (Article 5(4) of the Treaty on European Union), the principle of subsidiarity (Article 5(3) of the Treaty on European Union) and the principle of data scarcity (e.g. laid down in article 6(1) of (EU) 2016/679). The change in paragraph 1. is necessary to adapt the wording to a form suitable to legal documents. Paragraph 2. and 3. should be deleted, as they refer solely to parties offering services to TSOs. From our point of view, services provided to TSOs and any obligation stemming from that should not be defined in KORRR, but can be bilaterally agreed when procuring such services.		1. **Partly accepted.** Article 3(1) has been amended to reflect "shall wording". It is considered that in the first part of the actual article, the proposal "Except where explicitly otherwise stated, they shall be the party required to provide the data" it is included. 2. **Accepted**. **Article 3(2) has been deleted** 3. **Accepted. Article 3(3) has been deleted** 4. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) is included to highlight the NRA approval. 5. **No action** 6. **Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to. 7. **Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO. 8. **Not accepted**. However, article 3(8) (article 3(9) of the new KORRR version) has been amended to clarify it. Additionally, as Articles 3(2) and 3(3) have	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Paragraph 4 should define cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the TSO-DSO data management report (page 16 of the report:""Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]"" Paragraph 4. sentence 1 should be changed from ""coordination"" to ""agreement"", as agreement is required by article 40(7) of (EC) 2017/1485 for all data exchanges related to distribution systems. Sentence 2 should be deleted as it creates inefficiencies and legal and economic uncertainties and risks if multiple decisions on data exchange are possible for each and every SGU. In sentence 3, ""make it available"" must be changed into ""provide it"", as TSOs are obliged to provide it to the DSO to fulfill their obligations from 72/EC/2009, art. 12 e):""Each transmission system operator shall be responsible for:(e)providing to the operator of any other system with which its system is interconnected sufficient information to ensure the secure and efficient operation, coordinated development and interoperability of the interconnected system;"" Data related to SGUs at the distribution system is unquestionably necessary to ensure the secure and efficient operation of the (distribution) system. The last sentence of paragraph 4 should be deleted, as it is unclear how quality and/or granularity of data could be improved by the receiving party. Furthermore, when assuming cascaded data exchange, the highest efficiency lever is untapped by data aggregation and thus refinement. Such solutions are prohibited by the requirement contained in the last sentence without any necessity nor justification. " "Paragraph 6 should explicitly prohibit duplicated data transfer, as it is inefficient and constitutes unnecessary costs to stakeholders. In paragraph 7 it cannot be the sole responsibility of the DSOs, CDSOs and SGUs for the installation, configuration, security and maintenance of the communication channels. The TSO has an equal responsibility. Paragraph 8: It should be possible to transfer to all responsibilities."		been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national. Related TSO-DSO data management report a clarification should be done. KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	
3	1	Art 3 1° A definition of "facilities" will be needed, as RfG and DCC have a different scope (machine-level versus site-level), in order to avoid double counting (e.g. a PGM on a site sending information directly under RfG but also aggregated on site level under DCC).	Yes	**Accepted**. Article 3(1) has been amended.	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	2	Proposal: Art.3-2- "In the case of an aggregator, the aggregation of the facilities shall be considered as the SGU and the aggregator responsible for the data provision. In some cases, an individual power generating module or demand facility included in the aggregation may also be an SGU. In this case, obligations to provide data under Regulation 2017/1485 is the responsibility of aggregator or SGU". Explanation: EDF understands that an aggregator and a SGU could provide the same data to TSO or DSO. EDF believes the redundancy is inefficient and should be avoided. Therefore, the data should be provided either by the SGU or by the aggregator.	Yes	Article 3(2) has been deleted. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	EDF
3	2, 4, 5, 7	Art 3(2) It is not clear exactly what is meant by "considered as the SGU" Suggest: n the case of an aggregator, the aggregation of the facilities shall be considered as theto be a SGU and the aggregator shall be responsible for the SGU's data provision. In some cases an individual power generating module or demand facility included in the aggregation may also be an SGU and may still have obligations to provide data under Regulation 2017/1485 independently of the aggregator Also Art 3(2) This should be developed by each TSO as part of A40(5) and not imposed by KORRR Art 3(4) This should be developed by each TSO as part of A40(5) and not imposed by KORRR Art 3(5) There do not seem to be any quality requirements in the KORRR – nor should there be. Art 3(7) What is the object of this sentence? Is it the data or the communication system	1.Yes 2.No 3.Yes 4.Yes	1. Article 3(2) has been deleted. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level. 2. Not accepted. Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval. 3. Not accepted. However, article 3(5) of KORRR (article 3(4) of the new KORRR version) has been amended to clarify it 4 Not accepted. However, article 3(7) of KORRR has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO, and SGUs for the communication systems until the communication interface point with the TSO.	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		"according to KORR"?			
3	2	Art3 2° "in the case of an aggregator, the aggregation ...": Two questions arise, more precisely an aggregator of what (not specified) and of course the above-mentioned issue with the definition of aggregation (art2 4°). This is specifically important as "the aggregation shall be considered as the SGU", which means this aggregation will have a number of responsibilities and tasks, although this can change fast/frequently and a single facility might even be part of different aggregation portfolios, which then raises the question who will be responsible for communicating the information, to avoid double (or more) counting.	Yes	**Article 3(2) has been deleted**. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	IFIEC Europe
3	2,3	**Delete paragraph.** Paragraph 2. and 3. should be deleted, as they refer solely to parties offering services to TSOs. From our point of view, services provided to TSOs and any obligation stemming from that should not be defined in KORRR, but can be bilaterally agreed when procuring such services.	1. Yes 2. Yes	**Accepted. Article 3(2) and article 3(3) have been deleted**. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	3	**Proposal:** **3. Transmission connected SGUs shall provide data directly to the TSO.** Explanation: 3. In order to avoid duplicity in data exchanges, direct provision of data (to the TSO) from SGUs connected to the distribution network shall be restricted to data not submitted to the DSO (as stated in this same article -point 6-). Therefore it shall be removed or reworded the following sentence "and SGUs provinding services directly to the TSO".	Yes	**Article 3(3) has been deleted**. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national level. .	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	New	Change: Article 3 should provide general principles with regard to data ex-change **Proposal for amendment of Article 3 (new text from line 213):** **1. This methodology sets out the key organizational requirements, roles and responsibili-ties in relation to data exchange with TSOs. Each TSO shall have the right but not the obligation to obtain or receive the data set out in Title II of Regulation (EU) 2017/1485 from the owner of the corresponding network element or the party responsible for pro-viding the information, as the case may be, provided that all of the following conditions are met:** **a) the TSO requires the data in order to carry out the operational security analysis in accordance with Article 72 of Regulation (EU) 2017/1485; the set of required data shall be the minimum set that enables the TSO to do so;** **b) the data are not already available to the TSO:** **i. either pursuant GLDPM and CGMM;** **ii. pursuant national legislation or regulation, contractual basis or based upon any other kind of legally binding mechanism;** **iii. or if the data is publicly available;** **c) the data are not already available to the respective DSO. In such a case, the data shall be exchanged directly between the TSO and the DSO.** **2. This methodology does not confer TSOs the right to request data not explicitly de-scribed in Title 2 of Regulation (EU) 2017/1485. For avoidance of doubt, data regarding grid elements outside the observability area of the respective TSO are out of scope.** **3. The harmonization requirement set out in Article 40(6) of Regulation (EU) 2017/1485 shall be understood to refer to the harmonization of key organizational requirements, roles and responsibilities in relation to data exchange. TSOs shall not invoke the har-monization requirement in order to obtain data which they do not require for their legal tasks assigned by Regulation (EU) 2017/1485.** Article 40 (7) of the regulation 2017/1485 says: “18 months after entry into force of this Regulation, each TSO shall agree with the relevant DSOs on effective, efficient and proportional processes for providing and managing data exchanges between them, including, where required for efficient net-work operation, the provision of data related to distribution systems and SGUs. Without prejudice to the provisions of paragraph 6(g), each TSO shall agree with	New1. No New2. No New3. No	**New 1 and 3. Not accepted.** SO GL in its title 2 establishes the mandatory data exchange for TSOs, DSO and SGUs without conditions. KORRR requirements are aligned with the data defined in Title 2 of Regulation (EU) 2017/1485 that represent the maximum set of information that TSOs can request. During SOGL implementation at national level, article 40(5) allows to each TSO, in coordination with DSOs and SGUs and subject to NRAs approval, to establish the scope and applicability of data exchange. It means that TSO can stablish which information under Title 2 is necessary to carry out TSO´s responsibilities defined in the regulation and also TSOs can indicate for which means the exchange data must be used. Once this is defined and approved by NRAs, is applicability is mandatory. **New 2. Not accepted.** Although, SO GL does not allow TSOs to request without agreement information under title 2 it doesn´t forbid to manage agreements to exchange them. Additionally’ not all the data out of the observability area is out of scope, for example there can be SGUs connected out of observability area that have to exchange data with the TSO.	BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		the relevant DSOs on the format for the data exchange." Regulation (EU) 2017/1485 clearly defines how the DSO and the TSO work together. As the minor document to Regulation (EU) 2017/1485 the KORRR proposal should not differ from it. In order to avoid inefficiency, the data provided by the SGU is either send to the DSO or the TSO. The distribution and transmission system operators shall exchange the data among each other, so that the SGU can provide the data to one single point of contact. The last sentence of Article 3 (4) causes misunderstandings as well. The highest efficiency level of cascaded data exchange is untapped by data aggregation. Such solutions are prohib-ited by this requirement without any needs or reasons.			
3	New	**New 3. The harmonisation intention of Article 40(6) of Regulation (EU) 2017/1485 shall be understood to refer to the harmonisation of key organisational requirements, roles and responsibilities in relation to data exchange. TSOs shall not invoke the harmonisation requirement in order to obtain data which they do not require for their legal tasks assigned by Regulation (EU) 2017/1485.**	No	**New 3. Not accepted.** SO GL in its title 2 establishes the mandatory data exchange for TSOs, DSO and SGUs without conditions. KORRR requirements are aligned with the data defined in Title 2 of Regulation (EU) 2017/1485 that represent the maximum set of information that TSOs can request. During SOGL implementation at national level, article 40(5) allows to each TSO, in coordination with DSOs and SGUs and subject to NRAs approval, to establish the scope and applicability of data exchange. It means that TSO can stablish which information under Title 2 is necessary to carry out TSO´s responsibilities defined in the regulation and also TSOs can indicate for which means the exchange data must be used. Once this is defined and approved by NRAs, is applicability is mandatory.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	3	**Modification proposal**: Transmission connected SGUs shall provide data directly to the TSO. Justification: The sentence is contradicting the no-one-size-fits-all principle laid down in art. 3.4, as it already imposes that SGUs connected to DSOs will have to provide information directly to TSOs.	Yes	**Article 3(3) has been deleted**. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				aggregations purpose is to offer service to the System, they shall be defined at national level.	
3	4	Proposal: 4. Distribution connected SGUs shall provide the structural, scheduled and real time data directly to the DSO they are connected to. However, exceptionally, each TSO, in agreement with the DSOs in its Control Area, may define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO and/or to the DSO they are connected to. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall provide this information to the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO. The quality, granularity and refresment rate of the data shall be maintained or improved. Explanation: 4.It should be defined the cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the TSO-DSO data management report (page 16 of the report:"Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]". Additionally, Art 40(10) of the GL SO establishes that "DSOs with a connection point to a transmission system shall be entitled to RECEIVE the relevant structural, scheduled and real-time information from the relevant TSOs (...)". This article sets the general rule. Art 51 of the GL SO only concerns power-generating modules (not SGUs in general). Additionally, provision of data between TSOs and DSOs shall also mantain the refreshment rate, especially in the provision of Real-Time data.	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval. Related TSO-DSO data management report a clarification should be done. KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	4	The article 3 (4) requires some changes. Proposal (from line 222): SGUs provide the structural, scheduled and real time data directly to the TSO or to the DSO they are connected. The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall provide it to the DSO to fulfill its obligation from 72/EC/2009, art. 12 . When the data is provided to the DSO, the DSO shall provide the data to the TSO.	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	EnBW Energie Baden-Württemberg AG
3	4	Changes of Article 3 (4) Proposal (from line 222): Each TSO, in agreement with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO and/or to the DSO they are connected. The decision for each type of information and type of SGU may be inde-pendent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall provide it to the DSO to fulfil its obligation from 72/EC/2009, Art. 12 . When the data is provided to the DSO, the DSO shall provide the data to the TSO.	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	BDEW- German Association of Energy and Water Industries
3	4	4. Distribution connected SGUs shall provide the structural, scheduled and real time data directly to the DSO they are connected to. However, exceptionally, each TSO, in agreement with the DSOs in its Control Area, may define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO or to the DSO they are connected to. When the data is directly provided to the TSO, the TSO shall provide it to the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO.	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	4	**Modification proposal**: "each TSO, **in agreement** with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real-time data directly to the TSO or to the DSO they are connected". Where TSOs have direct access to scheduled and real-time data from SGUs, TSOs should timely share such data with DSOs, and viceversa. Justification: We believe that, in order to maximize system efficiency and avoid overlaps or	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		coordination failures among TSO and DSOs, each information should be sent only once by SGUs. Therefore, we believe that art. 3.4. of the KORRR should be amended in a way that ensures that information is exchanged only once, i.e. removing the word "and". This would allow each TSO to define in agreement with the DSOs (and not just in coordination, please refer to our general comment section) the model for data exchange. At the same time, it is of utmost importance that in both cases (SGU communicating data to the DSO or directly to TSO), the other party (TSO or DSO respectively) is reciprocally informed. In fact, as argued in the general comment section, it is extremely important to ensure that all parties are well aware of structural, scheduled and operational data, in order to guarantee an efficient network planning as well as system security and quality of service.			
3	4	Art3 4° "Each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs ...": Does this only involve those distribution connected demand facilities that deliver Demand Side Response services to system operators, as all other distribution connected demand facilities are not to be considered SGUs.	No	**Not accepted.** The KORRR shall apply to SGUs as referred to in rticle 2(1) SO GL	IFIEC Europe
3	4	The actual version of the KORRR sets the framework for data exchange models that are unilaterally decided by the TSO. This does not guarantee that those models are the overall most efficient ones. For example: • According to Art 3.4, the TSO is the party who defines how data from distribution-connected SGU are exchanged (either SGUàDSOàTSO or SGUàTSO(àDSO). Even though coordination with DSOs is mentioned, this article leaves the final decision power at the TSO and does not seek an agreement with the DSO on how to organize this in the most efficient way.	Yes	**Not accepted.** KORRR does not impose neither the DSOs nor the SGUs the use of a specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data to prepare that model. Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	Belgian DSOs: Eandis, Infrax, Sibelga, ORES, Resa

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	4	Each TSO, in agreement with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO and/or to the DSO they are connected. The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO. The quality and granularity of the data shall be maintained or improved. Explanation: The proposed solution give bigger probability that the developed solution will take into account the position of the DSO	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval.	PTPiREE
3	5	Article 3(5) - KORRR doesn't seem to specific quality requirements - and I would not it expect it to do so. REMOVE REFERENCE	Yes	**Not accepted.** Requirements are not specified in the KORRR, the methodology just reflects who has to define them. However, article 3(5) of KORRR (article 3(4) of the new KORRR version) has been amended to clarify it.	SP Energy Networks
3	6	Proposal (from line 232): CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to. Explanation: For the SGUs every data provision cases costs and bureaucracy. Thus, the SGU shall provide the data only once. The distribution and transmission system operators shall exchange the data among each other, so that the SGU can provide the data to one single point of contact.	Yes	**Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.	TIWAG-Tiroler Wasserkraft AG - Dispatching
3	6	Proposal: Art.3-6 – “CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to” . Explanation: EDF believes it is not efficient – burdensome and costly - to provide twice the same data.	Yes	**Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	6	The article 3 (6) requires a change. Proposal (from line 232) As far as reasonably possible CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to. For the SGUs every data provision cases costs and bureaucracy. Thus, the SGU shall provide the data only once. The distribution and transmission system operators shall exchange the data among each other, so that the SGU can provide the data to one single point of contact. To ensure the least possible number of points of contact, SGUs provide the data only to the TSO.	Yes	**Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.	EnBW Energie Baden-Württemberg AG
3	6	Change of Article 3 (6) Proposal (from line 232) CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to. For the SGUs every data provision cases costs and bureaucracy. Thus, the SGU shall provide the data only once. The distribution and transmission system operators shall exchange the data among each other to ensure the least possible number of contact points.	Yes	**Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.	BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	6	6. CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to.	Yes	**Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as the default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	7	Proposal: DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, secu-rity and maintenance of the communication systems to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. The re-sponsibility has nothing to do with the costs. Explanation: Article 3 (7) defines the responsibility for the installation, configuration, security and mainte-nance of the communication systems. At the workshop in Brussels on the 14th of November ENTSO-E confirms that the responsibilities have nothing to do with the costs. The assignment of any costs is not covered by the regulation 2017/1485. In addition the SO-GL does not state that the data have to be provides to the control center of the TSO. In every case it is a two-way-communication. It is not a proper solution that one party has to cover the whole respon-sibility and probably all the costs. In order to avoid misunderstandings this should be taken into account for the KORRR proposal.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO, CDSOs and SGUs for the communication systems until the communication interface point with the TSO.	TIWAG-Tiroler Wasserkraft AG - Dispatching

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	7	Proposal: 7. SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems to exchange data with the TSO and the DSO according to the KORRR unless explicitly otherwise agreed with the party that receives the data (TSO or DSO). Explanation: 7. This point should be reworded affecting only to SGUs because of the following reasons: - Data exchanges between TSOs and DSOs shall be agreed according to art. 40(7) of the GL SO. - CDSOs should be considered as DSOs within the KORRR; therefore, data exchanges with CDSOs connected to the transmision network should be agreed with the TSO. - Communication systems to exchange data with system operators (TSOs and DSOs) must be treated equally.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO. Related to CDSOs comment, a new article 1(4) has been added to the new KORRR version to reflect closed distribution system roles that shall apply in the KORRR.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
3	7	Proposal: Art.3-7 – "DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the equipment necessary to provide data to the TSO according to the KORRR up to the connection point or telecommunication terminal of TSOs or DSOs unless explicitly otherwise agreed with the TSO or DSO". Explanation: EDF considers that DSOs, CDSOs and SGUs are responsible for installation, configuration, security and maintenance of their own exchange data equipment up to the connection point with the transportation or distribution system, or up to TSOs' or DSOs' telecommunication terminals. Modem and telecommunication links are the properties of TSOs or DSOs. DSOs, CDSOs and SGUs cannot be held responsible for the damages or outages on this telecommunication network.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	EDF
3	7	The article 3 (7) requires a change. Proposal (from line 234): DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, secu-rity and maintenance of the communication systems to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. ´ (The responsibility has nothing to do with the costs.)	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO, CDSOs and SGUs for the communication systems until the communication interface point with the TSO.	EnBW Energie Baden-Württemberg AG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	7	Change of Article 3 (7) Proposal (from line 234): DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. The responsibility has nothing to do with the costs. Article 3 (7) defines the responsibility for the installation, configuration, security and mainte-nance of the communication systems. At the workshop in Brussels on the 14th of November ENTSO-E confirmed that the responsibilities have nothing to do with the costs. The assignment of any costs is not covered by the regulation 2017/1485. In addition the SO-GL does not state that the data have to be provided to the control center of the TSO. In every case it is a two-way-communication. It is not a proper solution that one party has to cover the whole responsibility and probably all the costs. In order to avoid misunderstandings this should be taken into account for the KORRR proposal.	Yes	Not accepted. However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	BDEW- German Association of Energy and Water Industries
3	7	Article 3(7) - Are TSOs abdicating any responsibility for any communication systems and requesting other parties to look after their communications systems . Needs further clarification to what 'systems' this is applying to.	Yes	Not accepted. However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	7	7. DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems, excluding the communication channel, to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	7	**Modification proposal**: Art. 3.7: "SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems **of their unit, up to the network connection point**, to exchange data with the TSO or DSO according to the KORRR unless explicitly otherwise agreed with the TSO or DSO." Justification: It has to be clarified that SGU have to install and operate not the entire communication system, but only up to the interface with connection point, in order to communicate with network communication systems.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	Enel
3	7	Art3 7° IFIEC proposes to remove the word "explicitly otherwise agreed", as it doe not see the interest of this word. Alternatively, this indication should be added to any agreement.	Yes	**Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	IFIEC Europe
3	7	The actual version of the KORRR sets the framework for data exchange models that are unilaterally decided by the TSO. This does not guarantee that those models are the overall most efficient ones. Furthermore, art 3.7 makes the TSOs counterparties, such as DSOs and SGUs, responsible for investing and maintaining the communication systems to exchange data with the TSO. Thus, the TSO is insensible for the costs caused to other parties, and has no strong incentive to take the costs incurred by other parties into account when defining his specifications.	Yes	**Not accepted.** KORRR does not impose neither the DSOs nor the SGUs the use of a specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data to prepare that model. However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the	Belgian DSOs: Eandis, Infrax, Sibelga, ORES, Resa

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Although Art 1.3c does generally state that the TSO applies the principle of optimization between the highest overall efficiency and lowest total costs, the rest of the KORRR does not provide the provisions to ensure the objective application of this principle. • The KORRR does not foresee in processes at which the NRA or other competent authority may interfere, and may challenge whether the data exchange models defined by the TSO is the overall optimum. For the cases where specifications are defined by the TSO (see the articles mentioned above), it is not clear whether the regulator has the role or competence to comment these, approve or disapprove these, or has no role at all.		communication interface point with the TSO. To clarify, KORRR requirements are aligned with the data defined in Title 2 of Regulation (EU) 2017/1485 that represent the maximum set of information that TSOs can request. During SOGL implementation at national level, article 40(5) allows to each TSO, in coordination with DSOs and SGUs and subject to NRAs approval, to establish the scope and applicability of data exchange. It means that TSO can stablish which information under Title 2 is necessary to carry out TSO´s responsibilities defined in the regulation and also TSOs can indicate for which means the exchange data must be used. Once this is defined and approved by NRAs, is applicability is mandatory.	
3	4, 6, 7	- Remove paragraph 6 and in paragraph 4 change the first sentence ending with "...directly to the TSO and/or to the DSO they are connected." to "... TSO or DSO" - Para 7. DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems "until the point of connection/ point of common coupling" to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. For the case of SGUs, physical infrastructure of communication systems will be limited up to its ownership boundary (typically the Point of Common Coupling). Explanation: - Paragraph 6 is not required when this is handled in paragraph 4. There should be single point of contact of the CDSOs or SGUs. Otherwise complexity and the required solution costs will increase. - SGUs should not be made responsible to cover the whole costs of installing and maintaining a whole (physical) communication system that we will be managed	4. Yes 6. Yes 7. Yes	4. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval. 6. **Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as he default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to. 7. **Not accepted.** However, article 3(7) has	WindEurope

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		by the TSO and that might extend for long distances. Thus, the responsibility should end at the point where the SGU is also responsible to comply with the connection code. -It should be clear that SGU are responsible for the installation of physical communication infrastructure (and its maintenance) up to point of ownership boundary between the SGU installation and the TSO or DSO facilities. Any physical infrastructure requiered from the SGU to the relevant TSO control /data centre is the responsability of the relevant TSO or DSO. Need answer: DSOs, CDSOs and SGUs in paragraph 7 are required to be responsible for installation, configuration, security etc. This is true only if the above stated participants are delivering the communication/data solution. What if due to reducing complexity and having unified solution compatible with the TSO SCADA system, the TSO is deciding on delivering their own designed unit? Or does this mean that TSO's are not able to propose any solutions?		been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	
3	8	Proposal: 8. Subject to the agreement with the party that receives the data (TSO or DSO), parties required to provide data under the KORRR shall be allowed to delegate all or part of any tasks assigned to it under Regulation 2017/1485 to one or more third parties like BRP, BSP, aggregators or similar entities, in case the third party can carry out the respective function at least as effectively as the delegating entity. The delegating entity shall remain responsible for ensuring compliance with the obligations under Regulation 2017/1485, including ensuring access to information necessary for monitoring by the regulatory authority. Explanation: 8. TSOs and DSOs must be treated equally regarding this issue.	Yes	**Accepted.** Article 3(8) (article 3(9) of the new KORRR version) has been amended to consider the agreement also with DSO in case of SGUs providing directly data to the DSO .	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
3	8	Delete the last part of the paragraph: "The delegating entity shall remain responsible for ensuring compliance with the obligations under Regulation 2017/1485, including ensuring access to information necessary for monitoring by the regulatory authority." Paragraph 8 should be deleted, as it is unclear whether it consitutes an extension of the provisions of art. 12 of (EU) 2017/1485 or not. To avoid legal uncertainties, the provision of art. 12 should be deemed sufficient for the cases paragraph 12	Yes	**Not Accepted.** Article 3(8) (article 3(9) of the new KORRR version) has been amended to clarify it.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		aims at.			
3	8	Modification proposal: Art. 3.8. "Subject to the agreement of the TSO **or DSO**, parties required to provide data under the KORRR shall be allowed to delegate all or part of any tasks assigned to it under Regulation 2017/1485 to one or more third parties like BRP, BSP, aggregators or similar entities, in case the third party can carry out the respective function at least as effectively as the delegating entity. Justification: It has to be clarified that data can be exchanged either with TSOs or DSOs, in coherence with article 3.4. Therefore data communication with DSOs should be envisaged.	Yes	**Accepted.** Article 3(8) (article 3(9) of the new KORRR version) has been amended to consider the agreement also with DSO in case of SGUs providing directly data to the DSO .	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
3	8	Is this not already covered within Regulation 2017/1485 articles? Does it need to be repeated?	No	**Not accepted.** This article is needed to define how the delegation is to be done and to clearly state where the responsibility remains.	SP Energy Networks
3	8	Art3 8° IFIEC has an issue with "similar entities" as this is very unclear and could exclude certain future actors. Either ENTSO-e clarifies "similar" or replaces it by "other"	Yes	**Accepted.** Article 3(8) (article 3(9) of the new KORRR version) has been amended to clarify it and also the list of examples for third parties has been deleted.	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	4,6,7	"4. Each TSO, in coordination/AGREEMENT with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO and/or to the DSO they are connected. The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO. The quality and granularity of the data shall be maintained or improved" should be changed to: "...and real time data directly to the TSO or to the DSO they are connected..." or even better to "...and real time data directly to the TSO they are connected...." accordingly 5. and 6. "As far as reasonably possible CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to." to "CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to." in addition: "7. DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO." should be changed to "DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of their own communication systems to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO." due to cost reasons According to article 40(7) of the Regulation 2017/1485 the TSO and DSO shall AGREE on effective, efficient and proportional processes for providing and managing data exchanges between them […] and SGUs. The KORRR as implementation of the regulation should reflect that idea and not differ from it.	4. No 6. Yes 7.Yes	4. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) of SO GL is included to highlight the NRA approval. 6. **Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as he default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to.**7.** 7**. Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	RWE Generation SE Stromnetz Hamburg GmbH

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	New1, new2, new3, 1,2,3,4, 5,6,7,8	New 1. This methodology sets out the key organisational requirements, roles and responsibilities in relation to data exchange with TSOs. Each TSO shall have the right but not the obligation to obtain or receive the data set out in Title II of Regulation (EU) 2017/1485 from the owner of the relevant network element or the party responsible for providing the information, as the case may be, provided that all of the following conditions are met: a. the TSO requires the data in order to carry out the operational security analysis in accordance with Article 72 of Regulation (EU) 2017/1485; the set of required data shall be the minimum set that enables the TSO to do so; b. the data are not already available to the TSO: i. either pursuant GLDPM and CGMM; ii. pursuant national legislation or regulation, contractual basis or based upon any other kind of legally binding mechanism; iii. or if the data is publicly available. c. the data are not already available to the respective DSO. In such a case, the data shall be exchanged directly between the TSO and the DSO. New 2. This KORRR does not confer TSOs the right to request data not explicitly described in Title 2 of Regulation (EU) 2017/1485. For avoidance of doubt, data regarding grid elements outside the observability area of the respective TSO are out of scope. New 3. The harmonisation intention of Article 40(6) of Regulation (EU) 2017/1485 shall be understood to refer to the harmonisation of key organisational requirements, roles and responsibilities in relation to data exchange. TSOs shall not invoke the harmonisation requirement in order to obtain data which they do not require for their legal tasks assigned by Regulation (EU) 2017/1485. 1. Each TSO, DSO, CDSO or SGU shall be responsible for the quality of the information they provide regarding their facilities or services. Except where explicitly otherwise stated, they shall be the party required to provide the data. 2. Delete paragraph. 3. Delete paragraph. 4. Distribution connected SGUs shall provide the structural, scheduled and real time data directly to the DSO they are connected to. However, exceptionally, each TSO, in agreement with the DSOs in its Control Area, may define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data directly to the TSO and/or to the DSO they are connected to. When the data is directly provided to the TSO, the TSO shall	New 1.No New 2. No New 3. No 1. Yes 2. Yes 3. Yes 4.Yes 5. No 6. Yes 7. Yes 8. Yes	**New 1 and 3. Not accepted.** SO GL in its title 2 establishes the mandatory data exchange for TSOs, DSO and SGUs without conditions. KORRR requirements are aligned with the data defined in Title 2 of Regulation (EU) 2017/1485 that represent the maximum set of information that TSOs can request. During SOGL implementation at national level, article 40(5) allows to each TSO, in coordination with DSOs and SGUs and subject to NRAs approval, to establish the scope and applicability of data exchange. It means that TSO can stablish which information under Title 2 is necessary to carry out TSO´s responsibilities defined in the regulation and also TSOs can indicate for which means the exchange data must be used. Once this is defined and approved by NRAs, is applicability is mandatory. **New 2. Not accepted.** Although, SO GL does not allow TSOs to request without agreement information under title 2 it doesn´t forbid to manage agreements to exchange them. Additionally not all the data out of the observability area is out of scope, for example there can be SGUs connected out of observability area that have to exchange data with the TSO. 1. **Partly accepted.** Article 3(1) has been amended to reflect “shall wording”. It is consider that in the first part of the actual article, the proposal “Except where explicitly otherwise stated, they shall be the party required to provide the data” it is included. 2. **Accepted**. **Article 3(2) has been deleted** 3. **Accepted. Article 3(3) has been deleted**	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		provide it to the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO. 5. No change. 6. CDSOs, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to. 7. DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems, excluding the communication channel, to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. 8. No change. Explanation: The additional first three paragraphs are necessary to make sure fundamental principles of European Union law are respected, this is: the principle of proportionality (Article 5(4) of the Treaty on European Union), the principle of subsidiarity (Article 5(3) of the Treaty on European Union) and the principle of data scarcity (e.g. laid down in article 6(1) of (EU) 2016/679). The change in paragraph 1. is necessary to adapt the wording to a form suitable to legal documents. Paragraph 2. and 3. should be deleted, as they refer solely to parties offering services to TSOs. From our point of view, services provided to TSOs and any obligation stemming from that should not be defined in KORRR, but can be bilaterally agreed when procuring such services. Paragraph 4 should define cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the TSO-DSO data management report (page 16 of the report:"Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]" Paragraph 4. sentence 1 should be changed from "coordination" to "agreement", as agreement is required by article 40(7) of (EC) 2017/1485 for all data exchanges related to distribution systems. Sentence 2 should be deleted as it creates inefficiencies and legal and economic uncertainties and risks if multiple decisions on data exchange are possible for each and every SGU. In sentence 3, "make it available" must be changed into "provide it", as TSOs are obliged to provide it to the DSO to fulfill their obligations from 72/EC/2009, art. 12 e):"Each transmission system operator shall be responsible for:(e)providing to the operator of any other system with which its system is interconnected sufficient		4. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) is included to highlight the NRA approval. 5. **No action** 6. **Not accepted.** On the basis or articles 48 to 50 and 53 of SOGL the KORRR renders the provision of data both to the TSO and to the DSOs as he default option. Article 3(6) (article 3(2) of the new KORRR version) has been amended to reflect the possibility that at national level this approach can be revised in order to allow SGUs the provision of data only to the TSO or to the DSO they are connected to. 7. **Not accepted.** However, article 3(7) has been split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO. 8. **No action.** However article 3(8) (article 3(9) of the new KORRR version) has been amended to clarify it. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to the new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national. Related TSO-DSO data management report a	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		information to ensure the secure and efficient operation, coordinated development and interoperability of the interconnected system;" Data related to SGUs at the distribution system is unquestionably necessary to ensure the secure and efficient operation of the (distribution) system. The last sentence of paragraph 4 should be deleted, as it is unclear how quality and/or granularity of data could be improved by the receiving party. Furthermore, when assuming cascaded data exchange, the highest efficiency lever is untapped by data aggregation and thus refinement. Such solutions are prohibited by the requirement contained in the last sentence without any necessity nor justification. Paragraph 6 should explicitly prohibit duplicated data transfer, as it is inefficient and constitutes unnecessary costs to stakeholders. In paragraph 7 it cannot be the sole responsibility of the DSOs, CDSOs and SGUs for the installation, configuration, security and maintenance of the communication channels. The TSO has an equal responsibility.		clarification should be done. KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	
3	2, 4	Article 3(2), 3(4) - This is a requirement of Regulation 2017/1485, and is incumbent upon each TSO to define and therefore shouldn't be within the KORRR . REMOVE reference.	2.Yes 4.Yes	2. **Accepted**. **Article 3(2) has been deleted** 4. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) read in conjunction with Articles 58 to 50 and 53 of SO GL. A reference to Article 40(5) is included to highlight the NRA approval. Additionally, as Articles 3(2) and 3(3) have been deleted, a new article 1(3) has been added to new KORRR version to consider national flexibility for defining requirements for service provision to the System. As aggregations purpose is to offer service to the System, they shall be defined at national.	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
3	New 9	**New paragraph 9**: Even more important than confidentiality is privacy. One could argue that, when we speak about data exchange TSO-DSO, we do not immediately think of data of an individual person, but is not excluded by KORRR. It might become even realistic when low voltage grid users start to deliver balancing services to the TSO, for example with sanitary heat boilers, through an aggregator. In that case, we all have to comply with the European General Data Protection Regulation (GDPR), which imposes a lot of things in order to have robust processes (audited), to guarantee that individual data are not divulged, and that each individual person can always know who does what with data about him.	No	**Not accepted.** Both KORRR and article 12 of SO GL on confidentiality obligations refer to "other relevant Union legislation" therefore also including the General Data Protection Regulation.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
4	0	If the responsibility etc exists in SOGL to share data with third parties, it should be left to be covered in the SOGL and should not be covered in KORRR Delete the article	No	**Not accepted** This article stablishes the confidentiality framework for KORRR.	Energy Networks Association
4	0	2) The consulted version of the KORRR lacks any reference to the General Data Protection Regulation. Article 4 (“confidentiality”) seeks to protect the confidentiality of data, this may not be sufficient, especially in the case where data of private persons are used. Article 4 should also specify that the TSO and his counterparties with whom he exchanges data with, shall collaborate where needed, to enable each other to demonstrate compliance with the European General Data Protection Regulation. This is especially relevant if personal data are exchanged. Personal data may be involved in cases where for example balancing services are supplied to the TSO – through an aggregator - by low voltage grid users (e.g. by electrical vehicles, home batteries, heating or cooling devices…). In this case, depending on the data exchange models that the TSO and relevant DSO should jointly elaborate, there could be an exchange of personal data related to the grid users that participate to this service (although the first approach should be to avoid this wherever possible). In the proposed version of the KORRR, Article 4 still leaves the door open to share data amongst TSOs (art 4.6) or regulators (4.7) without specifying detailed procedures or conditions before doing so. Even if these parties can be considered as trusted, commercially neutral parties and bound to confidentiality obligations (which must be verified how this is defined on European level), the sharing of data may still be an infringement against the GDPR if no further measures are taken to ensure full transparency towards the end customers, on	No	**Not accepted** Both KORRR and article 12 of SO GL on confidentiality obligations refer to "other relevant Union legislation" therefore also including the General Data Protection Regulation.	Belgian DSOs: Eandis, Infrax, Sibelga, ORES, Resa

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		who has insight in their data and for which purpose.			
4	4,6,8	4. According to Article 40(10) of Regulation 2017/1485, DSOs with a connection point to a transmission system shall be entitled to receive the relevant Structural, Scheduled and Real Time information from the relevant TSOs and to gather the relevant Structural, Scheduled and Real Time information from the neighbouring DSOs. Neighbouring DSOs shall determine, in a coordinated manner, the scope of information that may be exchanged. Paragraph 4 must be exchanged against an unmodified copy of article 40(10) of (EU) 2017/1485. The original version of this paragraph constitutes a restriction of rights of DSOs stemming from art. 40(10), which is inacceptable. A prerequisite for paragraph 6 is that the NRA is obliged to treat the data that he receives from system operators as confidential. If not, this paragraph would open the door to breach confidentiality via regulators. Paragraph 8 should be deleted, as it is unclear whether it consitutes an extension of the provisions of art. 12 of (EU) 2017/1485 or not. To avoid legal uncertainties, the provision of art. 12 should be deemed sufficient for the cases paragraph 12 aims at.	4.No 6.No 8.No	4. **Not accepted.** Article 4 (4) (article 5(3) of the new KORRR version) doesn't forbid the DSO may have access to further information respect to the connection point but it specifies that further requests shall be justified by operational security reasons and after agreement with TSO 6. **Not accepted.** Article 4(1) of KORRR states that all data affected by the KORRR shall be confidential and that each party receiving data according to the KORRR shall implement appropriate technical and organizational measures to ensure that data is not divulged to any other person or authority. NRAs shall respect Art. 4(1). 8. **Not accepted** Article 4(8) (article 5(6) of new version) is not an extension of provisions in article 12 of SO GL but a definition of the conditions to share any data under that article	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				of the SO GL.	
4	1	1. Delete paragraph. Paragraph 1 should be deleted, as it is very similar but not identical to the provisions of article 12 of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other.	No	Not accepted This article stablishes the confidentiality framework for KORRR.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
4	4	Proposal: 4. DSOs and CDSOs shall have access to the Structural, Scheduled and Real Time information of the commissioned facilities of the Transmission Network in their connection point. Upon justification of the need of the information for operational security reasons, reliable dynamic simmulations of their grids, they may request to the TSO further structural or Real Time information from commissioned facilities in the Transmission System of the Control Area they are connected and other Transmission Systems with an influence on their networks. When the request of information comes from a CDSO, it shall not include the Connection Point of other CDSOs or SGUs. TSOs shall refuse to provide this information only if DSOs or CDSOs don't provide a solid justification of the need of the information for operational security reasons. Explanation: 4. Operational security in distribution networks is affected by: - commisioned facilities in its TSO system (mainly power-generating modules, demand facilities and substations). - commisioned facilities in other adjacent TSOs systems (i.e spanish distribution systems are affected by french and portuguese transmission systems) Additionally, access to data for operational security reasons shall be guaranteed as long as a solid justification is provided. DSOs are regulated entities with responsibilities in SoS and QoS that must fulfill severe confidentiality requirements; therefore, data shall not be denied to them.	Yes	**Accepted**. Article 4(4) (article 5(3) of the new KORRR version) is reworded to take into account the Dynamic simulations and to reflect the need of a justification for the DSO.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
4	4	Proposal: DSOs and CDSOs shall have access to the Structural, Scheduled and Real Time information of the commissioned facilities of the Transmission Network in their connection point. Upon justification of the need of the information for operational security reasons, they may request further structural or Real Time information from commissioned facilities of the Transmission System of the Control Area they are connected or the adjacent ones. When the request of information comes from a CDSO, it shall not include the Connection Point of other CDSOs or SGUs. TSOs may give positive or justified negative answer to the request. Explanation:	Yes	**Not accepted.** However new articles 6 (7) and 6(8) of new KORRR version have been added to reflect the necessity stated,	Swissgrid

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		If the DSO is near the Country boarder, he could need some information of the network elements out of the connected control area to do calculations. So he should be able to get the data from the adjacent control zones if needed.			
4	6	6. Competent National Regulatory Authorities shall have access to all information exchanged according to the KORRR upon motivated request. The NRAs are obliged to treat the data they receive from TSOs and/or DSOs as confidential.	No	**Not accepted.** Article 4(1) of KORRR states that all data affected by the KORRR shall be confidential and that each party receiving data according to the KORRR shall implement appropriate technical and organizational measures to ensure that data is not divulged to any other person or authority. NRAs shall respect Art. 4(1).	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
4	5	Proposal: Art 4.5 – "SGUs shall have access to the Structural, Scheduled and Real Time information of the commissioned facilities of the Transmission System or Distribution System in their connection point. I shall not include the Connection Point of other CDSOs or SGUs". Explanation: SGUs shall have also access to scheduled information.	Yes	**Accepted.** Article 4(5) (article 5(4) of new KORRR version) has been amended to include scheduled data.	EDF
4	8	8. Delete paragraph.	No	**Not accepted.** No reason added in the comment.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
4	6	Competent National Regulatory Authorities shall have access to all information exchanged according to the KORRR upon request. Real time data, however, shall be requested only in the form of a report, presenting archival data from the period indicated in the request. Explanation: The proposed provision from Article 4 (6) of the KORRR document may raise interpretations concerns, especially regarding NRAs access to DSOs' SCADA systems. Without this change DSOs are concerned about the possibility of NRAs may request the direct access to the DSOs' SCADA system, which technically is highly complicated.	No	**Not accepted.** As stated in Article 4 (6) (article 5(5) of new KORRR version), NRAs will not receive data by default, only upon request. In line with this, conditions to receive this data are not currently defined in the KORRR and shall be defined following the request from the NRA.	PTPiREE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
4	7	Proposal: 7. Subject to the confidentiality obligations set out in Article 12 of Regulation 2017/1485, TSOs may share the data obtained with all other TSOs that have fully implemented the requirements set out in KORRR proposal. With this regard, the data exchange shall be only posible if needed by the TSO to fulfill its resposabilities. Explanation: 7. According to SO GL Art 12(4)	NO	**Not accepted.** The obligation to exchange the data only to fulfil their responsibilities is already covered by the reference to Article 12 of Regulation 2017/1485.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
4	New	New 9. If there is an exchange of personal data between TSO and DSO, TSO and DSO collaborate to enable each other to be compliant with the GDPR (European General Data Protection Regulation). New paragraph 9: Even more important than confidentiality is privacy. One could argue that, when we speak about data exchange TSO-DSO, we do not immediately think of data of an individual person, but is not excluded by KORRR. It might become even realistic when low voltage grid users start to deliver balancing services to the TSO, for example with sanitary heat boilers, through an aggregator. In that case, we all have to comply with the European General Data Protection Regulation (GDPR), which imposes a lot of things in order to have robust processes (audited), to guarantee that individual data are not divulged, and that each individual person can always know who does what with data about him.	No	**Not accepted.** Both KORRR and article 12 of SO GL on confidentiality obligations refer to "other relevant Union legislation" therefore also including the General Data Protection Regulation. It also referees to national law or other	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
4	-	1. Delete paragraph. 2. No change. 3. No change. 4. According to Article 40(10) of Regulation 2017/1485, DSOs with a connection point to a transmission system shall be entitled to receive the relevant Structural, Scheduled and Real Time information from the relevant TSOs and to gather the relevant Structural, Scheduled and Real Time information from the neighbouring DSOs. Neighbouring DSOs shall determine, in a coordinated manner, the scope of information that may be exchanged. 5. No change. 6. Competent National Regulatory Authorities shall have access to all information exchanged according to the KORRR upon motivated request. The NRAs are obliged to treat the data they receive from TSOs and/or DSOs as confidential. 7. No change.	1.No 2. No 3. No 4. No 5. No 6. No 7. No 8. No New 9. No	1. **Not accepted This** article stablishes the confidentiality framework for KORRR 2. **No action** 3**. No action** 4. **Not accepted.** Article 4 (4) (new articles 5(3) of new KORRR version) doesn't forbid the DSO may have access to further information respect to the connection point but it specifies that further requests shall be justified by operational security reasons and after agreement with TSO 5. **No action** 6. Article 4(1) of KORRR states that all data affected by the KORRR shall be confidential	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		8. Delete paragraph. New 9. If there is an exchange of personal data between TSO and DSO, TSO and DSO collaborate to enable each other to be compliant with the GDPR (European General Data Protection Regulation). Explanation: Paragraph 1 should be deleted, as it is very similar but not identical to the provisions of article 12 of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other. Paragraph 4 must be exchanged against an unmodified copy of article 40(10) of (EU) 2017/1485. The original version of this paragraph constitutes a restriction of rights of DSOs stemming from art. 40(10), which is inacceptable. A prerequisite for paragraph 6 is that the NRA is obliged to treat the data that he receives from system operators as confidential. If not, this paragraph would open the door to breach confidentiality via regulators. Paragraph 8 should be deleted, as it is unclear whether it consitutes an extension of the provisions of art. 12 of (EU) 2017/1485 or not. To avoid legal uncertainties, the provision of art. 12 should be deemed sufficient for the cases paragraph 12 aims at. New paragraph 9: Even more important than confidentiality is privacy. One could argue that, when we speak about data exchange TSO-DSO, we do not immediately think of data of an individual person, but is not excluded by KORRR. It might become even realistic when low voltage grid users start to deliver balancing services to the TSO, for example with sanitary heat boilers, through an aggregator. In that case, we all have to comply with the European General Data Protection Regulation (GDPR), which imposes a lot of things in order to have robust processes (audited), to guarantee that individual data are not divulged, and that each individual person can always know who does what with data about him.		and that each party receiving data according to the KORRR shall implement appropriate technical and organizational measures to ensure that data is not divulged to any other person or authority. NRAs shall respect Art. 4(1). 7. **No action**. 8. **Not accepted.** Article 4(8) (article 5(6) of new version) is not an extension of provisions in article 12 of SO GL but a definition of the conditions to share any data under that article of the SO GL. **New 9**. **Not accepted.** Both KORRR and article 12 of SO GL on confidentiality obligations refer to "other relevant Union legislation" therefore also including the General Data Protection Regulation. It also refers to national law or other.	
4	New	Proposal: NEW 9. If there is an exchange of personal data between TSO and DSO, TSO and DSO collaborate to enable each other to be compliant with the GDPR (European General Data Protection Regulation).	No	**Not accepted.** Both KORRR and SO GL article 12 on confidentiality obligations refer to "other relevant Union legislation" therefore also including the General Data Protection Regulation. It also refers to national law or	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Explanation: 9. We all have to fulfill with the European General Data Protection Regulation (GDPR), which imposes a lot of requirements in order to have robust processes (audited), to guarantee that individual data are not divulged, and that each individual person can always know who does what with data about him.		other.	
4	New	Proposal: New paragraph – "Data cannot be used by for anything not defined in Regulation 1485/2017." Explanation: Data cannot be used by for anything other than their intended purpose.	No	**Not accepted.** Confidentiality of the information and use only for the purpose defined in regulation 2017/1485 is already defined in Article 12 of SO GL and Article 4 of KORRR.	EDF
4	**New 9**	It needs to be stated somewhere that a TSO cannot seek data from a DSO not in its control area, even if that DSO is in its observability area. Such data must come from the TSO in whose control area the DSO is	Yes	**Accepted.** New paragraphs in article 6 of new KORRR version (Responsibilities of TSOs) have been added to clarify this point.	Energy Networks Association
5	0	Everywhere the article says "DSOs" should be added "and CDSOs" The comment on CDSOs is valid for all of the document as clarification, as according to DCC DSOs and CDSOs are to be considered on the same level, and thus this would increase the readability of the document if this would be added everywhere.	Yes	.**Accepted**. A new article 1(4) has been added to the new KORRR version to reflect closed distribution system roles that shall apply in the KORRR.	IFIEC Europe
5	0	Moreover, as a general comment, it would also be advisable to add an article on how grid users can get data from the TSOs, as the article mainly describes the general responsibilities towards other TSOs, but not towards grid users.	No	**Not accepted.** Articles 4(2) and 4(5) of KORRR (articles 5(1) and 5(4) of new KORRR version) reflects the SGU´s access to data from the TSOs or DSOs	IFIEC Europe
5	2	Proposal: 2. Each TSO shall define the observability area of the connected distribution network of its control area according to the methodology of Article 75 Regulation 2017/1485 and communicate it to the affected DSOs. In general, it shall be no more than a lower voltage level. Explanation: 2. It is necessary to limit the grid voltage level that will be considered as observability area by the TSO.	No	**Not accepted.** The determination of the observability area cannot be limited in the KORRR because it has to be defined in the methodology developed according to Article 75 of SO GL.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
5	4	**New** 4. Each TSO shall provide updated information of their transmission system that is part of the observability area of neighbouring DSOs to those DSOs. New paragraph 4. Following the state of the art, some DSOs have their own observability areas stretching out to elements of the transmission system. To account for that and to ensure the necessary observability for DSOs as defined in whereas-section (2) of KORRR, TSOs should be obliged to provide data relating to the transmission system to neighbouring DSOs.	No	**Not accepted.** Drafting of KORRR takes into consideration Article 40(10) of the SO GL. In line with it, Article 4 (4) of KORRR (article 5(3) of new KORRR version) allows the DSOs to access the data from the transmission system that may have impact in their grid. The update of that information in reflected in Article 7.2 of KORRR (article 8(2) of new KORRR version). Processes to exchange data among neighbouring DSOs shall be agreed between relevant DSOs.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
5	2	2. According to Article 43(1) of Regulation (EU) 2017/1485, each TSO shall determine the observability area of the transmission-connected distribution systems which is needed for the TSO to determine the system state accurately and efficiently, based on the methodology developed in accordance with Article 75. Paragraph 2 provides provisions very similar but not identical to the provisions of article 43 of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other. To avoid any legal uncertainty, competing provisions should be avoided. To account for it, an identical copy of the provisions of (EU) 2017/1485 is a solution.	Yes	**Accepted**. Article 5(2) (article 6(2) of new KORRR version) has been amended to include only the requirement to communicate the observability area to the parties involved.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
5	5	5. TSOs shall use the information platform developed in accordance with Article 114 of Regulation 2017/1485 to exchange structural and scheduled information with other TSOs. Paragraph 5 should be adapted to ensure TSOs use OPDE, as the establishment of another, parallel system for the same type of data would be inefficient.	Yes	**Accepted.** Article5 (5) (new article 6 (9) of new KORRR version)has been amended.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
6	1,2,3	1. Delete paragraph. 2. Each TSO shall store electronically the structural data of the electric system as long as it is necessary to fulfill its legal tasks. The storage shall contain the information from the Transmission System, from the observability area in the Distribution Networks, from the observability area in neighbouring Transmission Systems and from the SGU according to articles 41, 43, 45, 48, 51 and 52 of Regulation 2017/1485.	1.- Yes 2.-Yes 3.- Yes	1. **Accepted.** Article 5(1) has been deleted. 2. **Partially accepted**. Article 6(2) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. This new article reflects that time to store structural information will be defined by national	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		3. Each TSO shall specify the format and may publish templates for the structural data that transmission-connected SGUs shall provide. Each TSO shall agree with the DSO on the format and may publish templates for the structural data that the DSO and distribution-connected SGUs shall provide. When doing so, each TSO shall take into account and complement, where necessary, the definitions provided following Article 18 of GLDPM and GLDPM v2. Paragraph 1 should be deleted, as it is very similar but not identical to the provisions of article 40(2) and 40(3) of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other. To avoid any legal uncertainty, competing provisions should be avoided. Furthermore, paragraph 1 seems to go beyond what is provided for in article 40(2) and 40(3) of (EU) 2017/1485. TSOs are not entitled to define provisions going beyond (EU) 2017/1485. Paragraph 2 should limit data storage to the time period data is necessary to fulfill legal tasks. As soon as it is no longer necessary, such data should be deleted, following the principle of data scarcity. Paragraph 3 should be adapted to respect the provisions contained in Article 40(7) of (EU) 2017/1485 and oblige TSOs to take into account what is already defined stemming from GLDPM. Any parallel defintion of data formats etc. would be inefficient and cause unjustified costs to stakeholders.		legislation. 3. **Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
5	-	1. No change. 2. According to Article 43(1) of Regulation (EU) 2017/1485, each TSO shall determine the observability area of the transmission-connected distribution systems which is needed for the TSO to determine the system state accurately and efficiently, based on the methodology developed in accordance with Article 75. 3. No change. New 4. Each TSO shall provide updated information of their transmission system that is part of the observability area of neighbouring DSOs to those DSOs. 4. No change. 5. TSOs shall use the information platform developed in accordance with Article 114 of Regulation 2017/1485 to exchange structural and scheduled information with other TSOs. Explanation: Paragraph 2 provides provisions very similar but not identical to the provisions of article 43 of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other. To avoid any legal uncertainty, competing provisions should be avoided. To account for it, an identical copy of the provisions of (EU) 2017/1485 is a solution. New paragraph 4. Following the state of the art, some DSOs have their own observability areas stretching out to elements of the transmission system. To account for that and to ensure the necessary observability for DSOs as defined in whereas-section (2) of KORRR, TSOs should be obliged to provide data relating to the transmission system to neighbouring DSOs. Paragraph 5 should be adapted to ensure TSOs use OPDE, as the establishment of another, parallel system for the same type of data would be inefficient.	1. No 2. Yes 3. No New 4. No 4. No 5. Yes	1. No action 2. Accepted. Article 5(2) (article 6(2) of new KORRR version) has been amended to include only the requirement to communicate the observability area to the parties involved. 3. No action New 4. Drafting of KORRR takes into consideration Article 40(10) of the SO GL. In line with it, Article 4 (4) of KORRR (article 5(3) of new KORRR version) allows the DSOs to access the data from the transmission system that may have impact in their grid. The update of that information in reflected in Article 7.2 of KORRR (article 8(2) of new KORRR version). Processes to exchange data among neighbouring DSOs shall be agreed between relevant DSOs. 4.- No action 5. Accepted.. Article5 (5) (new article 6 (9) of new KORRR version) has been amended.	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
5	New	Proposal: NEW. Each TSO shall provide updated information of the neighbouring TSO network which is part of the observability area of DSO to those DSOs. Explanation: All data flow should be bidirectional. Not only the DSO shall provide data for neighbouring TSO also neighbouring TSO shall provide data to neighbouring DSOs if they are part of the observable area of the DSO.	Yes	**Partially accepted.** New articles 6 (7) and 6(8) of new KORRR version have been added to reflect the necessity stated,	Swissgrid
6	1	This seems to be already covered by various Articles in Regulation 2017/1485, so does it need to be repeated in the KORRR as well?	Yes	**Accepted.** Article 6(1) has been deleted.	SP Energy Networks
6	3	3. Each TSO shall specify the format and may publish templates for the structural data that transmission-connected SGUs shall provide. Each TSO shall agree with the DSO on the format and may publish templates for the structural data that the DSO and distribution-connected SGUs shall provide. When doing so, each TSO shall take into account and complement, where necessary, the definitions provided following Article 18 of GLDPM and GLDPM v2. Paragraph 3 should be adapted to respect the provisions contained in Article 40(7) of (EU) 2017/1485 and oblige TSOs to take into account what is already defined stemming from GLDPM. Any parallel defintion of data formats etc. would be inefficient and cause unjustified costs to stakeholders.	Yes	**Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
6	3	Proposal: Each TSO shall agree with DSO and SGU on the common format and templates for the structural data that DSOs and SGUs shall provide. The for-mat or templates have to include the detailed content of the structural data that have to be provided. Explanation: Some countries, e.g. Germany have more than one TSO. It is not cost efficient to apply new formats or to use different format for each control area.	Yes	**Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	TIWAG-Tiroler Wasserkraft AG - Dispatching

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
6	3	Proposal: 3. Each TSO shall specify the format and publish templates for the structural data that SGUs shall provide. The format or template have to include the detailed content of the structural data that have to be provided. Explanation: 3. DSOs shall not be included in this provision because the format of data exchanges between DSOs and TSOs shall be agreed according to art 40(7) of the GL SO. On the other hand, publication of templates should not be voluntary. Finally, this provision (only applicable to SGUs) should be moved to art. 3 because it is not related to data storage.	Yes	**Accepted**. Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
6	3	Proposal: Art.6-3 – "Each TSO shall specify the format and shall publish templates for the structural data that DSOs and SGUs shall provide, in coordination with them. The format or template have to include the detailed content of the structural data that have to be provided". Explanation: The format for the structural data that DSOs and SGUs shall provide needs to be discussed between TSOs and DSOs and SGUs. Moreover, these IT systems to exchange data are very costly and an evolution of format requires time and would lead to additional costs for DSOs and SGUs. Therefore, it is necessary that the formats remain as stable as possible. Finally, for purpose of transparency, EDF considers that TSOs shall (and not "may") publish templates.	Yes	**Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	EDF
6	3	3. Each TSO shall AGREE with DSO and SGUs on the COMMON format and may publish templates for the structural data that DSOs and SGUs shall provide. The format or template have to include the detailed content of the structural data that have to be provided. Some countries, e.g. Germany, have more than one TSO. It is not cost efficient to apply new formats or to use different formats for each control area. According to article 40(7) of the Regulation 2017/1485 the TSO and DSO shall AGREE on effective, efficient and proportional processes for providing and managing data exchanges between them […] and SGUs. The KORRR as implementation of the regulation should reflect that idea and not differ from it.	Yes	**Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	Stromnetz Hamburg GmbH RWE Generation SE BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
6	2	2. Each TSO shall store electronically the structural data of the electric system as long as it is necessary to fulfill its legal tasks. The storage shall contain the information from the Transmission System, from the observability area in the Distribution Networks, from the observability area in neighbouring Transmission Systems and from the SGU according to articles 41, 43, 45, 48, 51 and 52 of Regulation 2017/1485. Paragraph 2 should limit data storage to the time period data is necessary to fulfill legal tasks. As soon as it is no longer necessary, such data should be deleted, following the principle of data scarcity.	Yes	Partially accepted. Article 6(2) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. This new article reflects that time to store structural information will be defined by national legislation.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
7	1	1. Each TSO shall review the structural information it shares with other TSOs and DSOs at least every 6 months and provide updated information of the observability area to the neighbouring TSO and DSO in the following situations: a) to e): No change. DSOs are system operators as well and shall be treated as such. According to Article 40(10) of Regulation 2017/1485, "DSOs with a connection point to a transmission system shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs." This entitlement encompasses updates, as information can only be relevant if it is up to date. Definition of error needed: What does "error" mean in paragraph 1 (d)? Does it mean an error in the data set transmitted earlier or does it mean a malfunction of the SGU?	1.-No 2.-Yes	1. Not accepted. Article 7 (1) (article 8(1) of new KORRR version) reflects updates between TSOs while article 7(2) (article 8(2) of new KORRR version) reflects the possibility for DSOS and SGUs to request updated information to the TSO according to article 5(4) (article 5(3) of new KORRR version). 2. Accepted. Article 7(1) (article 8(1) of new KORRR version) has been amended to clarify that “error” means an error in the data set transmitted earlier	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
6	3	Art 6(3) This is already covered in Arts 43, 45, 48 and 53 of SOGL. Can delete this paragraph.	Yes	Not Accepted. Article 6(3) reflects the requirement stated in article 40 (6) of SO GL that should be covered by the KORRR it does not reflect the data that has to be exchange mention in articles 43, 45, 48 and 53 of SO GL. However, article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
6	-	1. Delete paragraph. 2. Each TSO shall store electronically the structural data of the electric system as long as it is necessary to fulfill its legal tasks. The storage shall contain the information from the Transmission System, from the observability area in the Distribution Networks, from the observability area in neighbouring Transmission Systems and from the SGU according to articles 41, 43, 45, 48, 51 and 52 of Regulation 2017/1485. 3. Each TSO shall specify the format and may publish templates for the structural data that transmission-connected SGUs shall provide. Each TSO shall agree with the DSO on the format and may publish templates for the structural data that the DSO and distribution-connected SGUs shall provide. When doing so, each TSO shall take into account and complement, where necessary, the definitions provided following Article 18 of GLDPM and GLDPM v2. Explanation: Paragraph 1 should be deleted, as it is very similar but not identical to the provisions of article 40(2) and 40(3) of (EU) 2017/1485. Providing similar but deviating provisions in this methodology will lead to legal uncertainties for stakeholders, as it is not immediately clear which document has to be respected when provisions deviate from each other. To avoid any legal uncertainty, competing provisions should be avoided. Furthermore, paragraph 1 seems to go beyond what is provided for in article 40(2) and 40(3) of (EU) 2017/1485. TSOs are not entitled to define provisions going beyond (EU) 2017/1485. Paragraph 2 should limit data storage to the time period data is necessary to fulfill legal tasks. As soon as it is no longer necessary, such data should be deleted, following the principle of data scarcity. Paragraph 3 should be adapted to respect the provisions contained in Article 40(7) of (EU) 2017/1485 and oblige TSOs to take into account what is already defined stemming from GLDPM. Any parallel defintion of data formats etc. would be inefficient and cause unjustified costs to stakeholders.	1. Yes 2. Yes 3. Yes	**1. Accepted.** This article has been deleted. **2. Partially accepted**. Article 6(2) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. This new article reflects that time to store structural information will be defined by national legislation. **3. Accepted.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
6	New	Proposal: NEW 4. Each TSO shall electronically store the information at least only during the necessary time to comply with its tasks. Explanation: 4. "At least" is too ambigous. Data Storage should be restricted to only the	Yes	**Partially accepted**. Article 6(2) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. This new article reflects that time to store structural information will be defined by national	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		necessary time.		legislation.	
7	1	Proposal: 1. Each TSO shall review the structural information it shares with other TSOs and DSOs at least every 6 months and provide updated information of the observability area to the neighbouring TSO and DSOs in the following situations: ◦ a. At least 3 months before commissioning of a new network element or facility; Explanation: 1. DSOs are system operators as well and shall be treated as such. According to Article 40(10) of Regulation 2017/1485, "DSOs with a connection point to a transmission system shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs." This entitlement encompasses updates, as information can only be relevant if it is up to date.	No	**Not accepted.** Article 7 (1) (article 8(1) of new KORRR version) reflects updates between TSOs while article 7(2) (article 8(2) of new KORRR version) reflects the possibility for DSOS and SGUs to request updated information to the TSO according to article 5(4) (article 5(3) of new KORRR version).	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
7	2	2. According to the information stated in the Articles 4(5), SGUs may request the update of the structural data to its TSO. DSOs are system operators as well and shall be treated as such. According to Article 40(10) of Regulation 2017/1485, "DSOs with a connection point to a transmission system shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs." This entitlement encompasses updates, as information can only be relevant if it is up to date.	No	**Not accepted.** Article 7 (1) (article 8(1) of new KORRR version) reflects updates between TSOs while article 7(2) (article 8(2) of new KORRR version) reflects the possibility for DSOS and SGUs to request updated information to the TSO according to article 5(4) (article 5(3) of new KORRR version).	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
7	1	With respect to significant modifications, it is important to add that the timing of such modifications can be adapted during the on-going work. This should also be reflected in this article. Moreover, the article should also foresee a bullet for unforeseen events (e.g. accident, explosion, ...) which would change the structural data from the site but which cannot by there nature be communicated at least three months in advance (and which are not covered by point e on errors, as these relate to data errors)	Yes	**Accepted.** Article 7 (1) (article 8(1) of new KORRR version) has been reworded to take into account first part of the comment as second part is related to SGU chapter. This is why a new point 15(1) (e) in the new KORRR version was added to reflect second part of the comments related to the situation of unforeseen modifications,	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
8	2	Scheduled data exchange between TSOs and DSOs is beyond the scope of KORRR and has no corresponding article within Regulation 2017/1485. Needs clarification. Also not appropriate for KORRR to impose standards on DSOs and SGUs without their consultation.	No	**Not accepted.** Exchange of outage planning data between TSOs and DSOs is relevant for the operation of the system. It is reflected in Part III; Title 3 of the SO GL and the implementation methodologies of CACM like the GLDPM. KORRR does not impose any specific standard, it recommends the adoption of international standards.	SP Energy Networks
7	-	1. Each TSO shall review the structural information it shares with other TSOs and DSOs at least every 6 months and provide updated information of the observability area to the neighbouring TSO and DSO in the following situations: a) to e): No change. 2. According to the information stated in the Articles 4(5), SGUs may request the update of the structural data to its TSO. Explanation: DSOs are system operators as well and shall be treated as such. According to Article 40(10) of Regulation 2017/1485, "DSOs with a connection point to a transmission system shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs." This entitlement encompasses updates, as information can only be relevant if it is up to date.	No	**Not accepted.** Article 7 (1) (article 8(1) of new KORRR version) reflects updates between TSOs while article 7(2) (article 8(2) of new KORRR version) reflects the possibility for DSOS and SGUs to request updated information to the TSO according to article 5(4) (article 5(3) of new KORRR version).	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
7	-	Article 7 - clarification As the data exchange from the TSO to the DSO is not mentioned in the KORR document, it should be added in Article 7. Alternatively an additional article can be added. The networks of TSO and DSO are connected. Changes in the grid of the DSO affect the TSO and vice versa. Though, the DSO should get the same quality and quantity of information from the TSO.	No	**Not accepted.** The requirements to exchange data from TSO to DSOs are defined in article 5(4) of KORRR (article 5(3) of new KORRR version).	EnBW Energie Baden-Württemberg AG BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
8	1	Proposal: 1. Each TSO shall be capable of exchanging scheduled data with NEMOS, SGUs, DSOs or third parties to whom the exchange of scheduled information may have been delegated. Scheduled data shall at least include the generation and load schedules resulting from markets trade between Day ahead and real time, unavailability or limitations to active power production or consumption of SGUs, unavailability of network elements of DSOs in the TSO's observability area. TSOs are not allowed to require SGUs to send scheduled data concerning hours that have not been settled yet in the day ahead market. Explanation: UPM-Kymmene Oyj supports the idea proposed by ENTSO-E in article 8 (1) but wishes to make a clarifying amendment to the proposal. To ensure the accuracy of demand-generation balance information, UPM-Kymmene Oyj proposes an amendment to rule out the possibility of TSOs to require SGUs to send scheduled data concerning hours that have not been settled yet in the day ahead market. UPM-Kymmene Oyj suggests that scheduled data is sent to TSOs only after the settlement of day ahead orders as stated as a minimum requirement in article 8 (1). This would better reflect the consumption and generation patterns that are likely to take place as consumption and generation forecasts made before day-ahead trading do not include the effect of actualized price dependent orders. This data does not take into account e.g. the demand flexibility taking place in industrial electricity consumption. The amendment would also prevent possible additional regulatory burden to industrial electricity consumption units with possibility to demand flexibility.	No	**Not accepted.** Scheduled data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service. Financial settlement is out of the scope of the KORRR.	UPM-Kymmene Oyj
8	1	1. Each TSO shall be capable of exchanging scheduled data with SGUs, DSOs or third parties to whom the exchange of scheduled information may have been delegated. Scheduled data shall at least include the generation and load schedules resulting from market trades between Day ahead and real time, unavailability or limitations to active power production or consumption of SGUs, unavailability of network elements of DSOs in the TSO's observability area. "Paragraph 1 should avoid referring to NEMOs, as NEMOs are not subject of (EU) 2017/1485 and therefore should not be subject of KORRR.	Yes	**Accepted.** Article 8(1) (article 9(1) of new KORRR version) has been amended and the reference to NEMOs has been deleted.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
8	2	Art 8(2) The format of data between a TSO and DSOs and SGUs in its control area is the subject of Articles 43-55. It is not appropriate to impose a standard only necessary for the communication between TSOs onto DSOs and SGUs. Delete this paragraph.	Yes	**Not accepted** Article 8(2) reflects the requirement stated in article 40 (6) of SO GL that should be covered by the KORRR it does not reflect the data that has to be exchange mention in articles 43-55 of SO GL. . KORRR does not impose any specific standard, it recommends the adoption of international standards However, article 8(2) has been split into 2 articles (9(2) and 9(3) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL. Related to the use of harmonised data format for data exchange among TSO as per 114 of SO GL has to be define by TSOs is reflected in article 6(9) of new version of KORRR	Energy Networks Association
8	2	Proposal: 2. Each TSO shall define and publish the format of the information and the technical requirements to exchange the scheduled data. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. Explanation: UPM-Kymmene Oyj supports the idea proposed by ENTSO-E in article 8 (1) but wishes to make a clarifying amendment to the proposal. To ensure the accuracy of demand-generation balance information, UPM-Kymmene Oyj proposes an amendment to rule out the possibility of TSOs to require SGUs to send scheduled data concerning hours that have not been settled yet in the day ahead market. UPM-Kymmene Oyj suggests that scheduled data is sent to TSOs only after the settlement of day ahead orders as stated as a minimum requirement in article 8 (1). This would better reflect the consumption and generation patterns that are likely to take place as consumption and generation forecasts made before day-ahead trading do not include the effect of	No	**No action. No change is proposed.** Also in article 8(2) (article 9(2) of new KORRR version) KORRR refers to technical requirement and it does not refer to TSOs and SGUs exchanges. **Clarification.** Scheduled data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with	UPM-Kymmene Oyj

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		actualized price dependent orders. This data does not take into account e.g. the demand flexibility taking place in industrial electricity consumption. The amendment would also prevent possible additional regulatory burden to industrial electricity consumption units with possibility to demand flexibility.		art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	
8	2	Proposal: 2. Each TSO shall define and publish the format of the information and the technical requirements to exchange the scheduled data with NEMOs and SGUs that are not CDSOs. Each TSO shall agree with DSOs and CDSOs the format of the information and the technical requirements to exchange the scheduled data with them. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. Explanation: 2. DSOs and TSOs shall agree on the format for data exchange between them according art 40(7) GL SO.	Yes	**Partially accepted.** Article 8(2) has been split into 2 articles (9(2) and 9(3) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
8	2	Proposal: Art 8.2 - “Each TSO shall define and publish the format of the information and the technical requirements to exchange the scheduled data, in coordination with DSOs and SGUs and submitted to NRA approval." Explanation: The format for the scheduled data that DSOs and SGUs shall provide needs to be discussed between TSOs and DSOs and SGUs, and is of utmost importance to design the IT systems accordingly. The IT systems to exchange data are very costly and an evolution of format and/or of the technical requirements requires time and would lead to additional costs for DSOs and SGUs. Therefore, it is necessary that the format and the technical requirements remains as stable as possible.	Yes	**Partially accepted.** Article 8(2) has been split into 2 articles (9(2) and 9(3) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL.	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
8	2	2. Each TSO shall define, in agreement with the DSOs, and publish the format of the information and the technical requirements to exchange the scheduled data. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. When doing so, each TSO shall take into account and complement, where necessary, the definitions provided following Article 18 of GLDPM and GLDPM v2.	Yes	**Accepted.** Article 8(2) has been split into 2 articles (9(2) and 9(3) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
8	3	3. Delete paragraph. Paragraph 3 should be deleted, as the content is already covered in Article 6 of KORRR.	Yes	**Partially accepted**. Article 8(3) refers to scheduled data and article 6 refers to structural data. However, article 8(3) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
8	3	Proposal: 3. Each TSO shall electronically store the information at least during the necessary time to comply with its tasks. Explanation: UPM-Kymmene Oyj supports the idea proposed by ENTSO-E in article 8 (1) but wishes to make a clarifying amendment to the proposal. To ensure the accuracy of demand-generation balance information, UPM-Kymmene Oyj proposes an amendment to rule out the possibility of TSOs to require SGUs to send scheduled data concerning hours that have not been settled yet in the day ahead market. UPM-Kymmene Oyj suggests that scheduled data is sent to TSOs only after the settlement of day ahead orders as stated as a minimum requirement in article 8 (1). This would better reflect the consumption and generation patterns that are likely to take place as consumption and generation forecasts made before day-ahead trading do not include the effect of actualized price dependent orders. This data does not take into account e.g. the demand flexibility taking place in industrial electricity consumption. The amendment would also prevent possible additional regulatory burden to industrial electricity consumption units with possibility to demand flexibility.	Yes	**No action**. No change is proposed in this article. However, article 8(3) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. **Clarification.** Scheduled data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of	UPM-Kymmene Oyj

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	
8	3	Proposal: DELETE 3. Each TSO shall electronically store the information at least during the necessary time to comply with its tasks. Explanation: 3. This provision should be moved to art. 6 data storage.	Yes	Partially accepted. Article 8(3) refers to scheduled data and article 6 refers to structural data. However, article 8(3) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
8	4	4. Each TSO shall communicate to the DSOs directly connected to the transmission system their planned and unplanned unavailability of network elements in the observability area of the DSOs. For planned unavailabilities, they shall agree on the necessary level of coordination and communication between them. For unplanned unavailabilities, the TSO shall communicate them as soon as practicable." For paragraph 4, if a planned unavailability of a network element in the connection points needs an action by the DSO (for example if the DSO has to do switching actions to supply a part of his system through another connection point), a communication on D-1 by the TSO to the DSO is far too late. Furthermore, it should not be only communicated but must be coordinated: such actions must be part of the operational planning of the TSO and DSO which must be aligned. Good practice in MS is that the TSO and the DSO agree that a planned outage with a certain impact must be jointly coordinated and prepared by TSO and DSO. The level of coordination and preparation depends on the impact that a planned outage at the TSO grid may have on the DSO. The agreement ensures that each party is able to plan in advance, if deemed appropriate, the necessary actions that must be undertaken to ensure the quality of supply to its grid users, or at least to reduce its negative impact on it to a reasonable level, during the unavailability. For unplanned unavailabilities, no communication can be done in advance. "	Yes	Accepted. Article 8(4) (article 9(5) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
8	4	Proposal: 4. Each TSO shall communicate to the DSOs directly connected to the transmission system their planned and unplanned unavailability of network elements in their connection point at least during day-ahead or before. Explanation: UPM-Kymmene Oyj supports the idea proposed by ENTSO-E in article 8 (1) but wishes to make a clarifying amendment to the proposal. To ensure the accuracy of demand-generation balance information, UPM-Kymmene Oyj proposes an amendment to rule out the possibility of TSOs to require SGUs to send scheduled data concerning hours that have not been settled yet in the day ahead market. UPM-Kymmene Oyj suggests that scheduled data is sent to TSOs only after the settlement of day ahead orders as stated as a minimum requirement in article 8 (1). This would better reflect the consumption and generation patterns that are likely to take place as consumption and generation forecasts made before day-ahead trading do not include the effect of actualized price dependent orders. This data does not take into account e.g. the demand flexibility taking place in industrial electricity consumption. The amendment would also prevent possible additional regulatory burden to industrial electricity consumption units with possibility to demand flexibility.	No	**No action**. No change is proposed. Also in article 8(4) (article 9(5) of new KORRR version) KORRR refers to exchanges between TSOs and DSOs and it do no refer to TSOs and SGUs exchanges. **Clarification.** Scheduled data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	UPM-Kymmene Oyj
8	4	Proposal: 4. Each TSO shall communicate to the DSOs directly connected to the transmission system their unplanned unavailability of network elements in their connection point, as soon as possible. For planned unavailability of network elements, TSO shall communicate to the DSOs at least a week in-advance. Explanation: 4. It is necessary to distinguish between planned and unplanned. For planned, the	Yes	**Partially accepted.** Article 8(4) (article 9(5) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		communication should be week before.			
3	8	Modification proposal: Art. 3.8. "Subject to the agreement of the TSO or DSO, parties required to provide data under the KORRR shall be allowed to delegate all or part of any tasks assigned to it under Regulation 2017/1485 to one or more third parties like BRP, BSP, aggregators or similar entities, in case the third party can carry out the respective function at least as effectively as the delegating entity. Justification: It has to be clarified that data can be exchanged either with TSOs or DSOs, in coherence with article 3.4. Therefore data communication with DSOs should be envisaged.	Yes	**Accepted.** Article 3(8) (article 3(9) of the new KORRR version) has been amended to consider the agreement also with DSO in case of SGUs providing directly data to the DSO	Enel
8	5	**Modification proposal** **Art. 8.5 (new)**: "Each TSO shall timely communicate to the DSOs directly connected to the transmission system the information on scheduled data related to distribution connected SGUs." Justification: As explained in the general comments, in order to guarantee reciprocity in the exchange of information, further responsibilities should be added for TSOs. In particular, TSOs should timely communicate operational data to DSOs, in order to guarantee to the maximum extent a coordinated system operation thus avoiding deterioration of security of supply or quality of service. This is of particular importance in those Member States where, based on the no-one-size-fits-all principle for data management set out in art. 3.4, it will be defined that distribution connected SGUs send their data directly to TSOs. Furthermore, as pointed out in the general comments, where data are sent by SGUs to TSOs, DSOs should timely have access to scheduled and real-time data. Furthermore, in order to guarantee security of supply, DSOs should be entrusted	No	**Not accepted.** Reciprocity between TSOs and DSOs is guaranteed by article 3(3) of the new version of the KORRR that reflects the wording and intention of Article 40(5) read in conjunction with Articles 58 to 50 and 53 of SO GL. The DSO access to the information about the Transmission system and the SGUs connected to distribution network is reflected in articles 5(2), 5(3), 6(7), 8 (3) and 9(5) of new version of the KORRR. Articles of KORRR where exchanges between DSO and TSO should be done under agreement have been amended.	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		of a systematic validation activity of dispatching orders given by TSOs when they can violate operational constraints.			
8	-	1. Each TSO shall be capable of exchanging scheduled data with SGUs, DSOs or third parties to whom the exchange of scheduled information may have been delegated. Scheduled data shall at least include the generation and load schedules resulting from market trades between Day ahead and real time, unavailability or limitations to active power production or consumption of SGUs, unavailability of network elements of DSOs in the TSO's observability area 2. Each TSO shall define, in agreement with the DSOs, and publish the format of the information and the technical requirements to exchange the scheduled data. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. When doing so, each TSO shall take into account and complement, where necessary, the definitions provided following Article 18 of GLDPM and GLDPM v2. 3. Delete paragraph. 4. Each TSO shall communicate to the DSOs directly connected to the transmission system their planned and unplanned unavailability of network elements in the observability area of the DSOs. For planned unavailabilities, they shall agree on the necessary level of coordination and communication between them. For unplanned unavailabilities, the TSO shall communicate them as soon as practicable.	1. Yes 2. Yes 3. Yes 4. Yes	1. **Accepted.** Article 8(1) (article 9(1) of new KORRR version) has been amended and the reference to NEMOs has been deleted. 2. **Accepted.** Article 8(2) has been split into 2 articles (9(2) and 9(3) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL. 3. **Accepted. A**rticle 8(3) has been deleted and a new general article related to all types of information has been added as new article 6(10) of new KORRR version. 4. **Accepted.** Article 8(4) (article 9(5) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs.	EWE Netz GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Explanation: Paragraph 1 should avoid referring to NEMOs, as NEMOs are not subject of (EU) 2017/1485 and therefore should not be subject of KORRR. Paragraph 2 should be amended to ensure the requirements defined following GLDPM and GLDPM v2 are taken into account. Defining parallel, deviating requirements for the same set of data another time is inefficient and causes unnecessary costs. The definition of the format for scheduled data should be done in agreement with the DSOs (cf. remarks above). Paragraph 3 should be deleted, as the content is already covered in Article 6 of KORRR. Paragraph 4: If a planned unavailability of a network element in the connection points needs an action by the DSO (for example if the DSO has to do switching actions to supply a part of his system through another connection point), a communication on D-1 by the TSO to the DSO is far too late. Paragraph 4 should not be limited to elements in the connection point, but should follow the approach of observability area. Of course DSOs have their own observability area with regard to the transmission system, as the TSO has with regard to the distribution system. Furthermore, it should not be only communicated but must be coordinated: such actions must be part of the operational planning of the TSO and DSO which must be aligned. In Belgium and Germany, for example, the TSO and the DSO agree that a planned outage with a certain impact must be jointly coordinated and prepared by TSO and DSO. The level of coordination and preparation depends on the impact that a planned outage at the TSO grid may have on the DSO. The agreement ensures that each party is able to plan in advance, if deemed appropriate, the necessary actions that must be undertaken to ensure the quality of supply to its grid users, or at least to reduce its negative impact on it to a reasonable level, during the unavailability. For unplanned unavailabilities, no communication can be done in advance. In paragraph 4 there is a possible misunderstanding with 'at least', which would be better replaced by 'at the latest'. Of course for unplanned unavailability no communication can be done in advance."			

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
9	0	Proposal: This sentence should be deleted: Each TSO may specify more detailed content of the real time information exchanged according to Articles 42, 44, 47, 50, 52 and 53 of Regulation 2017/1485 Explanantion: The regulation 2017/1485 specifies the scope of the data exchange. It does not say that that the TSO have the right to get more information than it is written down in the SO-GL, which is obviously the intention of article 9. Thus, the article 9 is not necessary and shall be deleted.	Yes	**Accepted. Article 9 has been deleted.**	TIWAG-Tiroler Wasserkraft AG - Dispatching
9	0	Proposal: Art.9 – "In coordination with all parties involved, Each TSO may specify more detailed content of the real-time information exchanged according to Articles 42, 44, 47, 50, 52 and 53 of Regulation 2017/1485. These additional requirements must be duly justified by TSO and submitted to NRA approval." Explanation: EDF could understand that TSOs "may specify more detailed content of the real time information exchanged". However, such additional requirements would have to be duly justified by TSOs and they should be discussed with all parties involved.	Yes	**Accepted. Article 9 has been deleted.**	EDF
9	0	KORRR cannot request for more detailed information than already specified with Regulation 2017/1485. REMOVE ARTICLE	Yes	**Accepted. Article 9 has been deleted.**	SP Energy Networks
9	0	More detailed than what? The KORRR cannot specify more detailed data than is permitted in the SOGL. Delete this Article.	Yes	**Accepted. Article 9 has been deleted.**	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
9	1	1. Each TSO may specify more details with regard to real time information exchanged according to Articles 42, 44, 47, 50, 52 and 53 of Regulation 2017/1485. With regard to Article 44, 50 and 53 of Regulation 2017/1485 the specifications of the TSO is subject to an agreement with the respective DSO according to Article 40(7) of Regulation 2017/1485. Explanation: It must be clear that only more details on the data set already defined in (EU) 2017/1485 may be provided. "Content" is ambiguous in this regard, as it is not clear to stakeholders whether that may mean additional data. Such additional data would constitute a more stringent requirement in comparison to what is laid down in (EU) 2017/1485 and therefore prohibited. Again, an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems and distribution-connected SGUs. Proposal (from line 346): Delete the following sentence: Each TSO may specify more detailed content of the real time information exchanged according to Articles 42, 44, 47, 50, 52 and 53 of Regulation 2017/1485. Explanation: The regulation 2017/1485 specifies the scope of the data exchange. It does not say that that the TSO have the right to get more information than it is written down in the SO-GL, which is obviously the intention of Article 9. Thus, the Article 9 is not necessary and shall be deleted.	Yes	**Accepted. Article 9 has been deleted.**	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG BDEW- German Association of Energy and Water Industries RWE Generation SE
9	1	This article remains very vague. Moreover, it is important to stipulate that the TSO cannot require more data than SOGL allows, as has also been discussed in the SO ESC on this topic. The scope of this article only carries on more precise clarifications of what exactly the TSO will demand (e.g. formats), but cannot carry on any additional data	Yes	**Accepted. Article 9 has been deleted.**	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
9	1	1. Each TSO may specify more details with regard to real time information exchanged according to Articles 42, 44, 47, 50, 52 and 53 of Regulation 2017/1485. With regard to Article 44, 50 and 53 of Regulation 2017/1485 the specifications of the TSO is subject to an agreement with the respective DSO according to Article 40(7) of Regulation 2017/1485. Explaination: It must be clear that only more details on the data set already defined in (EU) 2017/1485 may be provided. "Content" is ambiguous in this regard, as it is not clear to stakeholders whether that may mean additional data. Such additional data would constitute a more stringent requirement in comparison to what is laid down in (EU) 2017/1485 and therefore prohibited. Again, an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems and distribution-connected SGUs.	Yes	**Accepted. Article 9 has been deleted.**	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
10	1	Proposal: 1. The Relevant System Operator (TSO or DSO) that direclty receives the real-time data, shall specify and publish the format for real-time data exchange related to SGUs. NEW 1a. Each TSO, in agreement with the DSOs of its control area, shall specify and publish the format for real-time data exchange related to the distribution network observability area within its Control Area. Explanation: 1. For the sake of rasonability, the Relevant System Operator (TSO or DSO) that direclty receives the real-time data shall be responsible for defining the format of data exchange. 1a. DSOs and TSOs shall agree on the format for data exchange betwen them according art 40(7) GL SO.	Yes	**Partially accepted.** Article 10(1) has been reworded to split the requirements between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and TSOs or DSOs, not subject to Article 40(7) of SO GL (10(1) and 10(2) of new KORRR version).	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
10	1	1. Each TSO, in agreement with the DSOs of its control area, shall specify and publish the format for real time data exchange related to the distribution network control area and to the SGUs within its Control Area. "The change in paragraph 1 and 2 is necessary as an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems and distribution-connected SGUs. The original proposal does not take this requirements sufficiently into account. Avoid confusion between observability area and control area for the DSOs.	Yes	**Partially accepted.** Article 10(1) has been reworded to split the requirements between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL (10(1) and 10(2) of new KORRR version).	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10	1	Each TSO, in agreement with the DSOs of its control area, shall specify and publish the format for real-time data exchange related to the distribution network observability area and to the SGUs within its Control Area. Explanation: The proposed provision from Article 2 (7) of the KORRR document is incompatible with the provisions of Article 40 (7) of Commission Regulation (EU) 2017/1485 (SO GL) which call for the necessity of making agreement between OSD and TSO.	Yes	**Partially accepted.** Article 10(1) has been reworded to split (10(1) and 10(2) of new KORRR version) the requirements between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL.	PTPiREE
10	2	I miss some clarifying regarding this paragraph in SO GL 40(6), "(f) the time stamping and frequency of delivery of the data and information to be provided by DSOs and SGUs, to be used by TSOs in the different timescales. The frequency of information exchanges for real-time data, scheduled data and update of structural data shall be defined" Especially I miss a clarification of "Time stamping". Whether it for real-time data should be delivered by the actual value or if it is acceptable to set the time stamp at the arrival time? And then forward the value and time stamp to the third party if requested? Svenska Kraftnät (Swedish TSO) now gets real time values from external actors without any time stamp; do we need to require that from now on? As it is not mentioned in the KORRR is it up to Svenska Kraftnät to decide? If the values are stored and used for disturbances analysis the time stamp might be important.	No	**Clarification**: Articles 8(2) and 10(2) (articles 9(4) and 10(2) of new KORRR version) have been amended to take into account the requirement of article 40(6) (f) of SO GL related to time stamping. In those articles it is stated that each TSO shall define the technical requirements for the exchanges of scheduled and real time data. Related to define the frequency of delivery of the data in KORRR according with article 40(6)(f) of SO GL, KORRR defines a maximum refresh rate for real time data of 1 minute than may be reviewed at national level during national implementation. Additionally, the provision of real time data can be defined event-based (when there is a change). The requirement shall be defined by each TSO and/or DSO according to their needs.	Svenska Kraftnät
10	2	Proposal: Art10.2- "In coordination with all parties involved and submitted to NRA approval, Each TSO shall specify the requirements for real-time data exchange related to the distribution network observability area and to the SGUs within its Control Area". Explanation: EDF considers that TSOs' requirements should be discussed with all parties involved and approved by the NRA. The IT systems to exchange data are very	No	**Not accepted** Requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(3) of KORRR (article 1(5) of the new KORRR version) and be examined by the competent NRA. According to article 40.7, KORRR refers to the agreement	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		costly and an evolution of format and the technical requirements requires time and would lead to additional costs for DSOs and SGUs. Therefore, it is necessary that the format and the technical requirements remains stable as far as possible.		between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic.	
10	2	2. Each TSO, in agreement with the DSOs of its control area, shall specify the requirements for real-time data exchange related to the distribution network control area and to the SGUs within its Control Area. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. "The change in paragraph 1 and 2 is necessary as an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems and distribution-connected SGUs. The original proposal does not take this requirements sufficiently into account. Avoid confusion between observability area and control area for the DSOs.	Yes	**Partially accepted.** Article 10(2)(article 10(2) of new KORRR version) has been reworded to split the requirements between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL (10(1) and 10(2) of new KORRR version).	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
10	3	Define: Logical connection in paragraph 3.	No	**Clarification.** The definition of logical connection will be added to the supporting document	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
10	3	Article 10(3) - where will these all TSO practices be specified? In the KORRR or will they separately be developed? These should be subject to public consultation especially if they drive costs onto other parties who are required to comply with them	No	**Clarification.** All TSO practices will be defined and published at ENTSO-E level, so unified at European level, and refer to the exchange of information among TSOs not with other parties.	SP Energy Networks
10	4	Clarification: It is not clear why the TSO shall define the refresh rate instead of directly specifying it in the KORRR proposal. Any option of differentiating between several control areas should be avoided.	No	**Clarification**. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data. Requirements of refresh rates defined in KORRR refer to the data provided by the SGUs when they do not provide services to the System. Requirements may be in each country so KORRR set a maximum threshold that can be adjusted by each TSO at national level.	TIWAG-Tiroler Wasserkraft AG - Dispatching

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10	4	Proposal: 4. Each TSO shall define the refresh rate for the real time data exchanges in its control area. It shall not be longer than 1 minute. Explanation: 4. It should be deleted, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange related to load-frequency control is out of the scope of Title II and therefore not be part of KORRR.	Yes	**Accepted.** Article 10(4) (article 10(5) of new KORRR version) has been reworded to consider national flexibility for defining requirements for service provision to the System. Every active power injection or consumption is related to the load-frequency control: when the provision of data is related to service, it shall be subject to those national requirements; when the provision of data is not related to a service, it shall be subjected to the KORRR.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
10	4	Proposal: Art.10.4 – Delete this paragraph Explanation: EDF believes data related to automatic load-frequency control processes should be defined in the certification criteria for load-frequency. Moreover, as previously mentioned, EDF believes that these KORRR should be less prescriptive and not set out a timeframe of one minute. Therefore, EDF considers that this paragraph should be deleted.	Yes	**Not accepted.** Article 40(6)(f) of SO GL requires the KORRR to define the frequency of delivery of the data. In this sense, KORRR defines a maximum refresh rate for real time data of 1 minute than may be reviewed at national level during national implementation. Additionally, the provision of real time data can be defined event-based (when there is a change). The requirement shall be defined by each TSO and/or DSO according to their needs. Current status of SCADA systems allows exchange of real time data with a refresh rate of 1 minute. However, article 10(4) (article 10(5) of new KORRR version) has been reworded to consider national flexibility for defining requirements for service provision to the System. Every active power injection or consumption is related to the load-frequency control: when the provision of data is related to service, it shall be subjected to those national requirements; when the provision of data is not related to a services, it shall be subjected to the KORRR.	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10	4	Article 10 (4) - clarification It is not clear why the TSO shall define the refresh rate instead of directly specifying it in the KORRR proposal. Any option of differentiating between several control areas should be avoided.	No	**Clarification**. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of of the data. Requirements of refresh rates defined in KORRR refer to the data provided by the SGUs when they do not provide services to the System. Requirements may be in each country so KORRR set a maximum threshold that can be adjusted by each TSO at national level.	BDEW- German Association of Energy and Water Industries RWE Generation SE
10	4	4. Each TSO shall define the refresh rate for the real time data exchanges in its control area. It shall not be longer than 1 minute. " The last sentence of paragraph 4 should be deleted, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange related to load-frequency control is not subject of Title II and therefore not be part of KORRR. "	Yes	**Accepted.** Article 10(4) (article 10(5) of new KORRR version has been reworded to consider national flexibility for defining requirements for service provision to the System. Every active power injection or consumption is related to the load-frequency control: when the provision of data is related to service, it shall be subjected to those national requirements; when the provision of data is not related to a services, it shall be subjected to the KORRR	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
10	4	IFIEC finds the definition of real time data as "no longer than 1 minute" quite strict, as this will lead to not only enormous amounts of data that will need to be transferred (with corresponding costs for all the SGU, including those demand facilities that want to deliver DSR services to system operators, creating a new barrier for participation) but that it is also still very unclear what the TSOs will actually do with these billions (!) of data points that they will receive every year.	No	**Not accepted.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data. In this sense, KORRR defines a maximum refresh rate for real time data of 1 minute than may be reviewed at national level during national implementation. Additionally, the provision of real time data can be defined event-based (when there is a change). The requirement shall be defined by each TSO and/or DSO according to their needs. Current status of SCADA systems allows exchange of real time data with a refresh rate of 1 minute.	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10		1) The actual version of the KORRR sets the framework for data exchange models that are unilaterally decided by the TSO. This does not guarantee that those models are the overall most efficient ones. For example: • On various occasions, the KORRR mandates the TSO to define data exchange specifications. The KORRR does not require that the TSO agrees with the involved parties, motivates his needs or considers issues of technical feasibility or costs that is incurred by other parties because of these specifications. This is – in the relation TSO-DSO - for example the case in art 10.4, art 13.2 and art 14.2, where the wording "defined by the TSO" (or similar) is used to describe the data exchange processes, the necessary resolution, redundancy, protocols … that the DSO must comply with or must use. In summary, given the unilateral decision power that is attributed to the TSO, the duty of the TSO's counterparties to bear the costs to invest in data systems that respond to the TSOs specifications, and the absence – or at least lack of clarity – of regulatory aspects, we conclude that the KORRR leaves a lot of decision power to the TSO without ensuring that the TSO seeks for the best data exchange solution, considering the overall efficiency and overall cost. We especially regret the unequilibrium that this KORRR would establish in the relation TSO – DSO. This contradicts numerous position papers, amongst others the joint position paper by ENTSO-E and the DSO associations , where collaboration between TSO and DSO – considered as equal partners - is identified as a necessary condition for secure and efficient system management and market facilitation.	No	Clarification. KORRR does not impose neither the DSOs nor the SGUs the use of a specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data to prepare that model. Related to the comment on article 10(4) (article 10(5) of new KORRK version): Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data. Requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic. Related to position papers: KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	Belgian DSOs: Eandis, Infrax, Ores, Resa and Sibelga

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10	-	1. Each TSO, in agreement with the DSOs of its control area, shall specify and publish the format for real time data exchange related to the distribution network control area and to the SGUs within its Control Area. 2. Each TSO, in agreement with the DSOs of its control area, shall specify the requirements for real-time data exchange related to the distribution network control area and to the SGUs within its Control Area. The technical requirements should where possible, be in accordance with an international standard recommended by all TSOs and with current technologies to guarantee security, confidentiality and redundancy of the communications. 3. No Change. 4. Each TSO shall define the refresh rate for the real time data exchanges in its control area. It shall not be longer than 1 minute. Explanation: The change in paragraph 1 and 2 is necessary as an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems and distribution-connected SGUs. The original proposal does not take this requirements sufficiently into account. Avoid confusion between observability area and control area for the DSOs. The last sentence of paragraph 4 should be deleted, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange related to load-frequency control is not subject of Title II and therefore not be part of KORRR. Define: Logical connection in paragraph 3.	1. Yes 2. No 3. No 4. Yes	1. **Accepted.** Article 10(1) has been reworded to split the requirements between to TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL (10 (1) and 10 (2) of new KORRR version). 2. **Not accepted.** Requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic. 3. **Clarification.** The definition of logical connection will be added to the supporting document 4. **Accepted.** Article 10(4) (article 10(5) of new KORRR version has been reworded to consider national flexibility for defining requirements for service provision to the System. Every active power injection or consumption is related to the load-frequency control: when the provision of data is related to service, it shall be subjected to those national requirements; when the provision of data is not related to a services, it shall be subjected to the KORRR.	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
10	2, 4	Article 10(2) and 10(4) This for individual TSO to agree with DSOs and SGUs to together - not be imposed by the TSO. REMOVE CLAUSES	2. No 4. No	2. **Not accepted.** Requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. 4. **Not accepted.** Article 40(6)(f) of SO GL requires the KORRR to define the frequency of delivery of the data. In this sense, KORRR defines a maximum refresh rate for real time data of 1 minute than may be reviewed at national level during national implementation. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic.	SP Energy Networks
11	0	This article is completely redundant; it only repeats the SOGL and adds no value. Delete this Article.	Yes	**Accepted. Article 11 has been deleted.**	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
11	0	Delete this article completely. Explaination: Article 11 should be deleted, as it provides no added value to the provisions already provided in (EU) 2017/1485. In fact the question arises whether the current version of the article requires DSOs to exchange all data described in article 43 of (EU) 2017/1485. That shows this article in its current version is a source of legal uncertainty. To avoid this legal uncertainty, it should be deleted.	Yes	**Accepted. Article 11 has been deleted.**	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
11	1	REMOVE ARTICLE - it is merely a restatement of Regulation 2017/1485 Article 43 and does not add value to this document.	Yes	**Accepted. Article 11 has been deleted.**	SP Energy Networks
11	-	Delete this article completely. Explanation: Article 11 should be deleted, as it provides no added value to the provisions already provided in (EU) 2017/1485. In fact the question arises whether the current version of the article requires DSOs to exchange all data described in article 43 of (EU) 2017/1485. That shows this article in its current version is a source of legal uncertainty. To avoid this legal uncertainty, it should be deleted.	Yes	**Accepted. Article 11 has been deleted.**	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
12	1	REMOVE ARTICLE 12(1)(a) to (c) - this documents is meant to be about Key Roles, responsibilities and requirements and the information here is meant to be agreed between individual TSOs and their DSOs	Yes	**Partially accepted.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 12(1) of KORRR (article 11(1) of new KORRR version) set a minimum threshold for updating information that can be adjusted by each TSO at national level during national implementation. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them, so wording of article 12(1) (article 11(1) of new KORRR version) has been amended to improve clarity regarding this topic.	SP Energy Networks
12	1	Art 12(1)(a) to (c) It is for each individual TSO to agree these timing requirements with its own affected DSOs. If it was important for the data to follow a particular time line that would be in the SOGL. It is not appropriate to put these requirements in a document that purports to be about organizational arrangements.	Yes	**Accepted**. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 12(1) of KORRR (article 11(1) of new KORRR version) set a minimum threshold for updating information that can be adjusted by each TSO	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				at national level during national implementation. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them, so wording of article 12(1) (article 11(1) of new KORRR version) has been amended to improve clarity regarding this topic.	
12	1	Article 12 -1 a, b & c imposes obligations in addition to those defined in SOGL. This is out of the scope of the KORRR and these additional requirements should be deleted.	No	Not Accepted. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 12(1) of KORRR (article 11(1) of new KORRR version) set a minimum threshold for updating information that can be adjusted by each TSO at national level during national implementation. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them, so wording of article 12(1) (article 11(1) of new KORRR version) has been amended to improve clarity regarding this topic.	Northern Powergrid
12	1	"1. Each DSO shall review the DSO asset structural information it shares with the TSOs of its control area at least every 6 months and in agreement between the TSO and DSO, the DSO may provide updated information to the TSO in the following situations: a) At least 3 months before planned commissioning of a new network element or facility. If agreed with the DSO, the TSO may define a different timeline; b) At least 3 months before planned final removal from service of the network element or facility. If agreed with the DSO, the TSO may define a different	Yes	Partially accepted. Article 12(1) of KORRR (article 11(1) of new KORRR version) set a minimum threshold for updating information that can be adjusted by each TSO at national level during national implementation. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE, EWE NETZ GmbH innogy SE SWM Infrastruktur

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		timeline; c) At least 3 months before planned significant modifications in the network element or facility. If agreed with the DSO, the TSO may define a different timeline; d) As soon as practicable in case there is a change in the Observability Area; e) As soon as practicable if an error is detected in the structural data." Explaination: "The original version of this article goes beyond the framework given by (EU) 2017/1485, it is more stringent, which is prohibited. There is a clear update cycle of 6 months foreseen in Article 43(4) of (EU) 2017/1485. The provision of an update cycle of 3 months as foressen by TSOs is more stringent. TSOs are not entitled to define more stringent requirements. Furthermore, (EU) 2017/1485 does not provide for the exchange of data of new network elements of distribution system (cf. Article 43 of (EU) 2017/1485). Of course this can be agreed bilaterally. The whole content of Article 12 of KORRR is subject to an agreement between TSO and DSO stemming from Article 40(7) of (EU) 2017/1485. This precondition of an agreement should be clearly stated in KORRR. Additionally, use of the phrase ""in agreement between the TSO and DSO"" gives the DSO a chance to formally acknowledge what is required by the TSO and to be compliant. Use of the phrase ""DSO Asset"" brings specificity to the information being exchanged; that it will be asset data that is exchanged. Use of the word “planned” brings specificity to the situations described. It could be interpreted that the DSO is non-compliant if it did not inform the TSO of an unplanned event even if it had no prior knowledge of the event – this is not practical. We must take account of this situation. We suggest the same for TSOs and SGUs in this document so that they also have equal chance of being as compliant as possible. Use of the word “practicable” allows for an unplanned change in the observability area or for practical feedback if there is an error."		processes to exchange data between them, so wording of article 12(1) (article 11(1) of new KORRR version) has been amended to improve clarity regarding this topic. Also the article has been amended to introduce some of the changes proposed in points from a) to e) and amend the reference to 3 months	GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
12	1	With respect to significant modifications, it is important to add that the timing of such modifications can be adapted during the on-going work. This should also be reflected in this article. Moreover, the article should also foresee a bullet for unforeseen events (e.g. accident, explosion, ...) which would change the structural data from the site but which cannot by there nature be communicated at least three months in advance (and which are not covered by point e on errors, as these relate to data errors)	Yes	**Partially accepted.** Article 12(1) (article 11(1) of new KORRR version) has been reworded to take into account first part of the comment as second part is related to SGU chapter. This is why a new point 15(1) (e) in the new KORRR version was added to reflect second part of the comments related to the situation of unforeseen modifications.	IFIEC Europe
12	1d	Definition of error needed: What does "error" mean in paragraph 1 (d)? Does it mean an error in the data set transmitted earlier or does it mean a malfunction of the SGU?	Yes	**Accepted.** Article 12(1) (article 11(1) of new KORRR version) has been amended to clarify that “error” means an error in the data set transmitted earlier	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
13	1	Proposal: 1.All DSOs within the observability area and the control area of the TSO shall provide their planned unavailability of network elements to the TSO, at least in D-2 and day-ahead, and as soon as possible for unplanned. Transmission connected DSOs shall provide the data directly to the TSO. Non-transmission connected DSOs may provide the data directly to the TSO or through its connecting DSO according to Article 3(4). Explanation: 1. D-2 is not an "unplanned period of time".	Yes	**Accepted.** Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
13	1	Article 13-1 imposes a new requirement to share planned and unplanned unavailability of network elements in particular timescales. This is out of the scope of the KORRR and these additional requirements should be deleted.	No	**Clarification.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of scheduled data. Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation	Northern Powergrid

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				timeframes.	
13	1	"1. Transmission connected DSOs shall provide data directly to the TSO. In general, non-transmission connected DSOs shall provide data through their connecting DSO. In agreement between TSO and transmission-connected DSO, non-transmission connected DSOs may provide the data directly to the TSO. 2. TSOs shall provide the scheduled data regarding power schedules of distribution-connected SGUs to each DSO or CDSO, in case these schedules are not yet available to DSO or CDSO through the cascaded data exchange. TSOs, DSOs and CDSOs shall agree on requirements to exchange scheduled data. 3. DSOs shall have the right but not the obligation to represent the data related to distribution-connected SGUs connected to its system as injections and withdrawals at each node at the border of TSO's individual grid model referred to in Article 64 of (EU) 2017/1485. " Explaination: "Sentence 1 of paragraph 1 should be deleted, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange related to D-2 and day-ahead schedules of distribution systems is not subject of Title II. TSOs are therefore not entitled to define anything with regard to that in KORRR. Paragraph 1 should define cascaded data exchange as the general principle for data exchange regarding non-transmission connected DSOs connected to transmission-connected distribution systems. This general rule was agreed in the data management final report of the TSO-DSO-platform (page 16 of the final report:""Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.)."" Subject to an agreement between TSO and transmission-connected DSO (as required in Article 40(7) of (EU) 2017/1485), deviating solutions might be agreed bilaterally. Paragraph 2 Sentence 1 should foresee a provision of data from TSO to DSO instead of defining only the right to request for DSOs. TSOs are obliged to provide schedules of distribution-connected SGUs to DSOs to fulfill their obligations from 72/EC/2009, art. 12 e):""Each transmission system operator shall be responsible for:(e)providing to the operator of any other system with which its system is	No	**Not accepted.** Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes. Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Data exchanges and formats between the DSO and the TSO should be agreed according to article 40.7. Wording of some articles has been amended to improve clarity regarding this topic. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. Related to position papers: KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE, EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		interconnected sufficient information to ensure the secure and efficient operation, coordinated development and interoperability of the interconnected system;"" Data related to schedules of SGUs at the distribution system is unquestionably necessary to ensure the secure and efficient operation, coordinated development and interoperability of the (distribution) system by putting the DSO in a position to do its operational planning. Paragraph 2 sentence 2 must foresee an agreement between TSO and DSO (and CDSO) on requirements with regard to data exchange as an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems. Article 13 should be extended by the right of DSOs to aggregate data of distribution-connected SGUs connected to their system as injections and withdrawals at each node at the border of the TSO's individual grid model. TSOs are obliged to represent the information obtained following Article 40(3) of (EU) 2017/1485 into injections and withdrawals of their individual grid model, as provided in Article 40(4) of (EU) 2017/1485. For the sake of efficiency and to avoid unnecessary data transfer and processing, this task should be carried out by DSOs before providing detailed data to the TSO. That means, the additional paragraph is necessary to make sure fundamental principles of European Union law are respected, i.e.: the principle of proportionality (Article 5(4) of the Treaty on European Union) and the principle of data scarcity (e.g. laid down in article 6(1) of (EU) 2016/679)."			
13,14	1	Art 13(1) We are not aware of any SOGL obligation to meet these requirements; ie D-2 and day ahead. Where is this in SOGL? Art 13(1) It needs to be made clear that it is only the TSO in whose area the DSO is who will receive DSO data directly. suggest: Each DSO shall provide to its the TSO in whose control area it is connected, the Real Time data from the observability area defined by the TSO according to Articles 43(1) and 43(2) of Regulation 2017/1485.	1.Yes 2. No	**1.-Clarification.** Timeframes considered in article 13(1) (article 12(1) of new KORRR version) are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes. However, this article has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. **2. Partially accepted.** Unless reference to 13(1) it is not correct as it refers to article 14(1). Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. In that article the data provision is related to observability area of the TSO.	
13	1	**Modification proposal** Art. 13.1: "all DSOs within the observability area and the control area of the TSO shall provide their planned unavailability of network elements to the TSO, at least in D-2 and day-ahead". Justification: We point out that, due to the unforeseeable nature of unplanned interruptions, this wording is not applicable, since it requires DSOs to provide unplanned unavailability to the TSO in D-2 or day-ahead, where by definition this information is not known yet. **We propose to remove the unplanned unavailabilities from paragraph 13.1.** Unplanned unavailabilities could however be still exchanged in the context of real time information exchange.	Yes	**Partially accepted.** Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	Enel
13	1	All DSOs within the observability area and the control area of the TSO shall provide their planned, at least in D-2 and day-ahead, and unplanned unavailability of network elements to the TSO. The wording did not make sense, as it is impossible to provide unplanned unavailability to the TSO in D-2 or day ahead. For the latter, when should this information be communicated?	Yes	**Partially accepted.** Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	IFIEC Europe
13	2	Proposal: 2. Each DSO or CDSO shall receive the scheduled data regarding power schedules of SGUs connected to its network. DSOs and CDSOs shall comply with the requirements agreed with the relevant TSO to exchange scheduled data.	Yes	**Partially accepted.** Current wording of KORRR already allows DSOs and CDSOs to define the data they need to perform their tasks and receive it. Proposed wording would obly them	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Explanation: 2. According to 72/EC/2009, art. 12 e):"Each transmission system operator shall be responsible for:(e)providing to the operator of any other system with which its system is interconnected sufficient information to ensure the secure and efficient operation, coordinated development and interoperability of the interconnected system;" Data related to schedules of SGUs at the distribution system is unquestionably necessary to ensure the secure and efficient operation, coordinated development and interoperability of the (distribution) system by putting the DSO in a position to do its operational planning. Moreover, it must foresee an agreement between TSO and DSO (and CDSO) on requirements with regard to data exchange as an agreement between TSO and DSO is foreseen in Article 40(7) of (EU) 2017/1485 for all data related to distribution systems.		to receive the data even in the case they do not need it. Article 12(e) of directive 2009/72 refer to other TSOs as it is referring to "interconnected system."	
13	2	Article 13(2) in which Regulation /Article are the D-2 and day ahead requirements placed on DSOs. Do not appear to be in regulation 2017/1485	No	Clarification unless reference it is not correct. In article 13(1) (article 12(1) of new KORRR version) timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	SP Energy Networks
13	2	1) The actual version of the KORRR sets the framework for data exchange models that are unilaterally decided by the TSO. This does not guarantee that those models are the overall most efficient ones. For example: • On various occasions, the KORRR mandates the TSO to define data exchange specifications. The KORRR does not require that the TSO agrees with the involved parties, motivates his needs or considers issues of technical feasibility or costs that is incurred by other parties because of these specifications. This is – in the relation TSO-DSO - for example the case in art 10.4, art 13.2 and art 14.2, where the wording “defined by the TSO” (or similar) is used to describe the data exchange processes, the necessary resolution, redundancy, protocols … that the DSO must comply with or must use. In summary, given the unilateral decision power that is attributed to the TSO, the duty of the TSO’s counterparties to bear the costs to invest in data systems that respond to the TSOs specifications, and the absence – or at least lack of clarity – of regulatory aspects, we conclude that the KORRR leaves a lot of decision power	No	Clarification. KORRR does not impose neither the DSOs nor the SGUs the use of an specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data to prepare that model. Related to the comment on article 13(2) (article 12(2) of new KORRK version): Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 13 (2) (article 12(2) of new KORRRR version) we refer to requirements,	Belgian DSOs: Eandis, Infrax, Sibelga, ORES, Resa

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		to the TSO without ensuring that the TSO seeks for the best data exchange solution, considering the overall efficiency and overall cost. We especially regret the unequilibrium that this KORRR would establish in the relation TSO – DSO. This contradicts numerous position papers, amongst others the joint position paper by ENTSO-E and the DSO associations , where collaboration between TSO and DSO – considered as equal partners - is identified as a necessary condition for secure and efficient system management and market facilitation.		and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic. Related to position papers: KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	
13	-	It is not clear how any unplanned unavailability could be provided before it occurs... Data only can be provided as soon as possible after a unplanned unavailability occured!	Yes	Accepted. Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate between planned and unplanned outages and to better define the level of coordination between TSO and DSOs.	RWE Generation SE
13	-	Article 13 - clarification The DSO shall provide unplanned and planned unavailabilitiesy of network elements d-2 and day-ahead. By the SO-GL the DSO are not obliged to provide these data. The TSOs are consequently not entitled to include additional data exchanges in the KORRR proposal. It is to specify that planned date have to be provided d-2. Unplanned events shall be provided as soon as possible.	Yes	Clarification. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the scheduled data. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes. Article 13(1) (article 12(1) of new KORRR version) has been reworded to differentiate	EnBW Energie Baden-Württemberg AG BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				between planned and unplanned outages and to better define the level of coordination between TSO and DSOs. Timeframes considered are Day-Ahead and 2 days-ahead in accordance with CACM capacity calculation timeframes.	
14	1	Article 14 - reword to reflect that these need to be agreed by the TSOs with the relevant DSOs not imposed.	Yes	**Partially accepted.** Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. Article 44 of SO GL is under article 40(5) of SO GL so agreement between TSO and DSOs hasn´t has to be reflect in article 14(1) (article 13(1) of new KORRR version)	SP Energy Networks
14	1,2	Art 14(1) It needs to be made clear that it is only the TSO in whose area the DSO is who will receive DSO data directly. Suggest: Each DSO shall provide to its the TSO in whose control area it is connected, the Real Time data from the observability area defined by the TSO according to Articles 43(1) and 43(2) of Regulation 2017/1485. Art 14(2) These are to be agreed with the DSO (SOGL Art 40.7), not simply defined by the TSO.	1.Yes 2. No	1. **Partially accepted.** Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. In that article the data provision is related to observability area of the TSO. Article 44 of SO GL is under article 40(5) of SO GL so agreement between TSO and DSOs hasn´t has to be reflect in article 14(1) (article 13(1) of new KORRR version) 2. **Not accepted.** Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	
14	1, 2	Article 14–1 imposes a requirement for the DSO to provide real time data to the TSO, whereas Article 44 of the SOGL provides flexibility for the TSO to agree where real time data is required. Reference is made to Article 43 rather than 44. o Article 14–2 requires permits the TSO do define the requirements that should be fulfilled; these should the subject of agreement between the DSO and TSO	1.Yes 2. No	1. **Partially accepted.** Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. Article 44 of SO GL is under article 40(5) of SO GL so agreement between TSO and DSOs hasn´t has to be reflect in article 14(1) (article 13(1) of new KORRR version) 2. **Not accepted.** Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	Northern Powergrid

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
14	1,2	1. Subject to an agreement between TSO and DSO, DSOs shall provide real-time data according to Article 44 of Regulation 2017/1485 to the TSO. Paragraph 1 and paragraph 2 should provide for an agreement between TSO and DSO, as stipulated in Article 40(7) of (EU) 2017/1485. Furthermore, real-time data exchange is described in Article 44 of (EU) 2017/1485, the original reference is wrong.	1.Yes 2. No	1. **Partially accepted.** Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. Article 44 of SO GL is under article 40(5) of SO GL so agreement between TSO and DSOs hasn´t has to be reflect in article 14(1) (article 13(1) of new KORRR version) 2. **Not accepted.** Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
14	2	Proposal: DELETE 2. Each DSO shall fulfil the requirements defined by the TSO in terms of: ◦ a) Logical connections between parties and protocols used; ◦ b) Network Architecture including redundancy; ◦ c) Network security rules; ◦ d) ID and/or naming convention and data quality; ◦ e) Data Transmission Parameters and performance; ◦ f) Rules of conduct in the case of planned outages and disturbances of communication equipment. Explanation: 2. Out of scope of KORRR. According to art. 40(7) this must be agreed with DSOs.	No	**Not accepted**. Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
14	2	Article 14(2) wording should be consistent with Article 10(3) i.e. use of 'current all TSO practices'	No	**Clarification:** TSO practices will be defined and published at ENTSO-E level so unified at European level. They refer to the exchange of information among TSOs not with other parties, this is why it is only reflect in article 10 (3) (article 10 (4) of new KORRR version). In article 14(2) (article 15(1) of new KORRR version) KORRR refers to real time data provided by SGUs, so to give flexibility to the national implementation it wasn´t include the reference to "current all TSOs practices" in that article, but it will be also possible to implement those practices agreed between TSOs if it is possible.	SP Energy Networks
14	2	2. TSO and DSO shall agree on requirements in terms of: a) Logical connections between parties and protocols used; b) Network Architecture including redundancy; c) Network security rules; d) ID and/or naming convention and data quality; e) Data Transmission Parameters and performance; f) Rules of conduct in the case of planned outages and disturbances of communication equipment."	No	**Not accepted**. Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
14	2	Point f introduces "rules of conduct". For IFIEC, it is unclear which rules of conduct are meant here and who will introduce tem and approve them.	No	**Clarification.** The definition of rules of conduct will be added to the supporting document	IFIEC Europe
14	2	1) The actual version of the KORRR sets the framework for data exchange models that are unilaterally decided by the TSO. This does not guarantee that those models are the overall most efficient ones. For example: • On various occasions, the KORRR mandates the TSO to define data exchange specifications. The KORRR does not require that the TSO agrees with the involved	No	**Clarification**. KORRR does not impose neither the DSOs nor the SGUs the use of a specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data to prepare that model. Related to the comment on article 14(2)	Belgian DSOs: Eandis, Infrax, Sibelga, ORES, Resa

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		parties, motivates his needs or considers issues of technical feasibility or costs that is incurred by other parties because of these specifications. This is – in the relation TSO-DSO - for example the case in art 10.4, art 13.2 and art 14.2, where the wording "defined by the TSO" (or similar) is used to describe the data exchange processes, the necessary resolution, redundancy, protocols … that the DSO must comply with or must use. In summary, given the unilateral decision power that is attributed to the TSO, the duty of the TSO's counterparties to bear the costs to invest in data systems that respond to the TSOs specifications, and the absence – or at least lack of clarity – of regulatory aspects, we conclude that the KORRR leaves a lot of decision power to the TSO without ensuring that the TSO seeks for the best data exchange solution, considering the overall efficiency and overall cost. We especially regret the unequilibrium that this KORRR would establish in the relation TSO – DSO. This contradicts numerous position papers, amongst others the joint position paper by ENTSO-E and the DSO associations , where collaboration between TSO and DSO – considered as equal partners - is identified as a necessary condition for secure and efficient system management and market facilitation.		(article 13(2) of new KORRK version): Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. According to article 40.7, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them. Wording of some articles has been amended to improve clarity regarding this topic. Related to position papers: KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level.	
14	2	"Each DSO shall fulfil the requirements defined by the TSO in terms of:" should be changed to "Each DSO shall fulfil the requirements commonly defined and agreed with the TSO in terms of:"	No	Not accepted. Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article	RWE Generation SE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	
14	1,2	1. Subject to an agreement between TSO and DSO, DSOs shall provide real-time data according to Article 44 of Regulation 2017/1485 to the TSO. 2. TSO and DSO shall agree on requirements in terms of: a) Logical connections between parties and protocols used; b) Network Architecture including redundancy; c) Network security rules; d) ID and/or naming convention and data quality; e) Data Transmission Parameters and performance; f) Rules of conduct in the case of planned outages and disturbances of communication equipment. Explanation: Paragraph 1 and paragraph 2 should provide for an agreement between TSO and DSO, as stipulated in Article 40(7) of (EU) 2017/1485. Furthermore, real-time data exchange is described in Article 44 of (EU) 2017/1485, the original reference is wrong. Explain: Logical Connections	1.Yes 2. No	1. **Partially accepted.** Article 14(1) (article 13(1) of new KORRR version) has been amended as the reference to articles 43(1) and 43(2) of SOGL wasn´t correct, those articles of SO GL are for structural data. The correct one, related to real time data, is article 44 of SOGL. Article 44 of SO GL is under article 40(5) of SO GL so agreement between TSO and DSOs hasn´t has to be reflect in article 14(1) (article 13(1) of new KORRR version) 2. **Not accepted.** Article 40(6) of SO GL requires the KORRR to define the requirements, roles and responsibilities in relation with data exchange. Those data exchanges and formats between the DSO and the TSO should be agreed but in the case of article 14 (2) (article 13(2) of new KORRRR version) we refer to requirements, and those requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. **Clarification.** The definition of logical connection will be added to the supporting document	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
15	1	Proposal: Each SGU connected to the transmission system shall provide to its TSO the updated structural data according to Article 45, 52(1) of Regulation 2017/1485 of the facility operated by them in the format agreed with its TSO. Explanation: In countries with more than one TSO, it seems not to be cost efficient to apply new formats or to use different format for each control area. We propose a common (European) format which at least is used by the neighbouring TSOs. For expense and cost reasons in particular, different datasets in different data formats to different TSOs.	No	**Not accepted**. formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). Formats and requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	TIWAG-Tiroler Wasserkraft AG - Dispatching
15	1	Proposition: "1. Each SGU connected to the transmission system shall provide to its TSO the updated structural data according to Article 45, 52(1) of Regulation 2017/1485 of the facility operated by them in the format specified by its TSO, in coordination with SGUs Explanation: In order to be consistent with article 6.3, EDF considers the format needs to be discussed with SGUs.	No	**Not accepted**. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). **Clarification.** Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	EDF
15	2	Proposal: 2. Generally, each SGU connected to the distribution system shall provide the data to the DSO, according to Article 3(4), the updated structural data according to Article 48 and 53 of Regulation 2017/1485 of the facility operated by them in the format agreed between its DSO and TSO. Explanation: 2. To reflect the suggested wording for art. 3(4) of KORRR.	No	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 15 (2) of KORRR (article 14(2) of the new KORRR version) as it is written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." KORRR cannot be given preference to only one way to provide the data as it is reflected in the new proposal.	
15	2	Proposal: 2. Each SGU connected to the distribution system shall provide to the TSO or DSO, according to Article 3(4), the updated structural data according to Article 48 and 53 of Regulation 2017/1485 of the facility operated by them in the format specified by its TSO, in coordination with SGUs". Explanation: In order to be consistent with article 6.3, EDF considers the format needs to be discussed with SGUs.	No	Not accepted. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). Clarification. Article 6(3) has been split into 2 articles (7(1) and 7(2) of new KORRR version) to differentiate data exchange between the TSOs and the DSOs, subject to Article 40(7) of SO GL and between SGUs and System Operators, not subject to Article 40(7) of SO GL	EDF
15	2	2. Generally, each SGU connected to the distribution system shall provide the data to the DSO, according to Article 3(4), the updated structural data according to Article 48 and 53 of Regulation 2017/1485 of the facility operated by them in the format agreed between its DSO and TSO." Explainat ion: Paragraph 2 should define cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the data management final report of the TSO-DSO-platform (page 16 of the final report: "Generally, each system operator should be	No	Not accepted. Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 15 (2) of KORRR (article 14(2) of the new KORRR version) as it is written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) "each TSO, in coordination with the DSOs in its Control Area, shall define whether	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]". Additionally, paragraph 2 should provide for an agreement between TSO and DSO on data format etc., as agreement is required by article 40(7) of (EC) 2017/1485 for all data exchanges related to distribution systems.		the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." Related to agreement: Only formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, as formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). Related TSO-DSO data management report a clarification should be done. KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level. KORRR cannot be given preference to only one way to provide the data as it is stated in the explanation of the comment.	
15	2	Article 15 (2) - reword or remove - needs to reflect that format is to be agrred by TSOs and relevant DSOs as per Regulation 2017/1485 Article 40(7).	No	**Not accepted**. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				formats for the data exchange between TSOs and SGUs are not subject to article 40 (7).	
15	2	Art 15(2) The formats are for agreement, not to be defined by the TSO in isolation (SOGL Art 40.7),.	No	Not accepted. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7).	Energy Networks Association
15	1, 2	Change to: 1. Each SGU connected to the transmission system shall provide to its TSO the updated structural data according to Article 45, 52(1) of Regulation 2017/1485 of the facility operated by them in the format agreed with its TSO. 2. Each SGU connected to the distribution system shall provide to the TSO or DSO, according to Article 3(4), the updated structural data according to Article 48 and 53 of Regulation 2017/1485 of the facility operated by them in the format agreed with its TSO. Explanation: In countries with more than one TSO, it seems not to be cost efficient to apply new formats or to use different format for each control area. BDEW proposes a common (European) format which at least is used by the neighbouring TSOs. For expense and cost reasons in particular, it is not reasonable for internationally operating utilities to send the same or possibly even different datasets in different data formats to different TSOs.	No	Not accepted. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). Formats and requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level.	RWE Generation SE BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
15	1, 2	1. No change. 2. Generally, each SGU connected to the distribution system shall provide the data to the DSO, according to Article 3(4), the updated structural data according to Article 48 and 53 of Regulation 2017/1485 of the facility operated by them in the format agreed between its DSO and TSO. Explanation: Paragraph 2 should define cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the data management final report of the TSO-DSO-platform (page 16 of the final report: "Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]". Additionally, paragraph 2 should provide for an agreement between TSO and DSO on data format etc., as agreement is required by article 40(7) of (EC) 2017/1485 for all data exchanges related to distribution systems.	1. No 2. No	1. **No action** 2. **Not accepted**. Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, but formats for the data exchange between TSOs and SGUs are not subject to article 40 (7). .	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
16	1	Proposal: Each SGU shall review the structural information it shares with the TSOs of its control area at least every 12 months and provide updated information to the TSO and DSO in the following situations: ... Explanation: There is no reason why the SGUs are obliged to review their structural data every six month. According to the letters a) to d) the important changes in structural data have to be provided within three month anyway. This is an unfounded requirement and shall be adapted to the existing process.	Yes	**Not accepted**, Article 16(1) of KORRR (article 15(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO. The proposal is neither in accordance with SOGL or GLDPM. However, to clarify the article, it has been amended to unify the reference to 6 months instead of the reference to 3 months	TIWAG-Tiroler Wasserkraft AG - Dispatching
16	1	Proposal: “Each SGU shall review the structural information it shares with the TSOs of its control area and provide updated information to the TSO or DSO in the following situations”. Explanation: A systematic review of the structural information at least every 6 month is too frequent, given that significant changes have already to be communicated within 3 months to TSOs or DSOs.	Yes	**Not accepted**, Article 16(1) of KORRR (article 15(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO. However, to clarify the article, it has been amended to unify the reference to 6 months instead of the reference to 3 months	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
16	1	1. Each SGU shall review the structural information it shares with the TSOs of its control area at least every 6 months and provide updated information to the TSO and DSO in the following situations: a) At least 3 months before planned commissioning of a new network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO. b) At least 3 months before planned final removal from service of the network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO. c) At least 3 months before planned significant modifications in the network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO. d) As soon as practicable if an error is detected in the strcutural data. Explanation: Use of the phrase "in agreement with DSO" gives the DSO a chance to formally acknowledge what is required by the TSO and to be compliant when transferring info from the SGU. Use of the word “planned” brings specificity to the situations described. It could be interpreted that the DSO is non-compliant if it did not inform the TSO of an unplanned event even if it had no prior knowledge of the event – this is not practical. We must take account of this situation. Use of the word “practicable” allows for an unplanned change in the observability area or for practical feedback if there is an error. Definition of error needed: What does "error" mean in paragraph 1 (d)? Does it mean an error in the data set transmitted earlier or does it mean a malfunction of the SGU?	Yes	**Partially accepted.** According to article 40(7) of SO GL, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them so wording of article 16(1) of KORRR (article 15(1) of new KORRR version) is correct as it does not refer to this type of exchanges. However, the article has been amended to introduce some of the changes proposed in points from a) to e), to amend the reference to 3 months and to clarify that “error” means an error in the data set transmitted earlier	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
16	1	REMOVE ARTICLE 16 (1)(a) to (c) - this documents is meant to be about Key Roles, responsibilities and requirements and the information here is meant to be agreed between individual TSOs and their DSOS and SGUs. These should have been included within Regulation 2017/1485 if it was thought that these timings were important.	Yes	**Not accepted.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 16(1) of KORRR (article 15(1) of new KORRR version) set a minimum threshold for updating information that can be adjusted by each TSO at national level during national	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				implementation. According to article 40(7) of SO GL, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them so wording of article 16(1) of KORRR (article 15(1) of new KORRR version) is correct as it does not refer to this type of exchanges. However, the article has been amended to introduce some changes in points from a) to e), to amend the reference to 3 months and to clarify that "error" means an error in the data set transmitted earlier	
16	1	It is for each individual TSO to agree these timing requirements with the affected SGUs. If it was important for the data to follow a particular time line that would be in the SOGL. It is not appropriate to put these requirements in a document that purports to be about organizational arrangements.	Yes	Not accepted. Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 16(1) of KORRR (article 15(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO. According to article 40(7) of SO GL, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them so wording of article 16(1) of KORRR (article 15(1) of new KORRR version) is correct as it does not refer to this type of exchanges. However, the article has been amended to introduce some changes in points from a) to e), to amend the reference to 3 months and to clarify that "error" means an error in the data set transmitted earlier	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
16	1	"1. Each SGU shall review the structural information it shares with the TSOs of its control area at least every 6 months and provide updated information to the TSO and DSO in the following situations: a) At least 3 months before planned commissioning of a new network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO and SGU. b) At least 3 months before planned final removal from service of the network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO and SGU. c) At least 3 months before planned significant modifications in the network element or facility. Upon justification the TSO may define a different timeline in agreement with the DSO and SGU. d) As soon as practicable if an error is detected in the structural data." Definition of error needed: What does "error" mean in paragraph 1 (d)? Does it mean an error in the data set transmitted earlier or does it mean a malfunction of the SGU? Explaination: "Use of the phrase ""in agreement with DSO"" gives the DSO a chance to formally acknowledge what is required by the TSO and to be compliant when transferring info from the SGU. Use of the word “planned” brings specificity to the situations described. It could be interpreted that the DSO is non-compliant if it did not inform the TSO of an unplanned event even if it had no prior knowledge of the event – this is not practical. We must take account of this situation. Use of the word “practicable” allows for an unplanned change in the observability area or for practical feedback if there is an error. Agreement with SGUs is needed to make sure that any request from the TSO can be seen as reasonable by all parties."	Yes	**Partially accepted.** According to article 40(7) of SO GL, KORRR refers to the agreement between TSO and DSOs for the processes to exchange data between them so wording of article 16(1) of KORRR (article 15(1) of new KORRR version) is correct as it does not refer to this type of exchanges. However, the article has been amended to introduce some of the changes proposed in points from a) to e), to amend the reference to 3 months and to clarify that “error” means an error in the data set transmitted earlier	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
16	1	With respect to significant modifications, it is important to add that the timing of such modifications can be adapted during the on-going work. This should also be reflected in this article. Moreover, the article should also foresee a bullet for unforeseen events (e.g. accident, explosion, ...) which would change the structural data from the site but which cannot by there nature be communicated at least three months in advance (and which are not covered by point e on errors, as these relate to data errors)	Yes	**Partially accepted.** Article 16(1) (article 15(1) of new KORRR version) has been reworded to take into account the comment A new point e) has been added to reflect second part of the comments related to the situation of unforeseen modifications.	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
16	1	Proposal (from line 435): Each SGU shall review the structural information it shares with the TSOs of its control area at least every 12 months and provide updated information to the TSO and DSO in the following situations: […] Explanation: There is no reason why the SGUs are obliged to review their structural data every six month. According to the letters a) to d) the important changes in structural data have to be provided within three month anyway. This is an unfounded requirement and shall be adapted to the existing processes.	Yes	**Not accepted.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data Article 16(1) of KORRR (article 15(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO. However, the article has been amended to introduce some changes in points from a) to e), to amend the reference to 3 months and to clarify that "error" means an error in the data set transmitted earlier	BDEW- German Association of Energy and Water Industries
16	1	It is not clear why there is a need to update Information every 6 month when there are already shorter deadlines specified in the following for data relevant changes. A 12 months deadline should be sufficient.	Yes	**Clarification.** Article 40(6) (f) of SO GL requires the KORRR to define the frequency of delivery of the data to be provided by DSO, including the update of structural data. Article 16(1) of KORRR (article 15(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO. However, the article has been amended to introduce some changes in points from a) to e), to amend the reference to 3 months and to clarify that "error" means an error in the data set transmitted earlier	RWE Generation SE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	1	Proposal: 1. All SGUs within the control area of the TSO shall provide scheduled data to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. Non-transmission connected SGUs may provide the data directly to the TSO or through its connecting DSO according to Article 3(4). Explanation: UPM-Kymmene Oyj wants to point out, that SGUs should not under any circumstances be obliged to follow the scheduled data sent to TSO. The obligation would decrease the possibilities of industrial demand flexibility.	No	**Clarification.** Scheduled Data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	UPM-Kymmene Oyj
17	1	Proposal: 1. All SGUs within the control area of the TSO shall provide scheduled data to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. Non-transmission connected SGUs shall provide the data directly to the DSO, unless otherwise agreed between TSO and DSO according to Article 3(4). Explanation: 1. Acording to the new Article 3(4) wording.	No	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 17 (1) of KORRR (article 16(1) of the new KORRR version) as it is written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." Related to agreement: Formats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, while formats for the data exchange between TSOs or DSOs and SGUs are not subject to article 40 (7).	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	1,2, new 3	"1. SGUs within the control area of the TSO shall provide scheduled data to their TSO. Transmission connected SGUs shall provide the data directly to the TSO. Generally, distribution connected SGUs shall provide the data to the TSO through its connecting DSO according to Article 3(4). 2. Transmission-connected SGUs shall comply with the requirements defined by the relevant TSO to exchange scheduled data. Distribution-connected SGUs shall comply with the requirements agreed between the relevant TSO and DSO to exchange scheduled data. 3. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems, excluding the communication channel, to exchange scheduled data with the TSO or DSO unless explicitly otherwise agreed with the TSO or DSO." Explaination: "Paragraph 1 should define cascaded data exchange as the general principle for data exchange regarding SGUs connected to distribution systems. This general rule was agreed in the data management final report of the TSO-DSO-platform (compare page 16 of the final report:""Generally, each system operator should be responsible for directly collecting data from users connected to its grid (generators, consumers, storage, etc.). [...]"" Subject to an agreement between TSO and transmission-connected DSO (as required in Article 40(7) of (EU) 2017/1485), deviating solutions might be agreed bilaterally. Additionally, paragraph 2 should provide for an agreement between TSO and DSO on data format etc., as agreement is required by article 40(7) of (EC) 2017/1485 for all data exchanges related to distribution systems. Paragraph 3 should be adapted to take into account data exchanged with the TSO via the DSO. Furthermore it should be made clear that the data channel is out of the responsibility range, as often public telecom networks are used. General remark: It should be possible for SGUs to only provide updates of scheduled data in case of changes compared to the previous communicated data. In case no changes apply to the unit, sending redundant information should be avoided."	1. No 2. No 3. Yes	1. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 17 (1) of KORRR (article 16(1) of the new KORRR version) as it is written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO.” Related TSO-DSO data management report a clarification should be done. KORRR has been drafted following the mandate of Article 40.6 of the SO GL. The main reference during the drafting of the proposal has been the European in force regulation. Position papers have been taken into account but they cannot be given preference over regulation, especially to limit the possibilities of implementation at national level. KORRR cannot be given preference to only one way to provide the data as it is stated in the explanation of the comment.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				2. **Not accepted. F**ormats for the data exchange between TSOs and relevant DSOs shall be agreed according to article 40(7) of SO GL, while formats for the data exchange between TSOs or DSOs and SGUs are not subject to article 40 (7). Requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(3) of KORRR (article 1(5) of the new KORRR version) and be examined by the competent NRA. **3. Partially accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO. **Related to general remark:** Article 17(1) of KORRR (article 16(1) of new KORRR version) sets a minimum threshold for updating information in line with article 45 of SO GL requirements for DSO.	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	1	Art. 17.1: "Transmission connected SGUs shall provide the data directly to the TSO. Non-transmission connected SGUs may provide the data directly to the TSO or through its connecting DSO according to Article 3(4)". Justification: The previous sentence should be removed, since it contradicts the principle already outlined under article 3.4., i.e. each Member State chooses its data exchange model according to its local features.	No	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 17 (1) of KORRR (article 16(1) of the new KORRR version) as it is written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) "each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." KORRR does not impose the SGUs the use of a specific model. It sets the TSO to define the models it will use and to publish the formats to receive the data.	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	2	Proposal: 2. SGUs shall comply with the requirements defined by the relevant TSO to exchange scheduled data. Explanation: UPM-Kymmene Oyj wants to point out, that SGUs should not under any circumstances be obliged to follow the scheduled data sent to TSO. The obligation would decrease the possibilities of industrial demand flexibility.	No	**No action. No change is proposed.** **Clarification.** Scheduled Data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets, for example balancing markets. Scheduled data shall not be binding because it has been provided to the TSO. It shall be binding depending on the market it has been negotiated. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	UPM-Kymmene Oyj
17	2	Proposal: 2. SGUs shall comply with the requirements defined by the relevant System Operator (TSO or DSO) that directly receives the scheduled data. Explanation: 2. For the sake of rasonability, the Relevant System Operator (TSO or DSO) that direclty receives the scheduled data shall be responsible for defining relevant issues related to this data exchange.	Yes	**Accepted.** Article 17(2) (article 16(2) of new KORRR version) has been reworded to clarify the requirement.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	2	Proposal: "SGUs shall comply with the requirements defined by the relevant TSO, in coordination with SGUs, and submitted to NRA approval, to exchange scheduled data". Explanatio: EDF considers the format needs to be discussed with SGUs.	No	Not accepted. Format and requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(3) of KORRR and be examined by the competent NRA.	EDF
17	3	Proposal: 3. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems to exchange scheduled data with the TSO unless explicitly otherwise agreed with the TSO. Explanation: UPM-Kymmene Oyj wants to point out, that SGUs should not under any circumstances be obliged to follow the scheduled data sent to TSO. The obligation would decrease the possibilities of industrial demand flexibility.	No	No action. No change is proposed. Clarification. Scheduled Data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets, for example balancing markets. Scheduled data shall not be binding because it has been provided to the TSO. It shall be binding depending on the market it has been negotiated. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a service.	UPM-Kymmene Oyj

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
17	3	Proposal: SGUs and TSOs shall establish an communication system to exchange scheduled data between them. Explantation: The way on which scheduled Data is exchanged between SGUs and TSO has to be defined in a bilateral way. SGUs can not be obliged to bear the responsibility for installation, configuration, operation and maintenance of the communication systems especially the SGUs dosen't know the configuration of such a system. (for example: Internet is not secure at all)	No	**Not accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	TIWAG-Tiroler Wasserkraft AG - Dispatching
17	3	Proposal: 3. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems to exchange scheduled data with the relevant system operator (TSO or DSO) unless explicitly otherwise agreed with the Relevant System Operator. Explanation: 3. For the sake of rasonability, the Relevant System Operator (TSO or DSO) that direclty receives the scheduled data shall be responsible for defining relevant issues related to this data exchange.	Yes	**Partially accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
17	3	Proposal: Delete point 3. Explanation: It is duplicate of article 3.7	Yes	**Partially accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done	Swissgrid

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	
17	3	Modification proposal Art. 17.3. "SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems **of their unit, up to the network connection point**, to exchange scheduled data with the TSO or DSO unless explicitly otherwise agreed with the TSO or DSO." Justification: It has to be clarified that SGU have to install and operate not the entire communication system, but only up to the interface with connection point, in order to communicate with network communication systems. As also explained in previous comments, it has to be clarified that data can be exchanged either with TSOs or DSOs, in coherence with article 3.4, as per our modification. Therefore data communication with DSOs should be envisaged.	Yes	**Partially accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	Enel
17	3	DSOs, CDSOs and SGUs shall be responsible for the installation, configuration, security and maintenance of the communication systems "until the point of connection/ point of common coupling" to exchange data with the TSO according to the KORRR unless explicitly otherwise agreed with the TSO. For the case of SGUs, physical infrastructure of communication systems will be limited up to its ownership boundary (typically the Point of Common Coupling). Explanation: - SGUs should not be made responsible to cover the whole costs of installing and maintaining a whole (physical) communication system that we will be managed by the TSO and that might extend for long distances. Thus, the responsibility should end at the point where the SGU is also responsible to comply with the connection code. -It should be clear that SGU are responsible for the installation of physical communication infrastructure (and its maintenance) up to point of ownership boundary between the SGU installation and the TSO or DSO facilities. Any physical	Yes	**Partially accepted.** Article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	WindEurope

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		infrastructure requiered from the SGU to the relevant TSO control /data centre is the responsability of the relevant TSO or DSO. Need explenation: Should Article 17 be removed as the text provisions have been already handled in Article 3? - DSOs, CDSOs and SGUs in paragraph 7 are required to be responsible for installation, configuration, security etc. This is true only if the above stated participants are delivering the communication/data solution. What if due to reducing complexity and having unified solution compatible with the TSO SCADA system, the TSO is deciding on delivering their own designed unit? Or does this mean that TSO's are not able to propose any solutions?			
17	4	Proposal: 4. To enable price dependent demand response, SGUs cannot be obliged to follow the scheduled data sent to TSOs. Explanation: UPM-Kymmene Oyj wants to point out, that SGUs should not under any circumstances be obliged to follow the scheduled data sent to TSO. The obligation would decrease the possibilities of industrial demand flexibility.	No	**Not accepted.** Scheduled Data to be provided to the TSO or DSO under SO GL and KORRR aims to reflect the better forecast to perform, among other tasks, security analysis for the expected situation of the network. These schedules may come from markets or different kind of contracts and may change in subsequent timeframes and markets, for example balancing markets. Scheduled data shall not be binding because it has been provided to the TSO. It shall be binding depending on the market it has been negotiated. Considering the use of scheduled data by the TSO or DSO, the data should be of minimum quality. The firmness or the binding character of the scheduled data shall be determined on national level by the TSO in compliance with art. 40(5) of SO GL on determination of applicability and scope. An obligation to provide schedules does not lead to a limitation on the commercialization of flexibility. The relation between schedules and flexibility should be clarified on national level in the requirements for the delivery of a	UPM-Kymmene Oyj

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				service.	
17	3	Change to "SGUs shall comply with the requirements agreed with the relevant TSO to exchange scheduled data"	Yes	**Not accepted.** Requirements for the data exchange between TSOs or DSOs and SGUs are not subject to article 40 (7) so they don´t have to be agreed. However, article 17(3) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 17(3) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	RWE Generation SE
18	1	Clarification: According to the text, each SGU that cannot provide real-time-data has to give reasons why it is not capable of doing so. In Austria and Germany a larger number of SGUs can be concerned in being not capable of providing these data. Instead each TSO should justify why the data that is not older than one minute instead.	Yes	**Clarification. S**GUs required to provide data, including real time data, can be defined at national level according to article 40(5) of SO GL subject to NRA approval. Those SGUs will be responsible for providing data according to their capabilities. SGUs subject to Connection Codes shall have the capabilities to exchange real time data. SGUs not subject to Connection Codes are required to provide data according to their current capabilities, not to adapt to the connection codes requirements. Those capabilities need to be communicated to the System Operators to know how the SGUs can provide real time	TIWAG-Tiroler Wasserkraft AG - Dispatching

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				data. Article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	
18	1	Proposal: 1. Provision of real time data shall be performed as soon as possible after the entry into force of the KORRR. In any case, provision of real time data shall be performed from 2 years after the entry into force of the KORRR. Explanation: 1. This provision should be removed based on the following reasons: - Unlike the Connection Network Codes (CNCs), the GL SO gives no room for exemptions to existent facilities. - In the CNCs, exemptions are granted by the NRA not by system operators. - All facilities are subject to CNCs either as new facilities or existent facilities. Therefore, the proposed wording makes nosense. Since exemptions are not considered in the GL SO, a long implementation time seems a good approach to deal with this issue.	Yes	**Partially accepted**. Article 18(1) (article 17(1) of new KORRR version) does not define the entry into force of Articles 41 to 53 of SO GL because it is already defined in Article 192 of SO GL. Article 40(5) of SO GL allow TSOs, in coordination with DSOs and SGUs and subject to NRA approval to define the scope and applicability of this data exchange. According to this, it would be possible not to request to provide real time data to all SGUs, but all SGUs defined in line with Article 40(5) of SO GL shall provide data according to their capabilities, independently of being subject or not to the Connection Codes. However, article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	1	Proposal: Art18.1 - "All SGUs which are power generation modules not subject to the EU Regulations 2016/631, or which are HVDC systems not subject to EU Regulations 2016/1447, or which are demand facilities not subject to EU Regulations 2016/1388, shall comply with the requirements under this KORRR regarding to the real-time data exchange. The delay to comply with the requirements in the KORRR shall be set during national coordination. TSOs or DSOs publishes non-discriminatory criteria to exempt particular SGU from requirement to provide real time data. These criteria have to be approved by NRA. Explanation: This paragraph states that all existing SGUs shall comply by 3 months after the applicability of requirements in the KORRR. The timeline to comply with the KORRR will highly depend on requirements adopted by each TSO at national level. The investments to be made and consequently the timeline to comply will most probably be very different. It would be better to define the deadline for compliance during the national consultation. Furthermore, "in case of non-compliance, […] SGUs shall provide TSO or DSO technical justification, that shall be evaluated by TSOs or DSOs". EDF is very surprised that TSOs or DSO could evaluate the technical justifications provided by SGUs and to decide to exempt or not the SGUs. EDF considers that TSOs or DSOs have to publish non-discriminatory criteria to exempt SGUs and that these criteria have to be approved by NRA.	Yes	**Partially accepted.** Article 18(1) (article 17(1) of new KORRR version) does not define the entry into force of Articles 41 to 53 of SO GL because it is already defined in Article 192 of SO GL. Article 40(5) of SO GL allow TSOs, in coordination with DSOs and SGUs and subject to NRA approval to define the scope and applicability of this data exchange. According to this, it would be possible not to request to provide real time data to all SGUs, but all SGUs defined in line with Article 40(5) of SO GL shall provide data according to their capabilities, independently of being subject or not to the Connection Codes. However, article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	EDF
18	1	Article 18(1) - require clarity on what this means and who it is trying to apply the requirements of KORRR. It seems to be extending the reach of KORRR to things outwith the grid connection codes how can you be an SGU which is not subject to the Grid Connection Codes?		**Clarification.** Article 40(5) of SO GL allow TSOs, in coordination with DSOs and SGUs and subject to NRA approval to define the scope and applicability of this data exchange. According to this, it would be possible not to request to provide real time data to all SGUs, but all SGUs defined in line with Article 40(5) of SO GL shall provide data according to their capabilities, independently of being subject or not to the Connection Codes. SGUs required to provide data, including real	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				time data, can be defined at national level according to article 40(5) of SO GL subject to NRA approval. Those SGUs will be responsible for providing data according to their capabilities. SGUs subject to Connection Codes shall have the capabilities to exchange real time data. SGUs not subject to Connection Codes are required to provide data according to their current capabilities, not to adapt to the connection codes requirements. Those capabilities need to be communicated to the System Operators to know how the SGUs can provide real time data. Article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	
18	1	IFIEC has voiced strong concerns with this point during the workshop and wants to reiterate these comments here. As Art18 1° is written now, all SGUs which cannot provide 1 minute values (de facto, presumably at least a very large subset of all existing installations) because this capability is lacking as the requirement did not exist at the time of commissioning of these installations will each individually have to provide a dossier with technical justification to the TSO or DSO (and CDSO?) by 3 months after applicability of the requirements in the KORRR, representing a huge workload for all these grid users without any added value to the grid. Moreover, the TSO will have to evaluate all these technical justifications or will have to coordinate on them with the DSOs (and CDSOs?) and take a decision (and as always, ENTSO-e has not foreseen any deadline for the TSO to take such decision). This is an enormous workload (and cost) for all involved parties, without any clear added value. Moreover, a decision by the TSO could lead to discrimination or at least arbitrary decisions. Such decision would maybe rather be taken by an independent authority, but this would only add to		Clarification. Article 40(5) of SO GL allow TSOs, in coordination with DSOs and SGUs and subject to NRA approval to define the scope and applicability of this data exchange. According to this, it would be possible not to request to provide real time data to all SGUs, but all SGUs defined in line with Article 40(5) of SO GL shall provide data according to their capabilities, independently of being subject or not to the Connection Codes. SGUs required to provide data, including real time data, can be defined at national level according to article 40(5) of SO GL subject to	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		the system cost. IFIEC pleads strongly for a more pragmatic approach which will not create a huge administrative burden for all existing installations and all system operators, without clear added value of this procedure.		NRA approval. Those SGUs will be responsible for providing data according to their capabilities. SGUs subject to Connection Codes shall have the capabilities to exchange real time data. SGUs not subject to Connection Codes are required to provide data according to their current capabilities, not to adapt to the connection codes requirements. Those capabilities need to be communicated to the System Operators to know how the SGUs can provide real time data. Article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	
18	1,2,3,4	"1. Delete 2. All SGUs within the control area of the TSO shall provide real time data in accordance with Articles 47, 50, 52(3) and 53 of Regulation 2017/1485 to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. In general, non-transmission connected SGUs shall provide data through their connecting DSO. In agreement between TSO and DSO, non-transmission connected SGUs may provide the data directly to the TSO. 3. Each SGU providing data directly to the TSO or DSO shall fulfil the requirements defined by the TSO in terms of: a) Logical connections between parties and protocols used; b) Network architecture including redundancy; c) Network security rules; d) ID and/or naming convention and data quality; e) Data Transmission Parameters and performance; f) Rules of conduct in the case of planned outages and disturbances of communication equipment.	1. Yes 2. Yes 3. Yes 4. Yes	1. **Not accepted.** However article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it 2. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 18 (2) of as it was written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		4. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems, excluding the communication channel, to exchange real time data with the TSO or DSO unless explicitly otherwise agreed with the TSO or DSO." Explaination: "Paragraph 1 should be deleted completely. It is completely unjustified why a retrospective application of the requirements should be necessary. TSOs should provide thorough justification before applying any requirements retrospectively. Furthermore, the process for exemptions is costly, bureaucratic and unsuitable. E.g. Germany faces more than 50000 existing SGUs. If all of these SGUs should be required to apply for justified exemption, costs will exceed 50 Mio. EUR (if we assume 1000,- EUR per SGU to be processed). Furthermore, DSOs would have to assess each and every of these justifications, a process they are not prepared for. Additionally, SGUs have the right to complain at the NRA if they do not agree to the outcome of the assessment, i.e. NRAs will face a significant number of complaints. Paragraph 2 has been adapted as in the previous articles. Paragraph 4 should be adapted to take into account data exchanged with the TSO via the DSO. Furthermore it should be made clear that the data channel is out of the responsibility range, as often public telecom networks are used."		decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." KORRR cannot be given preference to only one way to provide the data. However, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval. 3. **Accepted.** Article 18(3) (article 17(3) of new KORRR version) has been amended to reflect data exchanged with the TSO or with the DSO. 4. **Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	2,3,4	2. All SGUs within the control area of the TSO shall provide real time data in accordance with Articles 47, 50, 52(3) and 53 of Regulation 2017/1485 to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. In general, non-transmission connected SGUs shall provide data through their connecting DSO. In agreement between TSO and DSO, non-transmission connected SGUs may provide the data directly to the TSO. 3. Each SGU providing data directly to the TSO or DSO shall fulfil the requirements defined by the TSO in terms of: a) Logical connections between parties and protocols used; b) Network architecture including redundancy; c) Network security rules; d) ID and/or naming convention and data quality; e) Data Transmission Parameters and performance; f) Rules of conduct in the case of planned outages and disturbances of communication equipment. 4. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems, excluding the communication channel, to exchange real time data with the TSO or DSO unless explicitly otherwise agreed with the TSO or DSO. Explanation: Paragraph 1 should be deleted completely. It is completely unjustified why a retrospective application of the requirements should be necessary. TSOs should provide thorough justification before applying any requirements retrospectively. Furthermore, the process for exemptions is costly, bureaucratic and unsuitable. E.g. Germany faces more than 50000 existing SGUs. If all of these SGUs should be required to apply for justified exemption, costs will exceed 50 Mio. EUR (if we assume 1000,- EUR per SGU to be processed). Furthermore, DSOs would have to assess each and every of these justifications, a process they are not prepared for. Additionally, SGUs have the right to complain at the NRA if they do not agree to the outcome of the assessment, i.e. NRAs will face a significant number of complaints. Paragraph 2 has been adapted as in the previous articles. Paragraph 3 should be adapted to take into account data exchanged with the TSO via the DSO. Furthermore it should be made clear that the data channel is out of the responsibility range, as often public telecom networks are used.	2. Yes 3. Yes 4. Yes	2. **Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 18 (2) of as it was written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO.” KORRR cannot be given preference to only one way to provide the data. However, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval. 3. **Accepted.** Article 18(3) (article 17(3) of new KORRR version) has been amended to reflect data exchanged with the TSO or with the DSO. 4. **Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Explain: Logical Connections		version of KORRR. Also, an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO. . **Clarification.** The definition of logical connection will be added to the supporting document	
18	2	Proposal: 2. All SGUs within the control area of the TSO shall provide real time data in accordance with Articles 47, 50, 52(3) and 53 of Regulation 2017/1485 to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. Non-transmission connected SGUs shall provide the data directly to the DSO, unless otherwirse agreed between TSO and DSO according to Article 3(4). Explanation: 2. Acording to the new Article 3(4) wording.	Yes	**Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 18 (2) of as it was written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO." KORRR cannot be given preference to only one way to provide the data. However, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	1,2	1. All SGUs which are power generation modules not subject to the EU Regulations 2016/631, or which are HVDC systems not subject to EU Regulations 2016/1447, or which are demand facilities not subject to EU Regulations 2016/1388, shall comply with the requirements under this KORRR regarding to the real time data exchange. In case of non-compliance, "TSOs or DSO might request SGUs to technical justifications, that shall be evaluated by TSO or DSO. On the basis of this evaluation TSO or DSO in coordination with the TSO, may exempt particular SGU from requirement to provide real time data." 2. All SGUs within the control area of the TSO shall provide real time data in accordance with Articles 47, 50, 52(3) and 53 of Regulation 2017/1485 to the TSO. Transmission connected SGUs shall provide the data directly to the TSO. Non-transmission connected SGUs must provide the data directly to its connecting DSO according to Article 3(4). Explanation: 1. As ENTSO-e explained during the stakeholders workshop, TSOs do not intent to force existing SGUs to retroffiting their existing installations to comply with real-time data exchange requirement. However TSOs wanted to ensure that those SGUs which today have the capabilities (and do communicated in real time) continue to have such an obligatation. We shouldn't set by default the proof of non-compliance to all existing SGUs, as this might create a huge administrative burders for thousands/million of small facilities (which do not have the technical capabilities). If TSOs observe that certain large plants (which are supposed to have the capabilities) do not comply, then TSO should have the option to demand explanations 2. The arguments above are developed because it might be difficult for old installations to comply with 100% of the new rules without significant R&D and hardware change effort. In some cases, it might even be needed to adjust the wind farm software as well (so it becomes even more complicated). 3. There should be only one point of contact DSO, TSO or Agregator in order to reduce complexity and costs.	1. Yes 2. Yes	**1. Not accepted.** Article 18 (1) (article 17(1) of new KORRR version) has been amended to clarify it **2. Not accepted.** Article 3(4) of KORRR (article 3(3) of the new KORRR version) reflects the wording and intention of Article 40(5) of SO GL read in conjunction with Articles 58 to 50 and 53 of SO GL. Article 18 (2) of as it was written reflects the wording and intention of article 3(4) (article 3(3) of the new KORRR version) “each TSO, in coordination with the DSOs in its Control Area, shall define whether the distribution connected SGUs in its control area shall provide the structural, scheduled and real time data to the TSO directly or through its connecting DSO or to both The decision for each type of information and type of SGU may be independent. When the data is directly provided to the TSO, after request of the DSO to whose network the SGU is connected, the TSO shall make it available for the DSO. When the data is provided to the DSO, the DSO shall provide the data to the TSO.” KORRR cannot be given preference to only one way to provide the data. However, article 18(2) has been deleted and a new article 6(5) was added to the new KORRR version to include a reference to Article 40(5) of SO GL to make clear the scope of the article and the need of NRA approval.	WindEurope

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	3	Proposal: 3. Each SGU shall fulfil the requirements defined by the relevant system Operator (TSO or DSO) in terms of: Explanation: 3. For the sake of rasonability, the Relevant System Operator (TSO or DSO) that direclty receives the real-time data shall be responsible for defining relevant issues related to this data exchange.	Yes	**Accepted.** Article 18(3) (article 17(3) of new KORRR version) has been amended to reflect data exchanged with the TSO or with the DSO.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
18	3	Proposal: Art18.3 - “Each SGU providing data directly to the TSO shall fulfil the requirements, defined by the TSO up to connection point or telecommunication terminal, in coordination with SGUs, in terms of: a) Logical connections between parties and protocols used,; b) Network architecture including redundancy, c) Network security rules; d) ID and/or naming convention and data quality; e) Data Transmission Parameters and performance; f) Rules of conduct in the case of planned outages and disturbances of communication equipment". Explanation: EDF considers that the format needs to be discussed with SGUs. Furthermore, EDF considers SGUs would be able to fulfill the requirements up to the connection point or telecommunication terminal (for example up to the connection point for power plant). Finally, EDF wonders about the definition of “performance” and would like it to be clarified.	Yes	**Not accepted.** SGUs shall be responsible for the communication systems until the "communication interface point," from this "communication interface point", the responsibility shall be of the System Operator. The "communication interface point" between TSO and DSO shall be agreed among them and between the SGUs and the System Operators, it shall be defined by the System Operator. However, article 18(3) (article 17(3) of new KORRR version) has been amended to reflect data exchanged with the TSO or with the DSO and article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also, an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	EDF
18	3	As a final remark on art18 3°, "rules of conduct" is introduced again. For IFIEC, it is unclear which rules of conduct are meant here and who will introduce tem and approve them.	No	**Clarification.** The definition of rules of conduct will be added to the supporting document	IFIEC Europe

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	3	Change to "Each SGU providing data directly to the TSO shall fulfil the requirements agreed with the TSO in terms of..."	Yes	**Not accepted.** Requirements for the data exchange between TSOs or DSOs and SGUs are not subject to article 40 (7) so they don´t have to be agreed. However, article 18(3) (article 17(3) of new KORRR version) has been amended to reflect data exchanged with the TSO or with the DSO.	RWE Generation SE
18	4	Proposal: 4. SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems to exchange real time data with the relevant system operator (TSO or DSO) unless explicitly otherwise agreed with the Relevant System Operator. Explanation: 4. For the sake of rasonability, the Relevant System Operator (TSO or DSO) that direclty receives the real-time data shall be responsible for defining relevant issues related to this data exchange.	Yes	**Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	UNESA -THE SPANISH ASSOCIATION OF THE ELECTRICITY UTILITIES-
18	4	Proposal: Delete point 4. Explanation: It is duplicate of article 3.7	Yes	**Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	Swissgrid

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	4	Proposal: Art.18-4 – "SGUs shall be responsible for the installation, configuration, security and maintenance of the equipment necessary to provide data to the TSO according to the KORRR up to the connection point or telecommunication terminal of TSOs or DSOs' unless explicitly otherwise agreed with the TSO or DSO". Explanation: EDF considers that DSOs, CDSOs and SGUs are responsible for installation, configuration, security and maintenance of their own exchange data equipment up to the connection point with the transportation or distribution system, or up to TSOs' or DSO's telecommunication terminals. Modem and telecommunication links are the properties of TSOs or DSOs, therefore SGUs cannot be held responsible for the damages or outages on this telecommunication network.	Yes	**Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also, an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	EDF
18	4	Article 18(3) wording should be consistent with Article 10(3) i.e. use of 'current all TSO practices'	No	**Clarification:** TSO practices will be defined and published at ENTSO-E level so unified at European level. They refer to the exchange of information among TSOs not with other parties, this is why it is only reflected in article 10 (3) (article 10 (4) of new KORRR version). In article 18(3) (article 17(2) of new KORRR version) KORRR refers to real time data provided by SGUs, so to give flexibility to the national implementation it wasn´t include the reference to "current all TSOs practices" in that article, but it will be also possible to implement those practices agreed between TSOs if it is possible.	SP Energy Networks

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
18	4	**Modification proposal** Art. 18.4. "SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems of their unit, up to the network connection point, to exchange real time data with the TSO or DSO unless explicitly otherwise agreed with the TSO or DSO." Justification: It has to be clarified that SGU have to install and operate not the entire communication system, but only up to the interface with connection point, in order to communicate with network communication systems. As also explained in previous comments, it has to be clarified that data can be exchanged either with TSOs or DSOs, in coherence with article 3.4, as per our modification. Therefore data communication with DSOs should be envisaged.	Yes	**Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also, an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	Enel
18	4	3.10. Article 18 - clarification Proposal (from line 479): SGUs shall be responsible for the installation, configuration, operation and maintenance of the communication systems to exchange real time data with the TSO unless explicitly otherwise agreed with the TSO. The responsibility has nothing to do with the costs. Explanation: According to the text, each SGU that cannot provide real-time-data has to give reasons why it is not capable of doing so. In Germany a large number of SGUs can be concerned in being not capable of providing these data. Instead each TSO should justify why the data that is not older than one minute is needed. Besides, aggregators cannot be hold responsible for the provision or quality of data that is provided by third parties (e.g. power generation modules with separate owners). Responsibility (ref. line 479): The responsibility has nothing to do with the costs.	Yes	**Partially accepted**. Article 18(4) has been deleted as it will be reflected in the new KORRR version as new article 3(7), unifying article 18(4) and article 3(7) from the old version of KORRR. Also, an amendment in article 3(7) of the old version has been done as it will be split into 3 new articles (article 3(6) 3(7) and 3(8) of the new KORRR version) to clarify responsibilities of DSO and SGUs for the communication systems until the communication interface point with the TSO.	BDEW- German Association of Energy and Water Industries EnBW Energie Baden-Württemberg AG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
19	0	Article 19 should be deleted completely. Explanation: Paragraph 19 should be deleted completely, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange between TSOs and NEMOs is not subject of Title II. TSOs are therefore not entitled to define anything with regard to NEMOs in KORRR.	Yes	**Accepted. Article 19 has been deleted**	EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG
19	0	Proposal (from line 483): Delete the whole Article As there is no regulation to NEMOS in the SO-GL, they should not be mentioned in the KORRR proposal. BDEW proposes to delete the whole Article 19.	Yes	**Accepted. Article 19 has been deleted.**	BDEW- German Association of Energy and Water Industries
19	1,2,3,4	Proposal: This article should be deleted: Explanation: As there is no regulation to NEMOS in the SO-GL, they should not be mentioned in the KORRR proposal.	Yes	**Accepted. Article 19 has been deleted.**	TIWAG-Tiroler Wasserkraft AG - Dispatching
19	1,2,3,4	Proposal: Delete article. Explanation: We suggest deleting Article 19 of the present proposal. We understand the approach to mention all involved parties in the data exchange process. However, the obligation for NEMOs to share market results and cooperate with TSOs is already stipulated in other EU legislation, incl. Commission Regulation 2015/1222 (CACM, mainly Article 62) and Commission Regulation 543/2013 on the submission and publication of data in electricity markets. Furthermore, the SO GL itself does not mention any NEMO roles or responsibilities, and KORRR is only an implementing and not a legislative document. The enforceability of Article 19 would not be given as it is not in line with the SO GL.	Yes	**Accepted. Article 19 has been deleted.**	Association of European Energy Exchanges (Europex)

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
19	-	Article 19 should be deleted completely. Explanation: Paragraph 19 should be deleted completely, as KORRR is limited to data exchange as described in Title II of (EU) 2017/1485, as clearly stated in Article 40(6) of (EU) 2017/1485. Data exchange between TSOs and NEMOs is not subject of Title II. TSOs are therefore not entitled to define anything with regard to NEMOs in KORRR.	Yes	**Accepted. Article 19 has been deleted.**	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
19	-	We suggest to delete the whole article 19. We understand the approach of the drafting team to mention all the parties involved in the data exchange process as it was analyzed, however the obligation of NEMOs to share the market results and cooperate with TSOs is already foreseen in other EU legislation, commission regulation 2015/1222 CACM (mainly article 62) and commission regulation 543/2013 on submission and publication of data in electricity markets. Furthermore the SOGL itself does not mention the NEMO roles or responsibilities and KORRR is only implementary legislation document. The enforceability of the Article 19 by law may be difficult as it is not in line with SOGL.	Yes	**Accepted. Article 19 has been deleted**	OTE, a.s.
20	1	"1. Upon approval of this KORRRs proposal ENTSO-E and each TSO shall publish it on the internet in accordance with Article 8(1) of Regulation 2017/1485. 2. TSOs shall apply the proposed KORRRs as described in Title 2 as soon as all regulatory authorities have approved the proposed KORRRs or a decision has been taken by the Agency in accordance with Article 6(8) and 7(3) of the Regulation 2017/1485." Explanation: "Regulation (EU) 2017/1485 clearly states in ist Article 40(6):""The organisational requirements, roles and responsibilities shall be published by ENTSO for Electricity."". Draft KORRR should respect this obligation. KORRR can only be applied after the acceptance of all NRA or a decision by the Agency. For the avoidance of doubt, the reference to ""18 months after entry into force..."" should be deleted. The earliest application date is the day after its final acceptance. "	1. No 2. No	**1. Not accepted.** In KORRR it is reflected the requirement stated in article 8(1) of SO GL: "TSOs responsible for specifying the terms and conditions or methodologies in accordance with this Regulation shall publish them on the internet following approval by the competent regulatory authorities or, where no such approval is required, following their specification, except where such information is considered confidential in accordance with Article 12." So KORRR respects the obligation reflected in article 40 (6) of SOGL as they should be seen as complementary. ENTSO-E shall publish the KORRR to comply with SO GL and TSOs shall publish it to comply with KORRR. **2. Not accepted.** According to article 192 of	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE, EWE NETZ GmbH innogy SE SWM Infrastruktur GmbH & Co. KG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
				SOGL "Articles 41 to 53 shall apply 18 months after the entry into force of this Regulation […]" also article 40 (7) of SO GL refers to 18 months period.	
21		"The reference language for this KORRR Proposal shall be English. For the avoidance of doubt, TSOs need to translate this KORRR Proposal into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 8 (1) of the Commission Regulation (EU) 2017/1485 and any version in another language, the relevant TSOs shall, in accordance with national legislation, provide the relevant national regulatory authorities with an updated translation of the KORRR." Explaination: Data flow implementation documentation of TSO's needs to be available in national language + English (international business language)	No	**Not accepted.** Second part of article 21 (article 19 of new KORRR version) is a clarification not an obligation. With the change proposed, KORRR will impose the obligation for TSOs to translate the KORRR into their national languages. KORRR just want to clarify what happens in the event of inconsistencies between the English version and any other version in another language.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		Clarification: Regulation 2017/1485 constitutes the legal basis for organisational requirements, roles and responsibilities relating to data exchange. Therefore the TSOs' proposal (KORRR proposal) has to be developed within the legal framework of the Guidelines provisions and cannot impose additional requirements. The Guidelines force that additional requirements can be defined during the national consultation but not in the KORRR.	No	**Clarification:** KORRR purpose is not to define additional requirements but to establish the roles, requirements and responsibilities when implementing at national level the data exchange processes according to SO GL. It shall be implemented in conjunction with the implementation of Articles 40(5) and 40(7).	EDF

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		Clarification: The content of the document is quite generic and it is therefore difficult to provide very specific comments. EUTurbines would like to hereby make the following general remarks: The requirements and Real Data to be exchanged shall be coordinated between TSO and SGU and between DSO and SGU, depending on the configuration. The number of data and requirements shall be reasonable (technically and economically) and shall not create an unnecessary cost burden. The number of data can be taylored, depending on technology-specific information. In this respect, TSOs and DSOs shall be responsible to ensure a minimum level of harmonisation on requirements, limiting an unnecessary burden when considering efficient solutions (eventually in agreement with SGU and industry). In addition, it remains unclear who is in charge of the security of the system (cyber security) and data protection exchanged, which shall be TSO's and DSO's responsibility. The Data exchanged shall be defined in order not to affect the SGU safe operation (and eventually the safety of the electrical system). It is not clear from the document who takes this responsibility. TSOs can define the data, but SGU can limit such request in case there is a consistent risk to their plant/equipment operation. 3 months time shall be the timing for defining the solution rather than to implement it. Understanding, collecting data, studying the problem, defining and implementing the solution can be very easy on a small system but can be very complex in a big system. This can even require the shut-down of the unit, which is typically an action that needs planning time. The level of disruption, on which the request is based, needs to be defined.	No	**Clarification:** **1.** Format and requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA. **2.** In accordance with articles 3(6), 3(7) and 3(8) of KORRR, SGUs shall be responsible for the communication links until the "Communication Interface Point," from this "Communication Interface Point," the responsibility shall be of the System Operator. The "Communication Interface Point" between TSO and DSO shall be agreed among them and between the SGUs or CDSOs and the System Operators, it shall be defined by the System Operator. **3.** Data exchange shall not affect safe operation of the plant/equipment. In case the SGU consider that there is a risk caused by the data provision, it can be communicated to the System Operator and to the NRA who shall examine the proportionality of que requirement.	EUTurbines – European Association of Gas and Steam Turbine Manufacturers
General		With respect to already existing high efforts for SGUs to providing data to TSOs additionla efforts by changing data formats in existing processes, changing data flows to different IT-systems, or by using different formats for sending data to differen TSOs (for international active SGUs) should be avoided. In general data	No	**Clarification:** Format and requirements to exchange data between the TSOs, DSOs and SGUs in each control area may be defined at national level. The proportionality of the	RWE Generation SE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		formats and data Exchange processes shpuld be agreed between TSOs, DSOs, and SGUs in order to minimize efforts.		System Operator decision has to be respected according to articles 4(2) of SO GL and 1(5) of KORRR and be examined by the competent NRA.	
General		EnBW Energie Baden-Württemberg AG (EnBW) welcomes the opportunity to comment on ENTSO-E´s draft version of the "All TSOs' proposal for the Key Organisational Requirements, Roles and Responsibilities (KORRR) relating to Data Exchange in accordance with Article 40(6) of the Commission Regulation (EU) 2017/1485 of 02 August 2017 establishing a Guide-line on Transmission System Operation" (KORRR proposal). In order to simplify the national implementation of the SO-GL EnBW would like stress the following points: • Some references in the KORRR proposal are unclear and quite a few interpretations of the legal framework do not correspond to the usual interpretation of the SO-GL. It has to be ensured that the KORRR proposal is consistent with the underlying legal framework. • In Countries with more than one TSO, it seems not to be cost efficient to use different format for each control area. • In order to avoid inefficiency, the data provided by the SGU is either send to the DSO or the TSO. The distribution and transmission system operators shall exchange the data among each other, so that the SGU can provide the data to one single point of contact. As much of the data is already being sent to the TSO, SGUs should be able to use this also for potential additional data. • Changes in the grid of the DSO affect the TSO and vice versa. Though, the DSO should get the same quality and quantity of information from the TSO. The Data ex-change from the TSO to DSO should be part of the KORRR proposal.	No	Clarification: 1. KORRR purpose is not to define additional requirements but to establish the roles, requirements and responsibilities when implementing at national level the data exchange processes according to SO GL. It shall be implemented in conjunction with the implementation of Articles 40(5) and 40(7). 2. KORRR does not prevent TSOs in the same country to agree on a common formats or procedures for the data exchange 3. The KORRR reflects the idea SGUs should be allowed to provide data only to the TSO or to the DSO to which they are connected and then the TSO and the DSO shall exchange between them the data related to those SGU according to article 40(7) of SOGL 4. Reciprocity between TSOs and DSOs is guaranteed by article 3(3) of the new version of KORRR that reflects the wording and intention of article 40 (5) in conjunction with articles 48 to 50 and 53 of SO GL. However those articles of KORRR where exchanges between DSO and TSO should be done under agreement have been amended	EnBW Energie Baden-Württemberg AG

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		1) The last but two sentence of recital (2) need to be changed: "[...] To achieve this goal, it is necessary that each party of the electric system has the necessary observability of the network elements and services with impact in their activities.[...]" to make sure the reference is unambiguous. The last but one sentence of recital two ("Of special relevance is the global demand-generation balance, whose responsibility is assigned to the TSO in Regulation (EC) No 714/2009.") should be deleted completely. The task of global demand-generation balance assigned to TSOs in (EC) 714/2009 refers to the long-term timeframe in the range of the TYNDP. It has no relevance for the timeframe KORRR refers to nor is it subject to Title II of (EU) 2017/1485, to which KORRR is limited. 2) The last sentence of recital (3) ("This complementarity refers to who, how and when the data defined in GLDPM has to be exchanged.") should be deleted. GLDPM already defines who, how and when data has to be exchanged. Cf. e.g. Art. 3(4) (who), art. 4 (how) and art. 16 (when) of GLDPM. If TSOs deem those definitions insufficient they shoud justify any further need. 3) In recital (6), article 40(7) of (EU) 2017/1485 should be cited correctly:"Article 40(7) specifies the obligation for the TSOs to agree with the relevant DSOs on the process for exchanging provision and management of information between them, including, where required for efficient network operation, the provision of data related to distribution systems and SGUs." 4) In recital (7), the last sentence ("The KORRR shall include the method for assessing the relevant of network elements to define the observability area of the TSO.") should be deleted. It is not the task of KORRR to include such a method, but the task of the methodology to be developed following art. 75 of (EU) 2017/1485. This is clearly defined in art. 75 (2) of (EU) 2017/1485:"[...]The methods referred to in point (a) of paragraph 1 shall allow the identification of all elements of a TSO's observability area, being grid elements of other TSOs or transmission-connected DSOs, power generating modules or demand facilities.[...]" 5) Recital (8) should be rewritten to:"Article 40(10) specifies the right of DSOs with a connection point to a transmission system to receive the relevant structural, scheduled and real-time information from the relevant TSOs and to gather the relevant structural, scheduled and real- time information from the neighbouring DSOs." to cite the first sentence of art. 40(10) of (EU) 2017/1485 correctly.	1. Yes 2. Yes 3. Yes 4. Yes 5. Yes 6. No 7. Yes 8. Yes 9. Yes 10. Yes	1. **Accepted.** Recital (2) of whereas section has been amended to clarify the reference to achieve the goal of the SO GL. It also has been updated with a reference to the guideline on electricity balancing that has already entered into force instead of the reference to Regulation (EC) No 714/2009. 2. **Not accepted**. However, the last sentence of recital (3) has been amended to clarify it and also to state that GLDPM only refers to data exchange until day ahead, while KORRR also covers real time data exchange. 3. **Accepted**. Recital (6) has been amended to take into account “agree” word in the text instead “coordinate” 4. **Accepted**. Last sentence of recital (7) has been deleted. 5. **Accepted.** Recital (8) has been amended to take into account first part of article 40 (10) of SO GL. 6.**Not accepted**. Article 4.1.b of the SO GL sets as an objective determining common interconnected system operational principles but the SO GL is not limited to that objective. Thus, application of the KORRR shall not be limited to the data exchanged according to the GLDPM that has been developed according to the CACM. On the other hand, investment done to exchange data according to the GLDPM will allow to exchange that data in the application of the SO GL. 7. **Recital (12)** has been amended. 8. **Accepted.** Recital (13) has been amended9. 9. **Not accepted.** However, Recital (17) has been amended in line with article 4 (1) (h). 10. **Accepted**. Recital (18) has been amended	SWM Infrastruktur GmbH & Co. KG, Innogy SE, EWE NETZ GmbH

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		6) Recital (11) should be rewritten to:"In the aim to facilitate common operational planning principles as requested by Article 4(1)(b) of Regulation 2017/1485, KORRR Proposal takes into account all data already requested by GLDPM and GLDPM v2 to prepare scenarios to perform operational security analysis in the planning stage. This data is deemed sufficient to fulfill this task". Data necessary for coordinated security analysis and operational planning is already requested by GLDPM and GLDPM v2. If the data set of these two GLDPM-documents is insufficient, data demand going beyond that should be thoroughly justified. Stakeholders already invest in data exchange technologies to facilitate data exchange emanating from GLDPM and GLDPM v2. If data demand is changed by KORRR, stakeholders see the risk of stranded investments. 7) Recital (12) should be rewritten to:"KORRR Proposal includes the organization to exchange, among other, real time data between TSOs, necessary to perform the load-frequency control processes as defined in Article 4(1)(c) of Regulation 2017/1485 and, more specifically, in Article 141(3) of Regulation 2017/1485 for each monitoring area." The only application of real time data and its exchange for load-frequency control processes is the monitoring of real-time active power exchange between monitoring areas (and, consequently, LFC blocks and synchronous areas). Therefore, real-time data exchange for LFC should be limited to this purpose. 8) Recital (13) should be rewritten to:"To ensure the conditions for maintaining operational security throughout the Union as specified in Article 4(1)(d) of Regulation 2017/1485, TSOs need to have good observability of the System in order to perform reliable security analysis. KORRR proposal aims to set the framework for the TSOs to access necessary data of their respective observability area." This change is necessary to make clear it is not the task of KORRR to ensure observability, but the methodology stemming from article 75 of (EU) 2017/1485. 9) Recital (17) should be changed to:"KORRR Proposal will contribute to the efficient operation and development of the electricity transmission system and electricity sector in the Union while having good observability of the system to perform reliable security analysis and thus identifying necessary improvements in the Transmission System." As it would be sufficient and efficient to identify necessary improvements instead of possible improvements. 10) Recital (18) should be rewritten to:"In conclusion, the KORRR Proposal contributes to the general objectives of the Regulation 2017/1485 to the benefit of consumers." to put consumers at heart of this methodology.		to add consumers.	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		The German Association of Energy and Water Industries (BDEW) represents over 1,800 members of the electricity, gas and water industry. In the energy sector, BDEW represents companies active in generation, trading, transmission, distribution and retail. BDEW represents e.g. 95% of the DSO-Grid in Germany. BDEW welcomes the opportunity to comment on ENTSO-E´s draft version of the "All TSOs' proposal for the Key Organisational Requirements, Roles and Responsibilities (KORRR) re-lating to Data Exchange in accordance with Article 40(6) of the Commission Regulation (EU) 2017/1485 of 02 August 2017 establishing a Guideline on Transmission System Operation" (SO-GL, KORRR proposal). Taking into account that the transmission system operators (TSOs) organised within BDEW are, among others, responsible for the drafting and finalisation of the KORRR proposal, the BDEW Position Paper has been developed with the abstention of the German TSOs. In order to simplify the national implementation of the SO-GL BDEW would appreciate a KORRR proposal that is legally clear. That means that it neither extends nor contradicts the content of the SO-GL. Thus, BDEW would like to stress the following points: • Some references in the KORRR proposal are unclear and quite a few interpretations of the legal framework do not correspond to the wording of the SO-GL. It has to be ensured that the KORRR proposal is consistent with the underlying legal framework. For example, KORRR should strictly be limited to data exchanges necessary for the legal tasks assigned to TSOs in the SO-GL and described in Title II of the SO-GL. Data exchanges relating to load-frequency control or market-related activities in general are not described in Title II of the SO-GL and therefore not addressed in KORRR. Another example is Article 40 (7) of the SO-GL: Whereas the Guideline says that TSOs and DSOs shall agree on procedures the KORRR proposal consistently speaks of „(to) coordinate ", which is much weaker. • In countries with more than one TSO, it seems not to be cost efficient to use different formats for each control area. BDEW proposes a common format which at least is used by the neighbouring TSOs. If it comes to the necessity of a new format it should be a European one. Scheduled data shall be provided in a uniform dataset and format. • In order to avoid inefficiency, the data provided by the Significant Grid User	No	Clarification to each point: 1. Data exchanges relating service provisions shall be defined at national level, recital (12) has been deleted amended. Related to article 40(7) of SO GL some articles of KORRR have been amended to take into account agreements between TSO and DSO when refers to exchanges between them under article 40(7) of SOGL. 2. KORRR does not prevent TSOs in the same country to agree on a common formats or procedures for the data exchange 3. The KORRR reflects the idea SGUs should be allowed to provide data only to the TSO or to the DSO to which they are connected and then the TSO and the DSO shall exchange between them the data related to those SGU according to article 40(7) of SOGL 4. Reciprocity between TSOs and DSOs is guaranteed by article 3(3) of the new version of KORRR that reflects the wording and intention of article 40 (5) in conjunction with articles 48 to 50 and 53 of SO GL. However those articles of KORRR where exchanges between DSO and TSO should be done under agreement have been amended	BDEW- German Association of Energy and Water Industries

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		(SGU) should be sent only once. The distribution and transmission system operators shall exchange the data among each other. As much of the data is already being sent to the TSO, SGUs should be able to use this way also in the future. Duplicated data provision should be avoided. The same formats for data exchange from the SGUs shall be used. • Changes in the grid of the TSO affect the DSO much stronger than vice versa. Though, the DSO should get at least the same quality and quantity of information from the TSO. The Data exchange between the TSO to DSO should be part of the KORRR proposal and put both system operators on equal footing.			
General		Reicital (13) should be rewritten to:"To ensure the conditions for maintaining operational security throughout the Union as specified in Article 4(1)(d) of Regulation 2017/1485, TSOs need to have good observability of the System in order to perform reliable security analysis. KORRR proposal aims to set the framework **for the TSOs to access necessary data of their respective observability area**." This change is necessary to make clear it is not the task of KORRR to ensure observability, but the methodology stemming from article 75 of (EU) 2017/1485.	Yes	**Accepted.** Recital (13) has been amended	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		Recital (17) should be changed to:"KORRR Proposal will contribute to the efficient operation and development of the electricity transmission system and electricity sector in the Union while having good observability of the system to perform reliable security analysis and thus identifying **necessary** improvements in the Transmission System." As it would be sufficient and efficient to identify necessary improvements instead of possible improvements.	Yes	**Not accepted.** However, Recital (17) has been amended in line with article 4 (1) (h).	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		Recital (18) should be rewritten to:"In conclusion, the KORRR Proposal contributes to the general objectives of the Regulation 2017/1485 to the benefit of consumers." to put consumers at heart of this methodology.	Yes	**Accepted**. Recital (18) has been amended to add consumers	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		Oesterreichs Energie would like to represent the interests of the joint statement of the European DSO associations on the draft "All TSOs' proposal for the Key Organizational Requirements, Roles and Responsibilities (KORRR) relating to Data Exchange". Note, that through delivering the comments, the agreed amendments and additions should be reinforced and corroborated accordingly in the consultation procedure. The last but two sentence of recital (2) need to be changed: "[...] To achieve this goal, it is necessary that each party of the electric system has the necessary observability of the network elements and services with impact in their activities.[...]" to make sure the reference is unambiguous. The last but one sentence of recital two ("Of special relevance is the global demand-generation balance, whose responsibility is assigned to the TSO in Regulation (EC) No 714/2009.") should be deleted completely. The task of global demand-generation balance assigned to TSOs in (EC) 714/2009 refers to the long-term timeframe in the range of the TYNDP. It has no relevance for the timeframe KORRR refers to nor is it subject to Title II of (EU) 2017/1485, to which KORRR is limited. The last sentence of recital (3) ("This complementarity refers to who, how and when the data defined in GLDPM has to be exchanged.") should be deleted. GLDPM already defines who, how and when data has to be exchanged. Cf. e.g. Art. 3(4) (who), art. 4 (how) and art. 16 (when) of GLDPM. If TSOs deem those definitions insufficient they shoud justify any further need. In recital (6), article 40(7) of (EU) 2017/1485 should be cited correctly:"Article 40(7) specifies the obligation for the TSOs to agree with the relevant DSOs on the process for exchanging provision and management of information between them, including, where required for efficient network operation, the provision of data related to distribution systems and SGUs." In recital (7), the last sentence ("The KORRR shall include the method for assessing the relevant of network elements to define the observability area of the	1. Yes 2. Yes 3. Yes 4. Yes 5. Yes 6. No 7. Yes 8. Yes 9. Yes 10. Yes	1. **Accepted.** Recital (2) of whereas section has been amended to clarify the reference to achieve the goal of the SO GL. It also has been updated with a reference to the guideline on electricity balancing that has already entered into force instead of the reference to Regulation (EC) No 714/2009. 2. **Not accepted**. However, the last sentence of recital (3) has been amended to clarify it and also to state that GLDPM only refers to data exchange until day ahead, while KORRR also covers real time data exchange. 3. **Accepted**. Recital (6) has been amended to take into account “agree” word in the text instead “coordinate” 4. **Accepted**. Last sentence of recital (7) has been deleted. 5. **Accepted.** Recital (8) has been amended to take into account first part of article 40 (10) of SO GL. 6.**Not accepted**. Article 4.1.b of the SO GL sets as an objective determining common interconnected system operational principles but the SO GL is not limited to that objective. Thus, application of the KORRR shall not be limited to the data exchanged according to the GLDPM that has been developed according to the CACM. On the other hand, investment done to exchange data according to the GLDPM will allow to exchange that data in the application of the SO GL. 7. **Recital (12) has been amended**. 8. **Accepted.** Recital (13) has been amended 9. **Not accepted.** However, Recital (17) has been amended in line with article 4 (1) (h). 10. **Accepted**. Recital (18) has been amended	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		TSO.") should be deleted. It is not the task of KORRR to include such a method, but the task of the methodology to be developed following art. 75 of (EU) 2017/1485. This is clearly defined in art. 75 (2) of (EU) 2017/1485:"[...]The methods referred to in point (a) of paragraph 1 shall allow the identification of all elements of a TSO's observability area, being grid elements of other TSOs or transmission-connected DSOs, power generating modules or demand facilities.[...]" Recital (8) should be rewritten to:"Article 40(10) specifies the right of DSOs with a connection point to a transmission system to receive the relevant structural, scheduled and real-time information from the relevant TSOs and to gather the relevant structural, scheduled and real- time information from the neighbouring DSOs." to cite the first sentence of art. 40(10) of (EU) 2017/1485 correctly. Recital (11) should be rewritten to:"In the aim to facilitate common operational planning principles as requested by Article 4(1)(b) of Regulation 2017/1485, KORRR Proposal takes into account all data already requested by GLDPM and GLDPM v2 to prepare scenarios to perform operational security analysis in the planning stage. This data is deemed sufficient to fulfill this task". Data necessary for coordinated security analysis and operational planning is already requested by GLDPM and GLDPM v2. If the data set of these two GLDPM-documents is insufficient, data demand going beyond that should be thoroughly justified. Stakeholders already invest in data exchange technologies to facilitate data exchange emanating from GLDPM and GLDPM v2. If data demand is changed by KORRR, stakeholders see the risk of stranded investments. Recital (12) should be rewritten to:"KORRR Proposal includes the organization to exchange, among other, real time data between TSOs, necessary to perform the load-frequency control processes as defined in Article 4(1)(c) of Regulation 2017/1485 and, more specifically, in Article 141(3) of Regulation 2017/1485 for each monitoring area." The only application of real time data and its exchange for load-frequency control processes is the monitoring of real-time active power exchange between monitoring areas (and, consequently, LFC blocks and synchronous areas). Therefore, real-time data exchange for LFC should be limited to this purpose.		to add consumers.	

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Reicital (13) should be rewritten to:"To ensure the conditions for maintaining operational security throughout the Union as specified in Article 4(1)(d) of Regulation 2017/1485, TSOs need to have good observability of the System in order to perform reliable security analysis. KORRR proposal aims to set the framework for the TSOs to access necessary data of their respective observability area." This change is necessary to make clear it is not the task of KORRR to ensure observability, but the methodology stemming from article 75 of (EU) 2017/1485. Recital (17) should be changed to:"KORRR Proposal will contribute to the efficient operation and development of the electricity transmission system and electricity sector in the Union while having good observability of the system to perform reliable security analysis and thus identifying necessary improvements in the Transmission System." As it would be sufficient and efficient to identify necessary improvements instead of possible improvements. Recital (18) should be rewritten to:"In conclusion, the KORRR Proposal contributes to the general objectives of the Regulation 2017/1485 to the benefit of consumers." to put consumers at heart of this methodology.			

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		The draft of the KORRR that is being currently consulted upon does not seem to fulfil the purpose set out for it in the SOGL. Article 40.6 of the SOGL requires a document wherein the TSOs jointly agree on the organization requirements, on the roles and responsibilities that TSOs and others must implement associated with the efficient transfer of data. The list of particulars in SOGL Article 40.6.a through to Article 40.6.g are those aspects that must be considered in creating the requirements for roles, responsibilities and organization requirements. It is not a list of characteristics or criteria that will be implemented outside of the SOGL Article 40.5 or Article 40.7 processes. For example KORRR Article 16 includes specific data characteristics, a three month refresh rate or notification period. This is an intrinsic characteristic of the data and is to be determined under Article 48 of SOGL as modified by Article 40.5.a. In fact the whole of KORRR is more of an addition and commentary on the SOGL data exchange articles of 40 to 53. As such it is adding, inappropriately, detail of the "what" that is to be exchanged rather than the "how". This leads to a lack of clarity about the respective roles of SOGL articles 40-53 and the KORRR, with overlapping requirements on TSOs and other parties. The KORRR should be re-written to focus on issues of co-ordination and management of data exchange, and not on the nature of the data. whereas (6) Article 40(7) of SOGL requires TSOs to agree, not co-ordinate, with the DSOs replace with: Article 40(7) specifies the obligation for the TSOs to coordinate agree with the relevant DSOs on the process for exchanging information between them, including the format of the data exchanges. Whereas (7) The relevance of network elements to the security analysis should be developed in that document, not in the KORRR. In any event it is far from clear that the KORRR achieves this objective	1. Yes 2. Yes 3. No 4. Yes	1. **Accepted**. Recital (6) has been amended to take into account "agree" word in the text instead "coordinate" 2**. Accepted**. Last sentence of recital (7) has been deleted. 3. **Not accepted.** KORRR contributes to setting a common framework for the data exchange for all TSOs as it sets common roles requirements and responsibilities for all relevant TSOs defining how, when and by whom. 4. **Recital (12)** has been amended. It also has to be added, that SO GL already defines "what" information has to be exchanged. In line with that, KORRR does not ask for further data but to define how, when and by whom the data has to be exchanged. The example given of the notification period of 3 months for the structural information is defined in line with article 40.6.f: update of structural information.	Energy Networks Association

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
		Whereas (10) It is not at all clear that KORRR does this. As drafted KORRR suggests some new requirements for the content and timing of data that should instead be developed under Articles 40-53 of the SOGL. From the requirements of SOGL 40.6 the KORRR should explain how the necessary processes will be governed and implemented, ie the how, not the what. Whereas (12) It really is not clear that KORRR does "include the organization" to exchange real time data. It merely restates the SOGL need to do so.			

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		General comments on the matter: In order to fully grasp the potentialities of flexibility of distributed resources connected at distribution level while guaranteeing security and quality of supply, it is key to ensure that DSOs and TSOs cooperate on equal footing in the key processes of the system operation when it comes to dispatch distributed generation. Data exchange is one of the most important aspects of such coordination between DSOs and TSOs in order to ensure an efficient system operation. According to art. 40(10) of Regulation 2017/1485 establishing a System Operation Guideline, DSOs […] shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs and to gather the relevant structural, scheduled and realtime information from the neighboring DSOs. However, we note that the general framework of the KORRR could be improved by ensuring a higher degree of reciprocity between TSOs and DSOs when it comes to define key responsibilities and coordination among them. This lack of reciprocity and proper coordination in the exchange of information could cause the violation of operational constraints on distribution networks and thus could entail consequences in terms of quality of supply for grid users. Therefore, we believe that reciprocity could be enhanced all along the proposed KORRR if the wording "TSOs, in coordination with DSOs" would be replaced by "TSOs, in agreement with DSOs", as to take the utmost account of DSOs opinions. This is in line with the spirit of the System Operation Guideline (art. 40). Furthermore, where TSOs have direct access to scheduled and real-time data from SGUs, such data should be timely shared with DSOs. In addition, in order to guarantee security of supply we believe that the future rules for system operation should adequately reflect at least two principles: - The participation of DSOs to the pre-qualification phase of distributed resources to participate to dispatching markets; - A systematic validation activities of dispatching orders given by TSOs to distributed resources in order to violate operational constraints. In next sections, we laid down our specific comments on the various articles of the KORRR proposal.	No	**Clarification:** Reciprocity between TSOs and DSOs is guaranteed by article 3(3) of the new version of the KORRR that reflects the wording and intention of Article 40(5) read in conjunction with Articles 58 to 50 and 53 of SO GL. The DSO access to the information about the Transmission system and the SGUs connected to distribution network is reflected in articles 5(2), 5(3), 6(7), 8 (3) and 9(5) of new version of the KORRR. Articles of KORRR where exchanges between DSO and TSO should be done under agreement have been amended. Definition of prequalification tests and requirements for service provision are out of scope of the KORRR and shall be define at national level.	Enel

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		The last but two sentence of recital (2) need to be changed: "[...] To achieve **this goal**, it is necessary that each party of the electric system has the necessary observability of the network elements and services with impact in their activities.[...]" to make sure the reference is unambiguous. The last but one sentence of recital two ("Of special relevance is the global demand-generation balance, whose responsibility is assigned to the TSO in Regulation (EC) No 714/2009.") should be deleted completely. The task of global demand-generation balance assigned to TSOs in (EC) 714/2009 refers to the long-term timeframe in the range of the TYNDP. It has no relevance for the timeframe KORRR refers to nor is it subject to Title II of (EU) 2017/1485, to which KORRR is limited.	Yes	**Accepted.** Recital (2) of whereas section has been amended to clarify the reference to achieve the goal of the SO GL. It also has been updated with a reference to the guideline on electricity balancing that has already entered into force instead of the reference to Regulation (EC) No 714/2009.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		The last sentence of recital (3) ("This complementarity refers to who, how and when the data defined in GLDPM has to be exchanged.") should be deleted. GLDPM already defines who, how and when data has to be exchanged. Cf. e.g. Art. 3(4) (who), art. 4 (how) and art. 16 (when) of GLDPM. If TSOs deem those definitions insufficient they shoud justify any further need.	Yes	**Not accepted**. However, the last sentence of recital (3) has been amended to clarify it and also to state that GLDPM only refers to data exchange until day ahead, while KORRR also covers real time data exchange.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		In recital (6), article 40(7) of (EU) 2017/1485 should be cited correctly:"Article 40(7) specifies the obligation for the TSOs **to agree** with the relevant DSOs on the process for exchanging provision and management of information between them, including, where required for efficient network operation, the provision of data related to distribution systems and SGUs."	Yes	**Accepted**. Recital (6) has been amended to take into account “agree” word in the text instead “coordinate”	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		In recital (7), the last sentence ("The KORRR shall include the method for assessing the relevant of network elements to define the observability area of the TSO.") should be deleted. It is not the task of KORRR to include such a method, but the task of the methodology to be developed following art. 75 of (EU) 2017/1485. This is clearly defined in art. 75 (2) of (EU) 2017/1485:"[...]The methods referred to in point (a) of paragraph 1 shall allow the identification of all elements of a TSO's observability area, being grid elements of other TSOs or transmission-connected DSOs, power generating modules or demand facilities.[...]"	Yes	**Accepted**. Last sentence of recital (7) has been deleted.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE

Article	Para-graph	Comment/ Suggestion	Change in KORRR yes/no	Response	Reviewer affiliation
General		Recital (8) should be rewritten to:"**Article 40(10) specifies the right of DSOs with a connection point to a transmission system to receive the relevant structural, scheduled and real-time information from the relevant TSOs and to gather the relevant structural, scheduled and real- time information from the neighbouring DSOs**." to cite the first sentence of art. 40(10) of (EU) 2017/1485 correctly.	Yes	**Accepted.** Recital (8) has been amended to take into account first part of article 40 (10) of SO GL.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		Recital (11) should be rewritten to:"**In the aim to facilitate common operational planning principles as requested by Article 4(1)(b) of Regulation 2017/1485, KORRR Proposal takes into account all data already requested by GLDPM and GLDPM v2 to prepare scenarios to perform operational security analysis in the planning stage. This data is deemed sufficient to fulfill this task**". Data necessary for coordinated security analysis and operational planning is already requested by GLDPM and GLDPM v2. If the data set of these two GLDPM-documents is insufficient, data demand going beyond that should be thoroughly justified. Stakeholders already invest in data exchange technologies to facilitate data exchange emanating from GLDPM and GLDPM v2. If data demand is changed by KORRR, stakeholders see the risk of stranded investments.	No	**Not accepted**. Article 4.1.b of the SO GL sets as an objective determining common interconnected system operational principles but the SO GL is not limited to that objective. Thus, application of the KORRR shall not be limited to the data exchanged according to the GLDPM that has been developed according to the CACM. On the other hand, investment done to exchange data according to the GLDPM will allow to exchange that data in the application of the SO GL.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE
General		Recital (12) should be rewritten to:"KORRR Proposal includes the organization to exchange, among other, real time data between TSOs, necessary to perform the load-frequency control processes as defined in Article 4(1)(c) of Regulation 2017/1485 and, more specifically, in Article 141(3) of Regulation 2017/1485 for each monitoring area." The only application of real time data and its exchange for load-frequency control processes is the monitoring of real-time active power exchange between monitoring areas (and, consequently, LFC blocks and synchronous areas). Therefore, real-time data exchange for LFC should be limited to this purpose.	Yes	**Recital (12)** has been amended.	Oestereichs Energie / Österreichs E-Wirtschaft CEDEC, EDSO for Smart Grids, Eurelectric and GEODE