22st System Operation European Stakeholder Committee (SO ESC)

22 September 2022, 08:00-11:00

Hybrid meeting at ACER Premises

Draft Minutes

Participants		
Georgios	Antonopoulos	ACER
Felipe	Castro Barrigon	European Commission
Eric	Dekinderen	VGB Powertech
Maria	Barroso Gomes	ACER
Mariia	Melnychenko	ACER
Pavla	Erhartova	Europex
Florentien	Benedict	CEDEC
Gunnar	Kaestle	COGEN Europe
Marco	Pasquadibisceglie	ARERA (acting Chair)
Thierry	Vinas	Eurelectric
Mike	Kay	GEODE
Assiet	Aren	CAT
Goran	Drobnjak	GE Gas Power
Freddy	Alcazar	Eugine
Thomas	Holzer	BNetzA
Lisa	Dallinger	BNetzA
Valerie	Reif	FSR, observer
Stefan	Eckstein	EU Solar Turbines
Vidushi	Dembi	WindEurope
Martin	Stoessl	Orgalime
Donia	Peerhossaini	Eurelectric
Michael	Wilch	EDSO for smart grids
Luca	Guenzi	Solar Turbine
Jonathan	Boyer	ENTSO-E/Coreso
Cherry	Yuen	ENTSO-E / Swissgrid
Maja	Lundback	ENTSO-E
Victor	Charbonnier	ENTSO-E
Luca	Ortolano	ENTSO-E / Terna
Gamze	Dogan	ENTSO-E
Daiga	Dege	ENTSO-E
Walter	Sattinger	ENTSO-E/ Swissgrid
Elma	Leto	ENTSO-E
Anna	Butenko	ENTSO-E

1. Opening

1.1. Review of the agenda and approval of minutes

The Chair (Uros Gabrijel) is unavailable today, so Marco Pasquadibisceglie is chairing on his behalf. The Chair (Marco P.) opens the meeting. The agenda is confirmed. The minutes of the last meeting are approved.

COGEN Europe (Gunnar Kaestle) proposes to add a discussion on mandate 581 integration of EVs as small dispatchable loads and its link with the Framework Guideline on Demand Response. Eurelectric (Thierry Vinas) would like to address the Network Code Emergency & Restoration and related implementation. The topics will be discussed in AOB.

1.2. Review of Actions

ENTSO-E (Cherry Yuen) presents the pending actions from previous meeting. All actions were considered done or ongoing.

COGEN Europe (Gunnar Kaestle) asked about the wind eclipse team and would like to know the name of the people involved in this task. ENTSO-E (Cherry Yuen) clarified that as the action has been postponed due to other important obligations, the team has not yet been settled as no experts are available to perform the analysis.

She presents stakeholders feedback received on the SO ESC agenda prior to the meeting. Three questions were raised by COGEN Europe (Gunnar Kaestle):

- Resilience of EU generation infrastructure to weather-related hazards: Fingrid warning, situation of other TSOs?
- High-level update on synchronisation of Ukraine: role of microgrids and small dispatchable loads
- Update on Tmin FCR LER : effect of double hump curve

These questions will be addressed by dedicated speakers.

2. Update on implementation actions at pan EU level

ENTSO-E (Cherry Yuen) presents the updates on the implementation actions.

- CSAm: development of a data collection tool for the methodology on Probabilistic Risk Assessment. The procurement has been launched, and vendors evaluation is ongoing.
- Ukraine-Moldova synchronisation: see topic 6.
- KORRR: analysis on system operation guideline (SO GL) data exchange framework and notably the KORRR methodology, see topic 8.
- SO GL Implementation monitoring: see topic 9.
- SO GL Implementation art.15: report will be published end of September.
- SO GL Implementation art.16: report will be published end of September.
- SO GL Implementation art.17: report will be published end of September.

3. Cybersecurity Network Code (NCCS)

The Chair reminds about the status of the process. ACER had reviewed the proposal submitted by ENTSO-E and the EU DSO Entity to check its consistency with the Framework Guideline and the existing framework on cybersecurity (e.g. Network and Information Security (NIS) Directive). On 14 July 2022, ACER provided its opinion to European Commission. He reminds that the network code is to be adopted as delegated act i.e., no formal comitology process, but with simple consultation of the Member States.

The European Commission (Felipe Castro Barrigon) provides an update on the development of the network code. He explains that DG ENER is consulting Member States authorities. He mentions two specific topics on which DG ENER has requested ACER support: the principles and content of the forthcoming seven methodologies and the overall governance structure (roles and responsibilities of different parties and alignment with existing cybersecurity framework).

He explains the different steps for the adoption of the network code. The current step consists in legal review, inter-service consultation, consultation of Expert Group, cooperation with European Data Protection Supervisor (EDPS), translation, publication Europa, etc. The network code should be finalised by the end of the year but there is a 2+2 month objection period for Council and Parliament.

He mentions the need to ensure complementarity with the forthcoming the NIS 2 Directive in 2023. The Directive will address cross-sector requirements whereas the network code will only address the electricity sector and in particular entities with impact on cross-border flows. A risk assessment will identify in detail which entities and security measures should be concerned. He complements by presenting the governance for cybersecurity risk management.

The Chair asks about the timing of the NC adoption. The European Commission explains this will be done by the end of the year. However, there could be delays considering the efforts spent on the energy crisis management. They are waiting on the legal team to provide their feedback.

COGEN Europe asks clarification on the scope and objectives, and notably the applicability of the code to the gas sector. The European Commission explains that the overarching cybersecurity framework is provided by the NIS Directive which will be revised and cover various infrastructures (gas, electricity, water etc.) considered as critical by The European Commission. The European Commission will make sure that the NCCS does not duplicate nor contradict the NIS2.

4. Report on CGM Implementation

ENTSO-E (Jonathan Boyer) provides an overview of the Common Grid Model (CGM) implementation. He reminds about the five services of the Regional Coordination Centres that are enabled by CGM. He explains the building process, the timeframe, involved parties and related platforms (Operational Planning Data Environment - OPDE).

He reminds the priority focus areas for 2022:

- CGM rotation principle
- Related services: Operational planning coordination (OPC), short -term adequacy (STA), coordinated security analysis (CSA)
- Week-ahead building process and extension to intraday
- File model validation, central authentification solution
- Technical/security issues

and presents the focus areas for 2023:

- Technical/Security
- Week-ahead CGM build process
- Pan-European Verification Function (PEVF) operation > exchange between commercial blocks
- Quality Assurance Service (QAS) operation > quality checks platforms
- OPDE archive
- BMA master data
- STA
- CSA
- OPC
- CCC
- Intraday extension
- File model validation

He presents the roadmap for the migration of the services provided by RCCs in the OPDE.

Assiet Aren asks about the different versions of merging software used for CGM building. ENTSO-E explains that this depends on TSO and RCC in charge of the European merging function (rotational principle). Different tools can be used (TNA, Convergence) but they all ensure the same level of results quality.

Actions:

- ENTSO-E will provide a slide with all the acronyms at the next presentation on this topic
- ENTSO-E will check if the software used by RCCs can be disclosed.

5. Resilience of the EU generation infrastructure to weather-related hazards

ACER (Maria Barroso Gomes) explains the background for ACER to initiate this discussion (Texas freeze 2021 notably). ACER found out that the Network Code Requirements for Generators does not prompt system operators and facility owners to take due account of possible weather hazards and consider them in the design of the underlying assets. The issue is mentioned in ACER policy paper on the grid connection codes amendments including recommendations:

- Historical records or studies are critical to understand the performance at temperature limits
- The regulation could prompt the stakeholders to duly consider the weather hazards impacts on the safety of generation
- Climate parameters could be used in designing transmission and distribution networks and connected power generating modules

CEDEC (Marc Malbrancke) asks if ACER is going to take action to introduce amendments in the code. Regarding weather risks, ACER outlines that the revised Policy Paper does not expect the introduction of new weather resilience requirements for PGMs. Concerning the broader amendment process, ACER explains the context and the timeline for the amendments to the Grid Connection Network Codes and clarifies that following the publication of the revised Policy Paper, a public consultation will be launched which will invite all stakeholders to propose concrete amendments to the codes. The contributions to this public consultation will assist ACER in identifying which amendments will be ultimately proposed.

Eurelectric (Thierry Vinas) explains that climate parameters are already taken into account in generation investment. He asks what the target of ACER is: a common methodology or else? ACER answers that in addressing weather hazards resilience, geographical and technological specificities may be accommodated. Moreover, any potential solution to weather-related risks should respect the principle of proportionality. The Chair explains that the difficulty lies with defining what an extreme weather conditions in different Member States is and reminds that it is very difficult to harmonise because in some areas of Europe heat waves would be the main hazards and in others it would be cold spell. The requirements would therefore depend on the location of each plant.

EU Solar Turbines (Luca Guenzi) asks if the question on weather hazards was focused on emergency condition and if there was any reference to special conditions in the weather hazards analysed. The chair clarifies that it was not a question of emergency but a matter of considering hazards that have immediate and large impact on the power system adequacy.

WindEurope (Vidushi Dembi) asks if there will be another round of consultation on the policy paper. ACER explains that a public consultation will be launched by end of September and invites stakeholders to submit concrete amendment proposals. The policy paper serves as a guide for stakeholders to identify the areas where amendments can be expected; in any case, stakeholders may submit concrete rewording proposals to any article of the network codes.

Orgalime (Martin Stoessl) asks if there are any link with US initiative.

EUGINE (Raju Srinivasa) asks if EUGENE comments to the policy paper were received and taken on-board. ACER explains that following the public consultation, the draft Policy Paper was revised accordingly to address all stakeholders comments and take into account presented views. The evaluation of responses received during the public consultation will be published in a form of a report alongside the final policy paper. EUGINE further asks for OEM to be given more time to react on new requirements.

VGB Powertech (Eric Dekinderen) suggests that there should be a network code for grid operators e.g. impact of frequency thresholds or voltage ranges violation on generators such as a compensation scheme. Study in Germany that explains grid operators did not respect the voltage level for new power plants. There were no damages luckily but if that's the case, there could be a European legislation to cover such case. CEDEC (Marc Malbrancke) suggests that this is already addressed sufficiently by national legislation.

Mike Kay suggests that slides presented in GC ESC are also shared with SO ESC to better understand the process on connection network code amendments.

Action:

- ACER will share the link to the policy paper to be published shortly and the full-fledged public consultation.
- ENTSO-E will provide the slides from GC-ESC on CNC amendments

6. High level update on synchronisation of Ukraine

ENTSO-E (Walter Sattinger) provides an update on the efforts of ENTSO-E and TSOs for synchronising the Ukrainian and Moldavian power system to the Continental Europe power system. He presents the timeline for scaling up commercial exchanges with continental Europe. The connection capacity has stepwise increased from 100 MW in June 2022 to up to 300 MW in high load hours (250 MW in low load hours). The direction of the flows is from Ukraine to Continental Europe.

Eurelectric asks if the direction of the flows may be reversed this Winter. ENTSO-E explains that this is possible, although this scenario is unlikely because the current availability of power plants and system stability in Ukraine is satisfactory, but TSOs will plan for different scenarios. The Chair reminds that there is a strong economical and political dimension, besides the technical challenges. Exports will be a key source of revenues for Ukraine especially in the current situation of energy prices. He further explains that the Ukrainian and Moldovan TSOs have joined the Fskar mechanism which governs inter-TSO settlement scheme for frequency deviations, and that no major issue has been reported until now.

7. BREAK

8. KORRR amendments

ENTSO-E (Cherry Yuen) explains the background to possible amendments to KORRR and the proposed 6 amendments (2 of them being editorial updates, 3 of them being triggered by DSF and the last one being triggered by CACM 2.0). Now we are in the process of stakeholder engagement on the proposed KORRR amendments. Cherry then presented the proposed 4 amendments to SO GL on data exchange (1 being DSF triggered, the others being triggered by CACM). Possible impact on other methodologies is currently under study.

The Chair mentions that the reopening of the connection network codes and of CACM GL has triggered a discussion among ACER/ NRAs/EC about the need to review the SO GL as well. This reopening should only address specific points stemming from CNC and CACM GL revision Namely GLDM provisions, currently stemming from CACM and FCA GL, will be moved into SO GL along with all the provisions about CGM. This will likely lead to amendments to the data exchange framework (with a potential impact on KORRR and to the CGM provisions (with the aim to have a single methodology covering all the timeframes. The current amendments to KORRR aim to reflect this situation.

If the SO ESC members would like to suggest further amendments related to data exchange framework (e.g. linked to the shift of GLDPM in SO GL), these amendment proposals should be transmitted directly to the European Commission. However, the European Commission has already announced a delay in the CACM GL revision process because of the current energy crisis. The chair further explains that a full review of SO GL, EB GL and NC E&R will be anyhow performed at a later stage.

The Chair further states that ENTSO-E should submit their proposed amendments on SO GL as a result of CACM v2.0 to the EC directly for them to take them into account. The next meeting on this topic at ECG (electricity coordination group) level is planned to take place in Q1 2023, though it might be delayed in case more urgent issues pop up in the meanwhile.

CEDEC (Florentien Benedict) asks if the KORRR amendment proposals were consulted already with stakeholders. ENTSO-E explains that the current proposals only reflect ENTSO-E/TSO perspective. CEDEC (Marc Malbrancke) suggests that a bilateral meeting is organised with the EU DSO Entity in accordance with the principles of the MoU signed between ENTSO-E and the EU DSO Entity. ENTSO-E will organise a meeting and share the document with DSOs experts. ACER (Maria Barroso Gomes) expresses ACER's wish for early and close involvement in this project. The chair points out that involving the DSOs is crucial in the process and that a cooperation between TSOs and DSOs is foreseen by SO GL as well.

Action:

- ENTSO-E will organise a bilateral meeting with EU DSO Entity
- ENSTO-E will share the document on KORRR amendments
- ENTSO-E to involve ACER in the KORRR amendment

9. SO GL: ACER implementation monitoring report in SO GL and data exchange; and ENTSO-E comments

ACER (Maria Barroso Gomes) presented the implementation monitoring report, published in July. The report was drafted based on answers from NRAs that were invited to contact their TSOs and inform of the answers submitted. The report shows insufficient uniform implementation. For instance, there is a big difference on the threshold set to determine SGUs for exchanging data.

ENTSO-E (Victor Charbonnier) presented the feedback from ENTSOE on this report. Specific points on standardisation and SGU determination were raised.

ACER (Maria Barroso Gomes) will take those comments into account for future similar exercise. The report is based on the NRA responses (who in turn could have informed their responses from the TSOs) to the survey which may have led to possible inconsistencies in the report.

EU Solar Turbines (Luca Guenzi) asks clarification about the level of divergences between national framework and KORRR. The Chair reminds that the KORRR provides a large flexibility in setting requirements while SO GL provides a minimum level of information details to be provided between TSOs, DSOs and SGUs. ACER (Maria Barroso Gomes) explains that there is a detailed analysis per country in the report.

10. Update on Tmin FCR LER

ENTSO-E (Luca Ortolano) presents the activities performed by TSO and NRAs since May to analyse the root causes for long-lasting extraordinary frequency deviations (LLEFD). More in general, it is important to remind that the rationale behind SO GL requirement of at least 15 min of full FCR activation is because operational experience demonstrates the quantity of reserves is not the only factor explaining the low activation of FRR procured on the market. Technical conditions such as availability in real time and the ability to activate them are equally important parameters.

Eurelectric (Thierry Vinas) asks clarification about the threshold in time for applying requirements to LER installation. The Chair explains the relevant date is the activation of the meter. He asks ENTSO-E to organise a stakeholders' workshop to present the outcomes of the analysis. The Chair strongly supports the request. ENTSO-E will circulate a date.

Action:

- ENTSO-E will organise a stakeholder workshop on Tmin FCR LER

11. AOB

Eurelectric asks for more information about the NC E&R implementation: will the scope of the monitoring be enlarged considering the situation of this winter? ACER will address this question in the next ESC meeting.

COGEN Europe (Gunnar Kaestle) asks if the Framework Guideline on Demand Response will consider the standardisation Mandate M/581 (from Alternative Fuel Infrastructure Directive - AFI): "The standard shall be compatible with specifications for dispatchable loads (such as electric vehicles), which shall be defined in a new stand that mirrors the principles defined by EN 50549." The Chair explains that the comment will be considered by ACER when finalising the framework guideline.

COGEN Europe further asks about the impact of power electronics interface resources on the provision of short-circuit power current and overall system stability.

Next SO ESC meetings:

- In December, online meeting
- In 2023, there will be in person meetings in June and September, and online meetings in March and December. Dates will be circulated in October.

A joint workshop will also be organised with GC ESC in November on RoCoF requirements.