

CONCLUSION DOCUMENT ON AMENDMENT PROPOSAL TO SO GL IN RELATION WITH THE DRAFT NETWORK CODE ON DEMAND RESPONSE

Draft 1 | 24 April 2024

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EXECUTIVE SUMMARY

This document describes the proposals including justifications for the amendment to the Regulation 2017/1485 establishing a guideline on electricity transmission system operation (hereafter SO GL) and to the Key Organisational Requirements, Roles and Responsibilities (hereafter KORRR).

The new Network Code on Demand Response (NC DR) has been drafted in accordance with ACER Framework Guidelines on Demand Response by the Drafting Team of ENTSO-E and the EU DSO Entity together with the Drafting Committee. The NC DR, as drafted today, impacts the SO GL and the KORRR methodology.

The ENTSO-E and EU DSO Entity experts identified necessary amendments to ensure consistency between SO GL and KORRR, and the new NC DR. Those amendments refer to:

- The grid prequalification process of service providing group:

NC DR refers to affected system operators; SO GL had to be reviewed accordingly for consistency.

- The definition of DSO observability area:

The newly defined DSO observability area extends the right of DSOs to obtain data beyond the connection point. SO GL and KORRR had to be reviewed accordingly to remove the limitations regarding the data exchange between TSOs and DSOs.

Grid prequalification of Service providing group

In NC DR art. 75(3) there is a reference, in the grid prequalification process, to the affected system operators.

NC DR – Article 75 – Grid prequalification

[...]

1. Connecting system operators and **affected system operators** shall have the right to perform grid prequalification of SPU, SPG or parts of SPG. A procedure for grid prequalification shall be part of the system operation coordination processes to ensure that the delivery of the balancing or local services does not compromise the safe operation of the grids. This process shall be consistent with the requirements of Article 182 of Commission Regulation (EU) 2017/1485. In SO GL, the prequalification of reserve providing group only refers to connecting and intermediate DSO.

In order to align the referencing in both regulations, the experts recommend amending SO GL art.182(4).

Amendment proposal to SO GL art.182(4)

SO GL – Article 182 – Reserve providing groups or units connected to the DSO grid

The initial text is:

[...]

(4) During the **prequalification of a reserve providing unit or group** connected to its distribution system, **each reserve connecting DSO and each intermediate DSO**, in cooperation with the TSO, shall have the right to set limits to or exclude the delivery of active power reserves located in its distribution system, based on technical reasons such as the geographical location of the reserve providing units and reserve providing groups.

The proposed text is:

[...]

(4) During the **prequalification of a reserve providing unit or group** connected to its distribution system, **each reserve connecting DSO, ~~and~~ each intermediate DSO, and each affected DSO**, in cooperation with the TSO, shall have the right to set limits to or exclude the delivery of active power reserves located in its distribution system, based on technical reasons such as the geographical location of the reserve providing units and reserve providing groups.

Justification of the proposed amendment

This amendment aims at avoiding any inconsistencies between NC DR and SO GL.

Definition of DSO observability area

The NC DR states requirements for the calculation and establishment of 'DSO observability area' as area determining the exchange of data necessary for forecasting and solving congestions. These requirements are established in articles 71, 72 and 76.

NC DR - Article 71 - Principles for the definition of DSO observability area

1. **DSOs in cooperation with TSOs shall jointly develop a proposal for the national criteria to determine the DSO observability areas considering the electrical topology, grid voltages and the standard network configuration.** These criteria shall consider the existing or future scenarios on congestion issues or voltage issues significantly affecting the DSO network.
2. DSO observability area shall identify the scope for which the DSO is entitled to receive information regarding structural, schedule and forecast and, where necessary, real time information about grid elements and system user installations.
3. DSO shall define its DSO observability area and respect the following process considering the national criteria defined in the paragraph 1:
 - (a) each DSO shall assess the potential influence of other system operators; and
 - (b) the other system operators identified in the previous step shall identify the set of their network elements and system users that shall be part of the DSO observability area.
4. DSO observability areas shall be defined initially within one year after the approval of national terms and conditions for TSO-DSO and DSO-DSO coordination. DSO observability areas shall be reassessed every two years after their implementation or at request of the DSO Observability area owner or the affected system operator.
5. All the relevant systems operators shall cooperate in the process of determining DSO observability areas and exchange necessary data.

NC DR - Article 72 - Forecasting and identifying congestion and voltage issues

[...]

3. When conducting forecasts **DSOs shall use the information obtained through the data exchanges pursuant to Articles 76, 79 and 80** (Data exchange between DSOs-DSOs and DSOs-TSO, Data to be provided by service providers of local services and Data to be provided by grid users).

NC DR - Article 76 - Data exchange between DSOs-DSOs and DSOs-TSO

1. **DSOs shall receive information for their DSO observability areas from other relevant DSOs** as defined in Article 71 (Definition of DSO observability area) **and where applicable from the relevant TSOs in addition to the data pursuant to Article 40 (10) of Regulation (EU) 2017/1485**, based on the following categories: [...]

As a consequence of implementation of NC DR articles 71, 72 and 76, DSOs would have the right to obtain data from grid assets and grid users beyond the connection point with other system operators, in line with their observability areas.

Existing requirements in SOGL and KORRR for data exchange between TSOs and DSOs are limited to:

- exchange of data from TSOs to only DSOs connected to transmission,
- exchange of data in the connection point.

Therefore, to ensure consistency between the regulations, the requirements for data exchange between TSOs and DSOs in SO GL and KORRR should be set beyond the connection point.

To that purpose, the experts recommend amending SO GL and KORRR.

Amendment proposal to SO GL art.51(2)

SO GL - Article 51 - Data exchange between TSOs and DSOs concerning significant power generating modules

The initial text is:

(2) Each TSO shall make available to the DSO, to whose distribution system SGUs are connected, the information specified in Articles 48, 49 and 50 as requested by the DSO.

The proposed text is:

(2) Each TSO **or connecting DSOs** shall make available to the DSO, **in line with the DSO observability area defined pursuant to article 71 of NC DR** ~~to whose distribution system SGUs are connected~~, the information specified in Articles 48, 49 and 50 as requested by the DSO.

Justification of the proposed amendment

The proposed amendment aims at removing the limitations in SO GL on the requirements for data exchange between TSOs and DSOs. Additionally, the experts recommend extending the responsibility to provide data, not only to TSOs, but also to the connecting DSOs. This is justified by the availability of the information to both parties.

Amendment proposal to KORRR art.5(3)

KORRR - Article 5 - Access to information

The initial text is:

(3) Unless otherwise provided by the EU or national legislation, the TSOs shall provide DSOs, with a connection point with the transmission system, access to the structural, scheduled and real-time information of the commissioned network elements of the transmission network, in accordance with Article 40(10) of the SO GL, if necessary for carrying out the operational security analyses or for maintaining the operational security of their grids. [...]

The proposed text is:

(3) Unless otherwise provided by the EU or national legislation, the TSOs shall provide DSOs, **whose observability area includes elements of the transmission system** ~~with a connection point with the transmission system~~, access to the structural, scheduled and real-time information of the commissioned network elements of the transmission network, in accordance with Article 40(10) of the SO GL, if necessary for carrying out the operational security analyses or for maintaining the operational security of their grids. [...]

Justification of the proposed amendment

The proposed amendment aims at removing the limitations in KORRR on the requirements for data exchange between TSOs and DSOs.

Amendment proposal to KORRR art.9(5)

KORRR - Article 9 - Responsibilities of TSOs

The initial text is:

(5) Each TSO shall communicate to the DSOs connected to the transmission system their planned and unplanned unavailability of network elements in their connection point. For planned unavailability, they shall agree on the necessary level of coordination and communication between them. For unplanned unavailability, the TSO shall communicate to them as soon as possible.

The proposed text is:

(5) Each TSO shall communicate to the DSOs, **whose observability area includes elements of the transmission system** ~~connected to the transmission system~~ their planned and unplanned unavailability of network elements ~~in their connection point~~. For planned unavailability, they shall agree on the necessary level of coordination and communication between them. For unplanned unavailability, the TSO shall communicate to them as soon as possible.

Justification of the proposed amendment

The proposed amendment aims at removing the limitations in KORRR on the requirements for data exchange between TSOs and DSOs.

Amendment proposal to SO GL art.40(10)

SO GL - Article 40 - Organisation, roles, responsibilities and quality of data exchange

The initial text is:

(10) 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.

The proposed text is:

(10) DSOs with a connection point to a transmission system **and other DSOs whose observability area includes elements of the 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.

Justification of the proposed amendment

The purpose of this amendment is to ensure that the proposed amendment to KORRR art.5(3) will not be limited to DSOs with a connection point to the transmission network.

Amendment proposal to KORRR art.5(2)

KORRR - Article 5 - Access to information

The initial text is:

(2) Each DSO shall have access to the structural, scheduled and real-time information of the SGUs connected to its distribution network.

The proposed text is:

(2) Each DSO shall have access to the structural, scheduled and real-time information of the SGUs connected **within their observability area** ~~to its distribution network~~.

Justification of the proposed amendment

The purpose of this amendment aims at aligning the content of the article to the definition of the DSO observability area and ensure that DSOs have access to the information of SGUs that are part of their observability area.

Amendment proposal to KORRR art.12(2)

KORRR - Article 12 - Rights and responsibilities of DSOs

The initial text is:

(2) Each DSO shall have access to the scheduled data of SGUs connected to its network. DSOs shall comply with the requirements defined by the relevant TSO to exchange scheduled data.

The proposed text is:

(2) Each DSO shall have access to the scheduled data of SGUs connected **within their observability area** ~~to its network~~. DSOs shall comply with the requirements defined by the relevant TSO to exchange scheduled data.

Justification of the proposed amendment

The purpose of this amendment aims at ensuring that DSOs have access to the scheduled data of SGUs that are part of their observability area.