Operational Security Issues Log

Updated: 8 October 2012

Issues numbered 8 to 33 were captured at the JESG OS Technical Workshop on 3 & 4 October.

Issue No	Issue	NGET View
Issues captured at the 3 & 4 October Technical Workshops		
8.	**Article 3(3) – NRA approval process:** Article 3(3) does not provide an appropriate process for public consultation, NRA approval or appeal. Appropriate NRA oversight and public consultation should be the default whenever items in the Network Code are left to be determined at a later stage. Article 3(3) in this Network Code is a watered-down version of Article 4(3) in the final NC RFG and draft NC DCC, and is different to the regulatory approval process in NC CACM.	The NRA approval in the NC OS was changed prior to the consultation during legal drafting, and it is acknowledged that it does not align with those in other Network Codes. Please respond to the consultation with specific comments on how you would like the article revised.
9.	**Nature of requirements:** The Network Code makes repeated use of the term '*endeavour*' for requirements placed on TSOs. In contrast, the NC DCC and NC RFG place specific and binding obligations on Users. Why is there this difference in the nature of the requirements for demand/generation Grid Users vs TSOs?	The NC OS is an operational Network Code therefore it is not always possible to define definitive parameters and obligations when specifying how the system should be operated. The NC DCC and NC RFG deal primarily with design capability of demand and generation facilities to be connected to the system, and therefore more specific design parameters are appropriate. Areas where the requirement in the NC OS can either be strengthened for the TSOs or relaxed for industry parties should be raised through the ENTSO-E consultation.
10.	**Justification for requirements:** Where there is a deviation from current practice, ENTSO-E is required to provide a cost benefit analysis demonstrating why the requirement has been chosen to ensure they are proportionate. These have not been provided. Specific areas where the requirements are considering disproportionate or potentially prohibitive are in Issues 0-0, 28 and 30.	Justification is provided in part in the supporting paper; further justification is expected to be provided as the Code is finalised. Specific areas where obligations are felt disproportionate should be fed back through the Consultation.
11.	**Requirements on small generators.** The provision of real-time and forecast data from Type B and C generators with embedded DSO connections at 1MW and above. Clarification that according to the RfG code any generator connected at 110kV or above is type D.	See Issue 10 Believe the intent is obligation is on Significant Grid Users and which are type B or C. RfG code definition of type D being all transmission connected irrespective of size hinges on whether any European system includes transmission facilities at <110kV. Please feedback concerns in Consultation document.

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12.	**Domestic Demand Side Response.** As the NC DCC provides a capability for demand side response to be provided by domestic customers, the impact of placing obligations on Demand Facilities in this Network Code need to be verified to ensure it is proportionate.	See Issue 10
13.	**Data Requirements.** The TSOs may require various elements of data from DSOs and grid users; these requirements are not justified.	See Issue 10
14.	**Proportionality of Requirements on DSOs.** There are a number of requirements placed on DSOs by the Network Code; however, these are felt to be disproportionate and unfunded. It is not clear if DSOs could meet with requirements in the Network Code without large investment.	See Issue 10
15.	**Applicability – Significant Grid Users.** As the Network Code is written to apply to 'significant grid users' and what constitutes a significant grid user is for TSOs to determine after the entry into force of the Network Code (Article 6(11)), it is very difficult to ascertain who is impacted by this Network Code.	Who is a 'Significant Grid User' may change over time as system conditions change, and will be defined in accordance with the process established in the Network Code. NGET initially expects 'Significant Grid Users' to be those currently affected by the Grid Code for data provision; however, this may change in light of current workgroups eg. on providing information from embedded generation.
16.	**Applicability - All Grid Users.** The drafting needs to be tightened to ensure that it does not place undue obligations on parties by using terms such as 'Demand Facilities', 'Power Generating Facilities' and 'All Grid Users', which covers everyone rather than those deemed significant.	It is not believed that this term should be used in this Network Code; the drafting needs to be improved.
17.	**Lack of technical detail/parameters.** The Network Code is lacking in specific technical parameters and specifies that these will be determined later by the TSOs. In general the requirements in the Network Code are somewhat vague compared to GB Network Codes.	The intent of the NC OS was to provide an 'umbrella' code for harmonisation of principles, NGET would see parameters such as those for voltage and frequency, if defined in the Network Code, to be the same as those currently in GB frameworks such as the SQSS and Grid Code. Certain parameters such as the thermal ratings and short circuit ratings may not be appropriate to be codified in this manner due to their being circuit and asset specific.
18.	**ACER requirement for further detail.** ACER wrote to ENTSO-E on 30 August stating that the Network Code as currently drafted did not meet the Framework Guidelines, due to an absence of Performance Indicators. These will need to be added post-consultation and hence the public will not have the opportunity to comment upon them.	The letter was too late to be considered prior to the consultation period drafting. Future development of the Network Code will be subject to the process specified in the regulations and as agreed between ACER, ENTSO-E and the Commission. It does not presently allow for a second consultation.
19.	**Terminology:** In specifying requirements, the Network Code uses it a unique definition of 'Significant Grid User', but also refers to the generator types from the RFG, and units which are 'relevant for Operational Security". It is not clear how all of these definitions interact and whether they are consistent.	The definition of Significant Grid User is unique to this code. The applicability of the Network Code shall need to be clarified to ensure that that intent is reflected in the final drafting.

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20.	**Terminology.** The use of various terms such as Control Area, Responsibility Area and Observability Area need to be checked to ensure the obligations are being placed on the parties who can actually deliver the requirement.	The applicability of the Network Code shall need to be revised to ensure that that intent is reflected in the drafting. It is believed that Control Area = Responsibility area, this needs to be considered in the final drafting.
21.	**Consistency / duplication.** Each Network Code will have the same legal status; therefore there can not be duplication of requirements between Network Codes. Various terms and processes are used in various Network Codes with different meanings e.g. Common Grid Model and Remedial Actions are both defined in NC CACM; data exchange is also defined in CACM, Remit and Transparency regulations.	There is a need to improve the referencing and interactions between Network Codes.
22.	**Interaction with Future Network Codes:** If market aspects are not defined in the NC OS, but are expected to be covered in the future NC Balancing, then this needs to be referenced in the NC OS.	There is a need to improve the referencing and interactions between Network Codes.
23.	**NC RFG – Retrospectivity.** Various elements of the NC OS refer to generators being obliged to meet the obligation of the NC RFG. The NC RFG does not be default apply to existing generators, whereas the NC OS does. It is not clear how this interaction works for existing generators not covered by the NC RFG.	The drafting needs to be tightened to reflect the intent. It is not intended to require parties to comply with the NC RFG unless they are already required to do so.
24.	**Different definition of Significant Grid User.** The term is used repeatedly across the Network Codes although the definition and hence who is captured as a Significant Grid User varies between the codes. Common definitions are required to ensure common obligations.	It is likely that what constitutes a Significant User for Operational Security (eg provision of data) will be different from that for the other Codes which deal with design capability. Therefore, different thresholds may need to be applied. It is acknowledged that this can lead to confusion amongst parties. Specific comments on how this issue could be addressed should be fed back through the consultation tool.
25.	**Capabilities.** The NC OS specifies requirements based on capabilities defined in other Network Codes (for example the NC DCC). It needs to be assured that requirements for system operation are compatible with the capability of plant provided under the other Network Codes.	The requirements in the OS Network Code shall need to be compared for consistency against the other Network Codes when they are finalised. Specific comments should be fed back through the Consultation tool.
26.	**Redispatch (Article 10(6-9)).** From the drafting it is not clear how the TSO redispatch allowed in Article 10 interacts with the NC Balancing and how this redispatch will be used. Redispatch is a defined term in the NC while Dispatch is not.	There is a need to improve the referencing and interactions between Network Codes and in particular the Balancing Code once it enters drafting.
27.	**Dispute Resolution.** No mechanism is provided in the Network Code for resolving disputes between two or more parties that are required to agree or cooperate.	Please feed back any specific suggestions you might have on this issue.
28.	**Resynchronisation (Article 11(20)).** The process defined in this article is unworkable, and places unachievable obligations on generators and DSOs.	The article is we consider intended to apply in an emergency situation, however, we acknowledge this is not clear. The drafting needs to be improved to match the intent and how this would actually work in practice including process and timing.

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29.	**Minimum % of synchronous generation (Article 13(4))** A percentage of synchronous generation may be too simplistic as it does not recognise the range of inertia provided by different synchronous plant.	It is agreed that this Article needs some refinement to make it more generic. Please make specific suggestions via the Consultation tool.
30.	**Testing obligations.** Article 14(11) does not specify how often such testing may be requested, whether this constitutes an obligation upon Users and who should pay for it. If mandatory there needs to be an appeal regime where testing becomes too onerous.	Please make specific suggestions via the Consultation tool.
31.	**Alert Status.** Article 6(7) requires the TSO to communicate entry into an Emergency state to Users; consideration to be given to communicating 'Alert' status too as this would mean suspension of testing as under article 14(12).	'Alert' status is usually triggered by a secured event and is very rarely followed by any further system degradation since this would usually be triggered by a specific further contingent event. However, please advise via the Consultation tool.
32.	**Data Aggregation.** Under article 10(12), who aggregates data submitted to the TSO?	Not clear in drafting; but unlikely to be possible by any party other than DSO.
33.	**Expansive Actions.** Under article 11(2) for contingency handling & analysis – no definition of what an expansive action would be.	Intent of drafting is to clarify TSO duties. Please make specific suggestions via the Consultation tool for improvements to wording.
Issues captured prior to the JESG Technical Workshop		
1.	Draft 1 of the Op Security NC suggests that embedded generators >1MW need permission of TSO before can reconnect after a trip, and Demand sites need to inform TSO of any changes to their facilities – this is not realistic	The draft is an early version, this cross references to Gen types from RfG NC were a late edit into the draft NC so have not been fully discussed in the drafting team. We would anticipate several areas of the draft NC including these ones will change.
2.	What is the changes for GB, what is the cost benefits	When the Network Code is further developed we will also have a position paper which should provide justification / cost benefit for new obligations in the OS NC. NGET will produce a summary of existing Grid Code obligations compared to new obligations under this NC.
3.	What is the linkage between this Op Security NC and the other Operational NC	ACER have suggested that the other NCs being drafted under the FWGL for System Operation (Op Planning and Freq Control) should be developed and consulted upon all at the same time.
4.	Relating to the Minutes of the ENTSO-E Workshop with the DSOs Technical Expert Group (20 April 2012), what is meant by 'must-run synchronous generations' in A1 on Page 3.	The issue was raised by a DSO at workshop #1: what is the minimum level of synchronous generation that can be allowed, to ensure minimum system inertia and stability are ensured? The drafting team reflected on this comment and decided that this requirement should have been addressed in the Network Code. The next draft of the Op Security NC which will be released ahead of workshop #2 on 2/7/12 will contain a clause requiring 'each TSO to specify the minimum % of synchronous generation required at any time to maintain system stability, the methodology to determine the levels shall be defined and agreed by ENTSO-E for each synchronous area.'

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5.	Do the requirements of the Network Code apply to AC or DC cross-border interconnections?	The draft OS NC is not specific on AC or DC, so obligations regarding interconnections would therefore apply to both AC or DC.
6.	The methodology to determine the minimum percentage of synchronous generation to enable stability and security required in a synchronous area should be subject to consultation and NRA approval.	No strong views. National Grid already has an obligation under the GB SQSS to ensure the system is operated to ensure angular stability and frequency stability, this methodology would be one of many inputs into ensuring stability of operations.
7.	There could potentially be multiple definitions / criteria of a 'significant user' in the RFG, DCC and OS Network Codes. Can a different terminology be used.	The term significant does require consistency across the Network Codes, before they are finalised.