

JESG Issue Log for the Emergency and Restoration Network Code

Last Updated: 19 January 2015

This is an update to the document published on 14 November 2014 and contains the following risks that were captured as a result of technical workshop help on 9th January 2015. All article references refer to the 13 October 2014 version issued for public consultation with the exception of the points added at the January workshop (ID 23, 26 and 27) for which the article references refer to the “*Addendum replacing Article 13 and Chapter 4 of the ENTSO-E Working Draft Network Code on Emergency and Restoration released on the 13 October 2014*” issued for public consultation on 15 December 2014.

This is a summary of the key issues raised by GB stakeholder at the workshop. It is not a detailed issue log capturing all the details discussed.

ID	Topic	Description	Article Reference
1.	Scope of the Code	The Network Codes seems to lack the scope and scale envisaged by the Framework Guidelines as it reads as a framework for individual TSO plans, rather than a pan-European plan.	General
2.	Appeals and Derogations	There is no process for an affected party to appeal against a decision or seek a derogation from the obligations. The Network Code should include a derogation process akin to that in RFG/DCC.	General
3.	Critical national Infrastructure	An article is possibly required to allow certain information to be withheld in the interests of protecting the Critical National infrastructure.	General
4.	When the Code applies	It is not always clear when the Code applies. Is it during an Emergency or Restoration state, or as written it could apply at other times. The wording needs to be tightened.	General
5.	Scope of Stakeholders	The definition of parties to be consulted under the Network Code needs to be sufficient to capture all of the potential stakeholders, including those more specific to GB such as Elexon.	Recital (4)
6.	Scope: Distribution / Transmission	Refers to Transmission system only, when there is a clear link to the distribution system. This should be consistent with the other Network Codes.	Article 1(2)
7.	GB TSOs	A query over arrangements in GB with regard to the multiple TSOs, and in particular the role of the Scottish TOs and NETSO in the implementation of any defence plans and restoration plan.	Article 1(4)
8.	Definition of Significant Grid User	The definition of Significant Grid User is used and this has different meanings in various Network Codes. Question of whether this is an appropriate legal formulation and whether it is usable for stakeholders.	Article 1(6)
9.	Significant Grid User – Domestic Demand	The use of ‘Significant Demand User’ based on the reference to the Demand Connection Code encompasses domestic consumers providing DSR. This seems onerous and has consequences for the rest of the Code.	Article 1(6)
10.	Definitions are inconsistent and incomplete	Concerns about the definitions, in particularly: <ul style="list-style-type: none"> • <i>Demand</i> is different to the Operational Handbook (but oddly not defined elsewhere) • <i>Restoration Plan</i> – seems odd to be defined as only the ‘summary’ • <i>Defence Plan</i> – Definition missing. 	Article 2
11.	Areas lacking specific requirements	A number of Articles seems to lack any clearly defined obligations, and are more a statement of intent more akin to a recital	e.g. Article 3

ID	Topic	Description	Article Reference
12.	Consultation and Coordination	All items subject to TSO decisions after the Code has entered in to force should be subject to (broad) public consultation and NRA approval. The process in Article 5 is not sufficient to cover the required process.	Article 5
13.	Agreements with TSOs not bound by the Code	Timescales for implementation seems long, and a process open ended. Although not expected to be an issue for GB in this particular article as designed for the Baltic region.	Article 7
14.	Current or Future scope	As written the article is unclear where it is looking at the current capability, or the future capability of Significant Grid Users or new Type A Power generating Modules	Article 8(4) Article 20(4)
15.	Timescales	There are no timescales for the implementation of the System Defence Plan and the System Development Plan There is no requirements for a regular and transparent review of the plans that are put in place.	Article 9 Article 47
16.	Type A generators	There are obligations on Type A generators in this Network Code that would appear, due to the volume of Type A generators, to be very onerous to comply with, e.g. <ul style="list-style-type: none"> • Notification of system defence plan • Information exchange, tools and facilities (Chapter 5) Any requirements on Type A generators need to be very carefully considered.	Article 9(2)a Article 9(3) Article 37-39
17.	Notification	Market Parties, NRA and member states need to be made aware of the state of the system (e.g. when an emergency state is reached, or a defence or restoration plan is enacted)	Article 10, Article 22
18.	Activation of plans	There needs to be a form of words found so that when defence and restoration plans are enacted, the generators/demand can reject the instruction if they are not technically feasible to be enacted. There is something existing in the Grid Code	Article 10(1) Article 22(1)
19.	Practical Issues	Many practical issues highlighted in the code, particularly around contacting, providing information to, or instructing generators / demand. A particular issue for passively managed Type A generators or domestic customers.	Article 10 (2) Article 22(2)
20.	GB multiple TSO regime	Unclear how the definitions of TSOs and Interconnectors work for the GB regime, where our merchant interconnectors are certified TSOs, and we have multiple TSOs.	Article 11 Article 37(2) and elsewhere
21.	Cessation of Active Power	Article 12(4) gives details of ceasing active power. There are a number of issues. <ul style="list-style-type: none"> • Article 8(1)(f) of RFG only provides for a logic port on Type A generators it doesn't propose how it will be used. This is subject to an Article 4(3) process in the RFG. NC ER presupposes that it must be used. • The counter-instruction, to allow active power to provide provided again, is not detailed. 	Article 12(4)
22.	Under frequency deviation	<ul style="list-style-type: none"> • Need for a link to LFCR to define what is meant by Under-frequency, otherwise can be interpreted as anything less than 50Hz, but within operational limits. • The money flows for activating DSR are not specified • If DSR is activated how will this affect the settlement prices • Queries over whether this is automatic DSR or manually activated DSR • Why is modification to demand seen as the only solution to under-frequency? Reducing generation can have the same effect, and in GB we would use either demand or generation control in merit order. 	Article 12(5)

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23.	Automatic low Frequency control scheme (following separate workshop on 9 th January 2015)	<p>The GB value in the “Demand disconnection ending mandatory level” field is currently 50%. In order to better align with the value provided in the Grid Code for England and Wales, this should be modified to 60% (i.e. the same as for Ireland).</p> <p>Article 13 (8) sets out obligations on DSOs in relation to LF Demand Disconnection and we have to ensure that GB DNOs are comfortable with this, as well as the interaction with the TSO, bearing in mind existing obligations in the Grid Code.</p>	<p>Article 13 (4) - Table 1</p> <p>Article 13 (8)</p>
24.	Potential costly areas for GB implementation	<p>We do not currently have the following areas, and so they may be costly to implement for limited benefit</p> <ul style="list-style-type: none"> • automatic high frequency control scheme within the system defence plan • automatic scheme against voltage collapse within the System Defence plan. 	<p>Article 14</p> <p>Article 16</p>
25.	Automatic high Frequency Control scheme	<p>Why is modification to generation seen as the only solution to under-frequency?. Increasing demand (such as pumped storage) can have the same effect, and in GB we would use either demand or generation control in merit order.</p>	<p>Article 14</p>
26.	<p>Market Interactions (following separate workshop on 9th January 2015)</p> <p>General points</p>	<p>NCER may not be the ideal code in which to cover this topic – CACM and NCEB may have been more relevant and this needs to be considered in terms of stakeholder engagement (i.e. the ENTSO-E “3 Committees” model).</p> <p>Whilst GB market suspension arrangements are fairly transparent (i.e. automatic triggers / limits for when market is suspended), there is concern that the code provides too much flexibility for TSOs (i.e. in other Member States) in relation to when the market would be suspended which would impact GB market participants who trade on a cross-border basis.</p>	<p>Chapter 4</p>
27.	<p>Market Interactions (following separate workshop on 9th January 2015)</p> <p>Article-specific points</p>	<p>A period of time should be established (e.g. 1 hour) following time when trigger was first breached, but before market is suspended, to allow possible immediate resolution.</p> <p>The code states that the system must be in an Emergency State for the market to be suspended. However, it is not clear whether a market should be suspended, even if its system is not in an Emergency State, in the event that cross-border capability with a neighbouring system that is in an Emergency State is significantly affected (i.e. this is a trigger that must be considered under Article 2).</p> <p>The words “each TSO shall be entitled to” should be replaced by “shall” (see general point above).</p> <p>Market Restoration triggers should not be the same as Market Suspension triggers as it is important that system is completely stable. Also, NRA approval (where practical) should be included as a new bullet 5(1)(e).</p> <p>The Communications Procedure should be agreed up-front and approved by the NRA.</p> <p>The words “In case of an Emergency State” should be replaced by “In the case of an Emergency State where market suspension triggers are not met”.</p>	<p>Article 2 (3)</p> <p>Article 3 (1)</p> <p>Article 3 (1)</p> <p>Article 5 (1)</p> <p>Article 6 (1)</p> <p>Article 7 (1)</p>

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28.	Information Exchange	There should be principle of recording this information, to enable post-event analysis	Article 37(2)
29.	Information Exchange – publication of information	Linked to the market suspension, the list of parties to be notified of an Emergency, Blackout or Restoration state seems to limited and vague in process. GB market participants for example would want to be aware of an issue in France to allow them to trade their cross border position.	Article 37(4)
30.	Compliance and Review	<p>The timescales for undertaking the compliance testing are potentially too onerous and without justification.</p> <p>There should be a minimum standard, and then a national choice to allow a reasonable choice.</p> <p>There is no indication of who pays for any of the compliance activities.</p> <p>Article 41(2) where it refers to “after any modernisation of equipment” may cause retrospective application of requirements to Type C and D generators.</p>	Article 40-49
31.	Implementation (Chapter 7)	<p>These Articles add little more information than already contained in the 3rd package regulation.</p> <p>The stakeholder advisory group should be open like a GB Code panel, and not an ENTSO-E function.</p> <p>There should also be a number of different groups to cover the different types of codes</p>	Article 50- 51