



Energy for
generations

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Load-Frequency Control and Reserves Network Code

ESB welcomes the opportunity to provide comments on the final draft of ENTSO-E's text of the Load-Frequency Control and Reserves (LFCR) Network Code.

ESB is a vertically integrated utility in the Irish Single Electricity Market (SEM), with a significant and growing generation portfolio in the GB market. Our portfolio lies across coal, CCGT and wind plant, with an interest also in ocean energy and other developing renewable technologies.

We support the development of the Internal Energy Market, but feel there are a number of areas within the LFCR Network Code which could be improved and as such would welcome these points being considered in ACER's formal Opinion.

Comments:

- We welcome increased regulatory oversight throughout the document, but believe that it would be beneficial if this were extended to the following Articles:
 - o Art 43(4)
 - o Art 43(5)
- There should be a route to appeal for those Reserve Providers excluded from participation by the TSO. Regulatory oversight is currently included, but the representation of Providers whose route to market has been removed – and who are therefore commercially impacted – should also be codified. Articles affected:
 - o Art 44(3)
 - o Art 47(4)
 - o Art 49(4).
- Equally, DSO-connected participants also need an appeal route and involvement in the process should they be excluded from participation by the DSO and/or TSO. Articles 68(3) and 68(4) are affected; these clauses should also be covered by NRA oversight under Article 4(2).
- Art 29 should include consultation with stakeholders, and a route for appeal, in relation to recommendations and mitigation measures suggested by TSOs, to ensure there is no undue commercial impact on or discrimination against Providers.

Should you have any queries or wish for any clarification my contact details are below.

Yours Sincerely,

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