



ACER
Trg republike 3,
SI - 1000 LJUBLJANA

Brussels, 8 August 2013

By email to LFCR_NC@acer.europa.eu

DSO Associations' Comments on the ENTSO-E Draft Load Frequency Control & Reserves Network Code (Version of 28 June 2013)

Dear Madam, dear Sir,

DSO associations welcome the opportunity to respond to ACER's invitation to express views on the last draft of the Network Code on Load-Frequency Control and Reserves (NC LFCR).

The NC LFCR enables users connected to distribution networks to provide reserves to the TSO. In this respect, it is crucial that the code puts in place procedures allowing DSOs to maintain operational security in their networks. In our response to the ENTSO-E public consultation we highlighted that, if DSOs are only entitled to evaluate the provision of the service in a pre-qualification stage, this could be very restrictive for the aggregation of small units entering the market.

We acknowledge that ENTSO-E has made a welcome change to the network code: allowing DSOs 'to set temporary limits at any point in time before reserve activation' (art. 68.4.), as proposed in the new draft, gives room for a more active and flexible approach. We also welcome the fact that the code now takes into account the need to respect DSOs that may be placed in-between the TSO and a 'Reserve Connecting' DSO in these processes.

However, the code still advocates real-time communication channels for units providing Frequency Containment Reserves (FCR), Frequency Restoration Reserves (FRR), and Replacement Reserves (RR) (art. 44, 47 and 49) – although such channels are already set for them in the Network Code on Operational Security (NC OS, art. 20 & 26), which considers such units as Significant Grid Users (art. 1 NC OS).

We believe that the draft should be clarified to avoid misinterpretation that could lead to inefficient duplication of communication channels. The NC LFCR should explicitly refer to relevant requirements of the NC OS.

We encourage the Agency to take these views into account in preparation of its reasoned opinion on the code. Should you have any questions, please do not hesitate to contact

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Yours sincerely

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