

## Enel comments on LFCR NC draft (28 June 2013 version)

### Article 68 Paragraph 1

TSOs and DSOs shall collaborate and use reasonable endeavours to facilitate and enable the delivery of Active Power Reserves by Reserve Providing Groups or Reserve Providing Units located in Distribution Networks.

*Comment: The expression "reasonable endeavours" should be modified and specified, since it is not appropriate for a legal text*

### Article 68 Paragraph 3

During the Prequalification of a Reserve Providing Unit or Reserve Providing Group connected to its Distribution Network and in accordance with applicable legislation each Reserve Connecting DSO and each intermediate DSO shall have the right to set limits to or exclude the delivery of Active Power Reserves located in its Distribution Network in cooperation with the TSO and in a non-discriminatory and transparent way based on technical arguments such as the geographical distribution of the Reserve Providing Units and Reserve Providing Groups.

*Comment: The reference to "technical arguments" is very vague. The DSO should have the right to set limits if the quality of supply or the security of Distribution Networks is endangered as well.*

### Article 68 Paragraph 4

In accordance with applicable legislation each Reserve Connecting DSO and each intermediate DSO shall have the right to set temporary limits at any point in time before reserve activation in cooperation with the TSO and in a non-discriminatory and transparent way to the delivery of Active Power Reserves located in its Distribution Network. The respective TSOs shall agree with its Reserve Connecting DSOs and intermediate DSOs on the applicable procedures.

*Text proposal to be added just after the underlined sentence: For the case of a restriction in real-time or a forecasted restriction of the delivery from a Reserve Providing Unit or Reserve Providing Group the Reserve Connecting DSO shall make best efforts to inform the relevant Reserve Provider as in advance as possible*

### Comments on articles 44, 47 and 49 about real time communication channel

The Code still advocates a duplication of real time communication channels for those units providing FCR, FRR, and RR. Since, according to article 1 of NC OS, reserve providing units will be always significant grid users, real time communication channels are already set for them in the NC OS. Therefore reference should be made to it in the NC LFCR for this communication requirements, in order to avoid no duplication of channels. To this respect, the NC doesn't mention (in Art. 34) how FRR is activated, when the reserve providers are connected to distribution networks. To avoid duplication of communication channels this task should be carried out by the Reserve connecting DSO.

### Comments on article 28 about ramp restrictions

The text allows TSO to define ramp restrictions to generators. Ramp restrictions have implications in the market and imply a cost to the generator. Moreover these restrictions are not the only measure to be taken in case the LFC Block was not fulfilling the FRCE Target Parameters.

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