REPORT ON THE PUBLIC CONSULTATION ON THE TEST PLAN IN THE FRAMEWORK OF THE NETWORK CODE ON EMERGENCY AND RESTORATION

Proposal following the NC ER Art. 4(2), Art. 4(3) and Art. 43

November 2019

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1. Introduction

From the 14th of October 2019 until the 14th of November 2019, Elia organized a public consultation on the Test Plan drafted in the framework of the Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration (NC ER).

This report aims at gathering the consultation's comments received and presenting Elia's vision on these consultation's comments.

This formal public consultation has been preceded by stakeholder's debates. These debates gave all parties the opportunity to present their comments and raise their concerns related to the proposed Test Plan. The proposal subject to public consultation already include the result of these discussions.

According to Article 4(2) and Article 4(3) of the NC ER and Article 259 of the Royal Decree of 22 April 2019 establishing a grid code governing operation of and access to the electricity transmission system, the Test Plan has to be submitted by 18 December 2019 to the Minister of energy for approbation.

The present report will present the feedback received in section 2 and discuss this feedback in Section 3.

2. Feedback received

At the end of the consultation period on 14 November 2019, Elia received comments on the proposed Test Plan from the following market parties:

- Febeliec
- Febeg

The responses have been indicated as non-confidential. They are included in Annex I of this report and will also be made available on the Elia website, together with this consultation report.

3. Discussion on the received feedback

All received comments have been analysed. Elia summarized and structured the reactions received and answered to the reactions in this section. The original reactions are included in Appendix 1 of this report and are also available on the website of Elia.

3.1. General

3.1.1. Received comment

"On the test plan, Febeliec urges Elia to either publish the list of concerned SGUs or make sure that those SGUs are duly and correctly informed of their (exhaustive) obligations under this test plan."

3.1.2. Elia vision

The list of SGUs has been submitted to the Minister of Energy together with the System Defence Plan and the Restoration Plan. The SGUs will be informed individually of the obligations after the approval.

Despite this aspect, SGUs have, according to this proposal of the Test Plan no test obligations except if they have a contract with Elia to provide Black Start Services or if they are involved in LFDD relays test when used for load shedding.

3.1.3. Impact on the document

The comment has no impact on the Test Plan.

3.2. Section 5: Compliance testing of demand facilities providing demand side response

3.2.1. Received comment

"Febeliec understands from the document that currently no measures are included for defence service providers delivering demand response and demand response low frequency demand disconnection (LFDD), but asks that if any future version would contain any such measure, those will be preliminarily discussed with the grid users in the relevant working groups of the Elia Users' Group. "

3.2.2. Elia vision

In case Elia sees a need to foresee measures in the System Defence Plan to be executed by defence service providers delivering demand response and/or demand response low frequency demand disconnection, Elia will submit a new version of the System Defence Plan for approval to the Minister of Energy as stipulated in the Federal Grid Code and in Article 50(5) of NC ER.

According to Article 50(5) and Article 11 of the NC ER, the new version of the System Defence Plan will be designed in consultation with, among others, relevant DSOs and SGUs.

Furthermore, as indicated in the current version of the Test Plan, in case future versions of the System Defence Plan rely on measures from DSPs delivering demand response LFDD, a dedicated test will be developed in concertation with the stakeholders and taking into account the minimum requirements laid down in Article 45(2) of the NC ER and Article 37(4) of the NC DCC. In that case, a new version of the Test Plan will be submitted for approval.

3.2.3. Impact on the document

This comment has no impact on the Test Plan.

3.3. Section 5.2: Defence Service Providers delivering demand response low frequency demand disconnection

3.3.1. Received comment

"With respect to article 5.2, Febeliec would like to see the text and title reviewed in order not to refer to demand response but rather load shedding, as the low frequency demand disconnection will not be a voluntary demand response service, but an obligatory, involuntary and non-remunerated load shedding. This would also make clear the distinction between article 5.1 and 5.2."

3.3.2. Elia vision

Elia is constrained to use the wording indicated in the NC ER in its Test Plan.

Furthermore, Elia would like to remind that a distinction exists between the low frequency demand disconnection (LFDD) executed by a Defence Service Provider (DSP) and the LFDD executed by the TSO/DSOs by means of LFDD relays on their installations (load shedding).

According to Elia, a DSP executing LFDD will do it on a contractual basis or based on a legal obligation with LFDD relays installed on its installation. Furthermore, depending on the contractual terms or legal obligation, the frequency threshold could be different than the first frequency threshold considered for the load shedding plan (49 Hz).

The defence services elaborated in section 5.1 and 5.2 of the Test Plan are both delivered on a voluntary basis or are both resulting from a legal obligation. In section 5.1, the DSP is supposed to modify its offtake following a request from the TSO but is à priori not disconnected from the transmission grid. Section 5.2 deals with a full or partial disconnection of the DSP installation if the frequency drops below a certain threshold.

Elia would like to remind that the current version of the System Defence Plan does not include measures to be executed by a DSP and that if Elia intends to include such measures in future versions of the System Defence Plan, stakeholders will be consulted in advance during the design phase.

3.3.3. Impact on the document

The comment has no impact on the Test Plan.

3.4. Section 7.1: Compliance testing of low frequency demand disconnection (LFDD) relays - Introduction

3.4.1. Received comments

"Febeliec would like Elia to bring clarity on the status of the CDSO, as the first alinea refers to each DSO whereas the third alinea also includes the CDSOs, leading to confusion on which obligations are imposed to the CDSOs."

"We [FEBEG] *understand that the tests of LFDD relays concerns only LFDD relays implemented on the installations of the DSOs or TSO, not on installations of grid users. Can Elia confirm our understanding, and if LFDD relays are implemented on TSO installations connecting grid users (transmission-connected demand facilities)?"*

3.4.2. Elia vision

In response to these comments, Elia would like to clarify the applicability of tests to be executed on LFDD relays on installation of:

- CDSO
- DSP

CDSO

Currently CDSO are not involved in the LFDD plan. However, if a CDSO would be adopted in a future plan, LFDD relays installed on their installation would be subject to a similar test. The potential inclusion of a CDSO in a future LFDD plan will in any case be discussed in advance with the relevant stakeholders.

DSP

According to the NC ER, LFDD relays can be tested in two different situations:

1. In the context of a LFDD test for defence service providers delivering demand response based on LFDD (Article 45(2) of the NC ER)
2. In the context of LFDD relays implemented on TSOs or public DSOs or CDSO installations (Article 47 of the NC ER).

As, in the version of the System Defence Plan submitted for approval to the Minister of Energy on September 30th 2019, Elia did not include measures to be executed by DSP delivering LFDD services, the proposal of the Test Plan does not foresee any test for LFDD relays implemented on transmission-connected demand facilities.

As indicated in the current proposal of the Test Plan, in case future versions of the System Defence Plan rely on measures from DSPs delivering demand response LFDD, a dedicated test will be developed in concertation with the stakeholders and taking into account the minimum requirements laid down in Article 45(2) of the NC ER and Article 37(4) of the NC DCC. In that case, a new version of the Test Plan will be submitted for approval.

3.4.3. Impact on the document

The distinction between CDSO and DSO in paragraph 7.1 of the Test Plan will be made explicit. The text is replaced by: "*Each **public** DSO**, CDSO** & TSO shall execute testing on LFDD relays implemented on its installation considering the minimum requirements laid down in Article 47 of the NC ER and following the methodologies laid down in Article 37(6) and 39(5) of the NC DCC*."

No modification is required in the Test Plan to clarify the applicability of LFDD test on DSP installation.

3.5. Section 8: Definitions and acronyms

3.5.1. Received comment

"Febeliec appreciates that Elia wants to make a distinction between public DSOs and CDSOs yet is not convinced, as also indicated numerous times before, that the proposed definition is compliant with the European context as described by the Clean Energy Package, where CDSOs are considered DSOs (albeit with potentially some derogations from the obligations for public DSOs if the Member States deems these necessary). Febeliec would thus like to invite Elia to always exhaustively mention both public DSOs and CDSOs if both are covered, which would also resolve the abovementioned issue related to article 7.1."

3.5.2. Elia vision

Elia agrees that a CDSO is a subset of a DSO in the context of the Clean Energy Package. To avoid any confusion, the distinction will be made explicit throughout the entire document.

The definition of DSO used in the Test Plan is slightly adapted.

3.5.3. Impact on the document

A clear distinction between public DSO and CDSO has been made throughout the entire document. Public DSO and CDSO are now explicitly identified.

A precision is added on the definition of DSO "*DSO = Distribution System Operator. Where DSO is used in this document, it is to be understood as the operator of a public distribution system. For the avoidance of doubt, a CDSO is not to be interpreted as a sub category of a DSO in this document.* ***Requirements for CDSOs are explicitly mentioned.***"

ANNEX I: FEEDBACK RECEIVED

1. Comments received from FEBEG

Friday, November 15, 2019

20191014_Two_public consultations_in the_framwork_in_the_network_code_on_emergency_and_restoration

Name	Jean-François Waignier
Email	jean-francois.waignier@febeg.be
Organization	FEBEG
Comments/suggestions to the consultation	Comments on public consultation testplan: Art. 4.5 We understand that the tests of LFDD relays concerns only LFDD relays implemented on the installations of the DSOs or TSO, not on installations of grid users. Can Elia confirm our understanding, and if LFDD relays are implemented on TSO installations connecting grid users (transmission-connected demand facilities) ?

Almost done...

You are about to submit your response. By clicking "Submit" you give us permission to analyze and include your response in our results. After you click "Submit", you will no longer be able to go back and change any of your answers.

Answer confidential ? No

It is important to know that Elia will consolidate the different remarks and publish them on its website at the end of the consultation unless the respondent requests confidentiality in its response. The Elia response to the remarks made will be provided via a consultation report. This consultation report will also be published on the Elia website.

2. Comments received from Febeliec

Febeliec answer to the Elia consultation on the Terms and Conditions for restoration service provider (RSP) and the Test Plan

Febeliec would like to thank Elia for this consultation on the Terms and Conditions for restoration service provider (RSP) and the Test Plan.

On the terms and conditions for restoration service providers, Febeliec wants to refer to its comments on the general conditions, which were the subject of a different public consultation yet are also relevant related to this consultation. Febeliec also wants to stress the importance of a good design, in order to foster sufficient competition while guaranteeing the availability of restoration services such as black start, and this all in order to limit the cost for the grid users. On the content of the document, Febeliec would like Elia to revise the definition of electrical zones, excluding the exhaustive list, in order to avoid to have to go through a complete revision of all documents containing this definition at any modification of the delineation of the electrical zones (this comment was also already made in the course of numerous other consultations).

On the test plan, Febeliec urges Elia to either publish the list of concerned SGUs or make sure that those SGUs are duly and correctly informed of their (exhaustive) obligations under this test plan. Febeliec understands from the document that currently no measures are included for defence service providers delivering demand response and demand response low frequency demand disconnection (LFDD), but asks that if any future version would contain any such measure, those will be preliminarily discussed with the grid users in the relevant working groups of the Elia Users' Group. With respect to article 5.2, Febeliec would like to see the text and title reviewed in order not to refer to demand response but rather load shedding, as the low frequency demand disconnection will not be a voluntary demand response service, but an obligatory, involuntary and non-remunerated load shedding. This would also make clear the distinction between article 5.1 and 5.2. On article 7.1, Febeliec would like Elia to bring clarity on the status of the CDSO, as the first alinea refers to each DSO whereas the third alinea also includes the CDSOs, leading to confusion on which obligations are imposed to the CDSOs. In this context, Febeliec would also like to comment the definition of DSO in article 8. Febeliec appreciates that Elia wants to make a distinction between public DSOs and CDSOs yet is not convinced, as also indicated numerous times before, that the proposed definition is compliant with the European context as described by the Clean Energy Package, where CDSOs are considered DSOs (albeit with potentially some derogations from the obligations for public DSOs if the Member States deems these necessary). Febeliec would thus like to invite Elia to always exhaustively mention both public DSOs and CDSOs if both are covered, which would also resolve the abovementioned issue related to article 7.1.