Danish Energy Association. Comments on ERGEG Draft Guidelines of Good Practice for Operational Security

ERGEG Ref: E08-ENM-02-04 10 April 2008.

Danish Energy Association is in general in agreement with the contents of the Draft. We would however like to point out, that tasks which involve the DSOs, e.g. clause 4.3, may have considerable economical and practical implications for the affected DSO companies. The guide should stress these tasks to be solved in cooperation/consultation with the DSOs.

It should be clarified in sub clause 4.3.2, that the extension of the real time measurements and information, the dynamics in "real time" etc. should be discussed and solved in cooperation with the DSOs, and important details like for example the storage over time of the information should be agreed upon. One could suggest the principle, that the part that need the information shall store it, and accordingly, if the information is only relevant for the TSO, then they should be the responsible.