

Public Consultation of the ERGEG Guidelines of Good Practice for Operational Security

Email Response from SWM - Besser leben mit M. Konzernstrategie und Konzernsteuerung Regulierungsmanagement

Received 13/06/2008 10:34

We appreciate the possibility of giving a statement to the ERGEG consultation E08-ENM-02-04 Draft Guidelines of Good Practice for Operational Security. Please find enclosed our comments and change requests. Please note, that in the document "E08-ENM-02-04_GGP-OperationalSecurity_2008-04-10.pdf" the numeration of the index of context doesn't comply with the one in the text. Our Comments apply to the numeration in the text.

To Point 3.3. a "These GGP specify at a "meta-level":
Surely it is advantageous, if the whole rule type, from the present GPP up to the technical rules, will be obligatory by law. It has to be made sure, that every affected market player, especially the TSO's, DSO's, generators and end consumers, are included in the development and determination of the itemized rules.

To Point 4.3. "Distribution System Operators":
It is discriminating, if only the DSO's, who are connected directly to the Transport System, are obliged to transmit certain informations and provide backing activities.

A control area is defined by the sum of generation, the sum of system load and the sum of all trading transactions overall the control area. Therefore it is not sufficient to oblige only the DSO's, who are connected directly to the Transport System. The generation, the consumption and the trade of all the DSO's in one control area have effects on the control area of the TSO. It is in the tenor of a "Guideline of Good Practice", if the relation between a downstream system operator and an upstream system operator is described in an informational, contractual and operative cascade.

To Point 4.3.3 "The DSOs shall participate"....:
It has to be made sure, that the emergency concepts of the TSO's are only developed after clearing with the DSO's.

SWM Infrastruktur GmbH is a Distribution System Operator (DSO), whose distribution network is directly physically connected to the transmission grid of E.ON Netz GmbH in Germany. SWM Infrastruktur GmbH is a subsidiary company of Stadtwerke München GmbH.

Kind regards

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