

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

Email Response from Svensk Energi – Swedenergy - AB

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I have some concerns regarding the first clause in chapter 4.4.1. "The generator shall:". This might be in conflict with the way we do in Sweden and our neighbouring countries with the order of primary regulation or frequency control

Within Nordel there is an agreement concerning primary regulation (frequency control) and for what amount that each country should have preparedness. Before actual period the TSO decides the necessary demand up to the agreed level. The TSO purchases in advance (each country has their own method) the amount of frequency control needed chosen through bids from the actors on the market. Actors in the neighbouring countries are allowed to give bids. After the trade is closed the actors have to make plans for the electricity production (preferentially hydropower) so that the agreed amount can be delivered.

This trade gives the market actors compensation for the reservation by the TSO of electricity generation that otherwise could be bids on the Nordic power exchange Nord Pool.

Best regards

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