

1. The 7 propositions of chapter 4.:

1. Correction of definitions and measuring rules:

We mainly agree with the refinement of the definitions.

During the evaluation of the measures to be taken, the following points should be treated apart each time:

- Network events due to tension occurring because of breakdowns (and not because of programmed works),
- Programmed switching-offs and
- Normal operation (EN 50160 goes for this with certain restrictions.)

In case of L/V network events and during their measures, there is a question raising that has to be answered on a theoretical level: Is the quality that is perceived by the customers or the measured quality that the regulation goes for. (Presently, according to the definition of SAIDI indicator on L/V, a breakdown starts at the customer's reporting.)

2. Limit values of changes in tension

We agree that the definition of intervals of 5% deriving from statistics makes it theoretically possible that in 5% of the time there is no electric supply. It could be corrected. To note, that the Hungarian Energy Office applies currently a more restricted regulation than the standard.

3. Extension of EN 50160 for higher voltage levels

We mainly agree with the proposition.

The expectations relative to higher voltage level (as well) should be based upon customers' demands. On writing the regulation, it should be considered that the impact of events due to tension on these levels of network is considerably decreases, which also means less customer derangement.

4. Refinement of ambiguous values

We mainly agree with the proposition.

5. Rights and obligations of the concerned parties.

The document is primarily concerned about the following questions regarding separating responsibilities: Till what limit the equipments have to bear network events due to tension and from what limit the intervention of the Regulator is needed regarding the number of events. In our opinion, the fixation and treatment of responsibility for causing network events due to tension – especially by customers - is not accentuated enough.

6. Introduction of limit values

If the definition of limit values is not enforced generally by the standards and the regulators of each country fix them, it is very important to take into consideration the territorial characteristics of the given country. In Hungary, on regulating the indicators corresponding to breakdowns, there were some principles established, for example: intent of a continual improvement and the „acceptance” of the different starting values. We propose the application of these kinds of principles while creating the future rules on tension-quality.

In case of certain prescriptions, regional differences can last for a long time due to network characteristics. For example: prescribed short-circuit performances in areas with few inhabitants.

7. Unique contracts

We find the possibility of unique contracts extremely problematic. It could be guaranteed only in very few cases that other customers will not profit of the advantages of a “good” network developed for a customer paying more expensive for a better quality.

2. Remarks on point b.) of chapter 7. – Effects of exceptional weather

In our opinion, the definition of an exceptional weather should be regulated. The practice in Hungary assigns it to the designed level of the network – to a wind of 120 km/h – which is incorrect from several points of view. This vision considers the networks without their environment; it does not take into consideration the fact that breakdowns occurring during an exceptional weather are primarily due to network environment (for example: falling trees). This approach does not take into consideration the multiplication of extreme weather conditions against which the networks cannot resist.

3. Remarks on point c.) of chapter 7– double-leveled regulation

We mainly agree with the generality of double-leveled regulation.

In our opinion, the cost-analysis due to tension-quality regulation and to its restriction is not accentuated enough in the document.

According to the subjects in question, the introduction of a monitoring and planned measuring system would need important resources and an eventual further restriction of rules would increase the amounts needed.

It is also important to see the volume of economies it represents for the customers and what the customers’ position is on the increase of distribution tariff.