

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

Email Response from envia Verteilnetz GmbH

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Dear Madam or Sir,

There are some comments to the Draft Guidelines of Good Practice for Operational Security (Ref: E08-ENM-02-04) from envia Verteilnetz GmbH (envia NETZ).

envia NETZ is a Distribution System Operator (DSO) which is directly physically connected to the transmission grid of Vattenfall Europe Transmission GmbH in Germany.

In our opinion following aspects have to add:

- Operational security is NOT only a task for TSO's and direct connected DSO's. If the operational security is in danger because of high generation of electricity (for instance in times with high generation by windturbines), ALL System Operators in this area have to execute the remedial actions (after the TSO had it ordered) to restore the system to the normal operating state without delay.

- A data exchange between ALL System Operators, if the data is important for there grid, is necessary.

In addition to this, in our opinion for the future we need another procedure of consultation to note the interests of ALL DSO's without discrimination against TSO's.

Yours sincerely,

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