

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

Email Response from DONG Energy

Received 11/06/2008 09:44

Dear Sirs,

DONG Energy thanks for the opportunity to comment on the draft proposal for Guidelines of Good Practice for Operational Security. We very much support the very open minded procedure followed by ERGEG, and we are glad to be able to contribute in this process.

We fully acknowledge the responsibility of the TSO's in the field of operational security. We would like to point to the fact, that the TSO's need a good cooperation with other stakeholders in order to solve their tasks. For instance load shedding is normally implemented in the DSO's (or lower) grids, and a lot of the tools needed in the daily operation are installed at generating units. We think that good cooperation in emergency situations should be prepared by and could be significantly improved by good cooperation in normal situations. We suggest that this kind of cooperation between experts from the TSO's and other involved stakeholders should be formalized. We therefore recommend, that the TSO shall have the responsibility of establishing expert-forum, for preparation of exercises, determination of costs of different solutions as the basis for finding the optimal solutions etc. naturally with the TSO's at the end of the table.

- We recommend that this subject is mentioned in clause 4.2 between the existing points 4 and 5 as a new clause 5: (5) establish expert-forum for continuous coordination of the solution of relevant tasks including exercises with the contribution relevant DSOs, other TSOs, generators and large customers (who are connected at the transmission level)

The more measurements and data a TSO has from an area, the more possibilities the TSO has to monitor changes of system state and initiate preventive steps. On the other hand costs clearly increases by the amount of data, and there is a risk of losing overview. It is therefore necessary to assess the costs of new initiatives and weigh them against possible benefits. We think it is inappropriate if the demands of one TSO vary too much from the demands of neighboring TSO's - since extra costs can be paid by the customers only. The overall goal should be, that the DSO's costs don't vary (too much) due to different TSO-requests motivated by different handling of security of supply. The relevance of new real time operational information should be examined and checked before implementation, and it should at least be verified that the socioeconomic benefits exceeds the extra costs.

- We recommend that clause 4.3.2 is written (new text in italic): "The DSOs shall provide the TSOs with relevant, *necessary and socioeconomic well-proven* real-time operational information of the distribution network and generation and

consumption units connected to the distribution network, based on well described if requested by the TSO.

We strongly support the rule drafting principles proposed in clause 5.2. We think that the possibility for stakeholders to suggest rule-changes and new rules is very important, and that this evidently will lead to even better rules. We suggest that the suggested rule drafting principle should be generalized and used on for instance market rule drafting as well. In this specific area we recommend, that the expert-forum mentioned above should play an important role in the external consultation, and that the expert-statements from the fore is published as well.

- We recommend, that clause 5.2.2. is supplemented in the following way (new text in italic) "..... open and transparent manner with all appropriate stakeholders *and include evaluation in expert forum.*

We agree that it is necessary to publish the rules of each synchronous area rules are published as mentioned I clause 5.2.4. We recommend, that rules for interfaces between synchronous areas are published too - with no exceptions. Transmission capacity can be reserved for interchange of reserves, this will affect the functionality of the internal European market, transparency in these matters is therefore important. It is also important to understand the way two synchronous areas support each other in case of emergency situation, and how and where the needed extra reserves used in this manner are procured (it is important that reserves cannot be used twice, otherwise disturbances from one area could spread to another area)

- We recommend that the last line in 5.2.6 is written: "These agreements shall be made public in an organized way and be understandable by all interested parties"

We support that interconnection capacities may not be limited in order to solve congestions inside national grids without taking into account cost effectiveness and the minimization of impact of the internal market as mentioned I clause 6.2.1. We understand it in such a way, that limitations coming from one interconnection (to country one) may not be moved to another interconnection (to country two), but since the formulation leaves room for interpretation we recommend a more precise formulation.

- We recommend that the wording in clause 6.2.1 is written (new text in italic) " Interconnection capacities may not be limited in order to solve congestions inside national grids *or in order to solve limitations on other interconnection capacities* without taking into account"

Deadlines are mentioned in clause 6.2.4. Since the internal European market has developed intraday markets, we think it is important to mention the intraday market in the list in 6.2.4.2. We don't think it is necessary to publish two days ahead.

- We recommend, that there a new number 4 is added in the list in clause 6.2.4.2: (4) Update and disclosure of the hourly values of the transmission capacity available for commercial purposes, for the following hours (intraday market)

Should you have any questions on the above then please feel free to contact Flemming Birck Pedersen (phone 0045 51587179/e-mail flebp@dongenergy.dk).

We thank you for taking our comments into consideration.

Sincerely,

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