

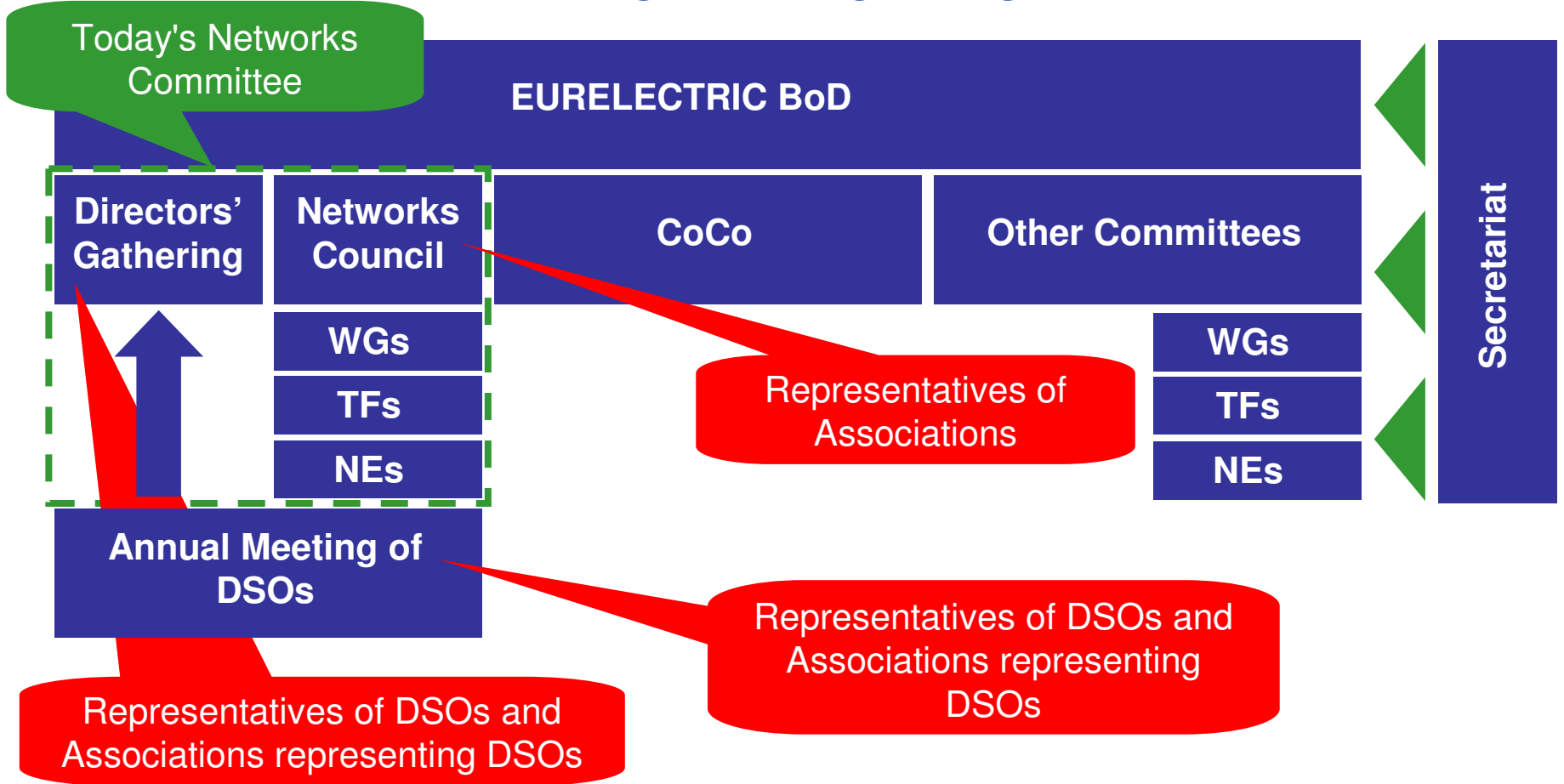
**ERGEG-ENSTO-E Workshop
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**EURELECTRIC DSOs
Preliminary Views on the draft comitology
guidelines on fundamental data
transparency**

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The enhanced representation of DSOs within EURELECTRIC



General Comments

- **EURELECTRIC welcomes ERGEG's activity towards the adoption of more detailed binding rules on fundamental data transparency**
- **The national regulatory frameworks should ensure fair recognition of compliance expenditures - including establishing transparency & implementation IT platforms and execution of the processes for grid operators and grid users**
- **Compliance efforts of the parties concerned should be analysed in greater detail**



Specific comments on the “load section” (1/4)

- A precise definition of the **roles and responsibilities of DSOs** is missing in the draft.
- Although the responsibility for data collection and load forecast is on TSO side, we would welcome if **DSOs are associated to the load forecast methodology preparation process**. In order to ensure this the implementation date should be extended – e.g. to 24 months.
- **DSOs should be involved in designing the system of data exchange**; use of statistical elements in the methodology will be necessary in countries with higher number of DSOs.



Specific comments on the “load section” (2/4)

- Similar procedure as for generators (reporting directly to the TSO or to existing regional platform) should apply for large consumption units, **independently from connection to TSO or to DSO grid**



Specific comments on the “load section” (3/4)

- **The definition of “total load” is welcome (crucial for price formation) but should be clarified.** For example: it should be clarified that part of it (like residential PV or other small plants) is an “estimation”. Moreover, the responsible party for that “estimation” and the followed methodology should be precised.
- **The total load is unlikely to be measurable in the short to medium term.** Total load should be published even when partly based on estimations (4.1.3)
- **4.1.3.6 introduces “forecast margin”,** however the definition is unclear and as is the process methodology



Specific comments on the “load section” (4/4)

- 4.1.3.1 foresees the submission of hourly actual vertical load at H+1. However, **where would the hourly actual vertical load be exactly measured?**
 - At the HV exit point?
 - At the customer metering point?

- Indeed, a form of data submission from the exchange point between TSO and DSOs is already in place (distance on-line reading). Instead, **continuous on-line reporting would have significant impact on processes in many countries if some criteria for reporting from the metering level are added.**



How should the TSO/DSO cooperation look like in the future when it comes to data exchanges?

- **Data flows between TSOs and DSOs should go in both directions (both top-down and bottom-up)**
- **TSOs & DSOs should enhance their cooperation in grid planning (i.e. sharing more data)**
- **EURELECTRIC's Networks Council has recently set up a Network of Experts which looks at the future « Interface between TSOs and DSOs » in Europe**



Thank you for your attention !

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