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IFIEC RESPONDS TO THE ERGEG CONSULTATION PAPER ON “DRAFT GUIDELINES OF GOOD PRACTICE FOR OPERATIONAL SECURITY”

General remarks

1. IFIEC welcomes ERGEG’s draft of Guidelines for Good Practice for Operational Security (GGP-OP), intending to provide a framework for technical rules and codes of the 5 EU independent synchronous regions that are also connected to each other through asynchronous (or DC) links.
2. The outstanding effort in the second half of the last century by the European technical associations of TSOs like UCTE and Nordel, has resulted in a vast and reliable electrical interconnection throughout the continent. Today, this benefits millions of users in terms of a higher level of security of supply and a more efficient generating system. This is to be acknowledged by every stakeholder, just as the new challenges derived from the determination to integrate the markets should receive the appropriate solutions. But a new complexity is required for the immediate future: how to manage and integrate substantial volumes of intermittent renewable energy without compromising system security or either penalising the use of interconnections or operational reserves. Undoubtedly TSOs must find the way for further co-operation.
3. From the experience of recent incidents, IFIEC believes it’s time to address the technical solutions to counter identified operational weaknesses of the interconnected system, such as that:
 - 3.1. TSOs do not exchange in general real-time data on topology, generation or demand that are necessary to model the system behaviour or to conduct contingency analysis;
 - 3.2. operators at one TSO are not familiar with the grids or operational practices of their neighbours, making it very difficult to anticipate risks and coordinate corrective actions following an incident;
 - 3.3. no TSO oversees the European system as a whole and no single entity oversees the impact on the entire system of individual decisions taken by TSOs, making difficult to manage or anticipate flows at the interconnections;
 - 3.4. during incidents, nobody is responsible for identifying “islands of frequency” or networks separation, making riskier and longer resynchronisation process;
 - 3.5. during emergencies load-frequency control requires a level of coordination that simply does not exist today, i.e. the switch from “area error” mode to “pure frequency” mode is decided freely by TSOs, while DC links do not contribute at all to frequency stabilisation.
4. IFIEC is convinced that the establishment of a European System Operator (ESO) in a position to supervise real-time operation at the interconnection level would be the most effective and simple solution to current needs. An ESO would also be a trustworthy observer able to propose and promote grid reinforcements to better integrate the markets and guarantee system security. However the debate still seems to be driven more by political or corporate interests rather than by technical grounds.

Specific comments

5. To be efficient, ERGEG should preferably orient its efforts to tackle the needs not being sufficiently addressed by TSOs’ associations today (c.f. the examples given above), while the rest of operational rules could be transposed in a first step from the codes already in use and developed over many years by such associations. ERGEG adoption of such technical codes will assure their enforcement and a balanced involvement of all affected parties in later revisions.

6. As a background to developing the Guidelines, ERGEG mentions provisions of Regulation 1228/2003. ERGEG may also refer here to elements of Directive 2005/89 concerning measures to safeguard security of electricity supply and infrastructure investment, which was supposed to be adopted by every Member States before February 24th 2008. For instance, TSOs obligations to ensure security of supply in their respective control areas and to cooperate beyond their borders are clearly settled in its article 4. Demand side actions, claimed by ERGEG to be supportive to TSOs responsibility of balancing the system, will find also a good basis in article 5.2 of Directive 2005/89.
7. Responsibilities of different market players should specifically distinguish obligations from voluntary programs. Contrary to what may be asked of generators or distributors, demand side actions should rely upon economics incentives and not upon mandatory principles.
8. Under a market environment, transparency and information dissemination appears as a new core task for TSOs while operating the system. Operational Guidelines should therefore address how the system reserve, loads and generation forecasts should be calculated and broadcasted in different time frames. Information on exchange capacity and on transmission congestions should also be made available regularly to market players.
9. Transmission capacity calculation methods should require a full exchange of updated information among TSOs. Long term capacity calculations should reflect the experience of daily operation rather than consider worst-case scenario. This information should be of a great value to determine new grid investments.

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