

## Nordenergi's comments to the consultation on the Nordic TSOs' proposal for regional operational security coordination in CCR Nordic (SO GL article 76)

Nordenergi, the umbrella association of the Nordic electricity industry associations, welcomes the consultation on the Nordic TSOs' proposals for frequency quality and FCR related methodologies for the Nordic synchronous area. Nordenergi represents retailers, distributors and producers of electricity in Sweden, Denmark, Norway, Finland and Iceland.

Our comments to the consultation are given below. We want to point out that the proposal is difficult to understand fully and in order to provide relevant comments some clarifications are needed.

### Comments

Nordenergi considers the proposal being a step in the right direction in terms of transparency. We emphasize that it is important that reasons for special regulations are reported more transparently than today - when spec regarding (here "remedial actions). Reported on the ENTSO-Es transparency platform.

We consider the proposal for a counter trading to be very positive. The proposal refers to Article 13 of "COMMISSION REGULATION (EU) No 543/2013" regarding the publication of data:

<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

Even more transparency is desired with regards to the method itself and the choice between quantitative and qualitative analysis of operational reliability. In general, there is a danger that TSOs act too conservatively in values and therefore the requirement for transparency is vital. One example is the experiences from 23-24 Jan I SE4.

On ID market. we think that the requirement for at least 3 updates of security analysis during the ID period is a good starting point. The risk we see with too few analyses per day is that the TSOs activate preventive measures too far into the future. Thus, a risk for contracted counter trade several hours in advance (as of January 23-24). While TSOs may decide to deactivate an action, or wait to activate, the risk is still high that the TSOs are too defensive. Consequences can be that market participants are shut out of the market or that they are bound up with restrictions. The TSOs should generally wait for measures to be as close to operating hours as possible.

We note that the proposal does not seem to deal with the more urgent issue for the market - How and how often intraday capacity should be updated? That question should either be added alternative that the Regulators should monitor that it is handled in other parts of the regulations.

### Clarifications

Article 5

All TSOs shall deliver the day-ahead individual grid model for building the common grid model. Why not in addition / instead all relevant information for the calculation of common grid model?

#### Article 7

How are the unexpected events to be handled? How would the SE4 situation been handled, was this methodology applicable?

#### Article 15-17

The process of preparing, identifying, and activating remedial actions outlined in article 15-17 is not clear. When and how should remedial actions be implemented? Article 17 is vague; "Each TSO shall activate the cross-border impacting remedial actions agreed in day-ahead and intraday regional operational security coordination processes in due time."

#### Article 31

The purpose and content of Impact Assessment is unclear and should be described in further detail.