

# European Network Codes

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# General Comments

- ESB welcomes the formal establishment of this forum
- Difficult to assess impacts when SEM future market design is unknown
  - Market codes (CACM, Forwards and Balancing) of greater relevance than the system codes
- However:
  - Where possible key rules should be defined in the codes and, not subject to future process
  - Rules that are postponed should be subject to regulatory approval and wider stakeholder consultation
  - A robust modification process should be developed
  - Use of terminology/definitions needs to be more consistent across codes

# CACM

- Consultation (Article 5)
  - Methodologies should be consulted on with all stakeholders (not limited to a stakeholder committee)
- Publication of Information (Article 6)
  - There should be a requirement to publish all documents
- The network code should (at least) provide for the possibility for stakeholders to propose amendments to the methodologies
- Other concerns:
  - Not clear how intra-day will be implemented (how is capacity to be priced)?
  - How will DC cable losses be treated with firmness and implicit price coupling in place (Article 90?)
  - Unclear interactions with the System Operation codes, REMIT and Transparency Guideline in terms of information provision and Common Grid Model creation
  - Potential for Bidding Zone change

# System Codes

- Many roles for TSOs but few obligations e.g.
  - OS: No requirements for TSOs expressed in figures (terms such as sufficient or minimum) in contrast to RfG code
  - OPS: Minimal harmonisation of TSO practices (e.g. “each TSO”) - Not what you would expect from the Third Package (i.e. TSO cooperation)
- OPS: Scope for unilateral TSO decisions (without consulting relevant stakeholders)
- Information requirements from generators should only be provided once – requires links between planning, CACM and System Operation codes (also REMIT, Data Transparency Regulation)
- Role of the DSOs needs careful consideration
  - Art. 9, Art. 17 and Art. 30 (OPS) foresee scenarios, forecasts, and analysis for Power Generating Facilities and Demand Facilities connected to Distribution Network performed by TSOs without mentioning DSOs’ role/obligations.
  - Obligations regarding Temperature Controlled Devices (e.g. freezers) proposed by TSOs (DCC)

# Suggestions for this Forum

## Network Code Group –

- Broad membership designed to be a forum for updates from the TSO's representatives on drafting teams; attended/co-chaired by CER/NIAUR
- Discussion and comment fed back into drafting teams; occasional formal contact with ENTSO-E (e.g. letters sent on specific topics) if required
- Focussed sessions held on technical detail of specific codes during consultation periods
- Prioritised issue lists created for each code

## European Electricity Stakeholder Group

- Chaired jointly by Comitology representatives (from Departments) and regulator
- Broad industry membership/distribution list
- Forum for ACER and EC updates, and discussion regarding Network Codes for the purpose of briefing the Comitology team
- Takes issue list started by Network Code Group and refines to core stakeholder issues – to form the priority Comitology issues for the Comitology team.

