
Explanatory document for the Nordic synchronous area proposal for coordination actions aiming to reduce FRCE as defined in Article 152(14) and measures to reduce FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16) of the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation

1. Introduction

The Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter “**SO Regulation**”) sets out rules on relevant subjects that should be coordinated between Transmission System Operators, as well as between TSOs and Distribution System Operators and with significant grid users, where applicable. The goal of the SO Regulation is to ensure provision of an efficient functioning of the interconnected transmission systems to support all market activities. In order to deliver these objectives, a number of steps are required.

One of these steps is to define coordination actions aiming to reduce the FRCE. Pursuant to Article 119(1)(q) of the SO Regulation, all Transmission System Operators in the Nordic LFC block shall jointly develop common proposals for the coordination actions aiming to reduce the FRCE as defined in Article 152(14). In addition, pursuant to Article 119(1)(r) of the SO Regulation, all Transmission System Operators in the Nordic LFC block shall jointly develop common proposals for measures to reduce the FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16).

According to Article 6(3)(e) (ii) and (iii) of the SO Regulation the proposal for coordination actions aiming to reduce FRCE as defined in Article 152(14) and measures to reduce FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16) (hereafter referred to as “**Proposal**”) shall be submitted for approval by the relevant national regulatory authorities (hereinafter “NRAs”) no later than 14 September, 2018. The Proposal is submitted for regulatory approval to all NRAs in the Nordic LFC block. According to Article 6(6) of the SO Regulation the Proposal needs to be submitted to ACER as well, who may issue an opinion on the Proposal if requested by the NRAs.

This document contains an explanation of the Proposal from all TSOs of the Nordic synchronous area (hereinafter “**TSOs**”). It is structured as follows. The legal requirements for the Proposal are presented in Chapter 2. Chapter 3 describes the objective of measures aiming to reduce FRCE. Chapter 4 provides an overview of the existing situation and Chapter 5 an outlook to future developments. The proposed measures are described in Chapter 6. Chapter 0 describes the expected impact on the relevant objectives of the SO Regulation. Finally, Chapter 8 provides the timeline for implementation and Chapter 9 describes the public consultation.

2. Legal requirements and interpretation

2.1 Legal references and requirements

Several articles in the SO Regulation set out requirements which the Proposal must take into account. These are cited below.

- (1) Article 119(1)(q) and (r) and 119(2) of the SO Regulation constitutes the legal basis that the Proposal should take into account. Article 119 has the following content:

“1. By 12 months after entry into force of this Regulation, all TSOs of each LFC block shall jointly develop common proposals for: [...]

(q) coordination actions aiming to reduce the FRCE as defined in Article 152(14); and

(r) measures to reduce the FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16).

2. All TSOs of each LFC block shall submit the methodologies and conditions listed in Article 6(3)(e) for approval by all the regulatory authorities of the concerned LFC block. Within 1 month after the approval of these methodologies and conditions, all TSOs of each LFC block shall conclude an LFC block operational agreement which shall enter into force within 3 months after the approval of the methodologies and conditions”

(2) Article 152 of the SO Regulation has the following content:

“System states related to system frequency

1. Each TSO shall operate its control area with sufficient upward and downward active power reserve, which may include shared or exchanged reserves, to face imbalances between demand and supply within its control area. Each TSO shall control the FRCE as defined in the Article 143 in order to reach the required frequency quality within the synchronous area in cooperation with all TSOs in the same synchronous area.

2. Each TSO shall monitor close to real-time generation and exchange schedules, power flows, node injections and withdrawals and other parameters within its control area relevant for anticipating a risk of a frequency deviation and shall take, in coordination with other TSOs of its synchronous area, measures to limit their negative effects on the balance between generation and demand.

3. All TSOs of each synchronous area shall specify a real-time data exchange in accordance with Article 42 which shall include:

(a) the system state of the transmission system in accordance with Article 18; and

(b) the real-time measurement data of the FRCE of the LFC blocks and LFC areas of the synchronous area.

4. The synchronous area monitor shall determine the system state with regard to the system frequency in accordance with Article 18(1) and (2).

5. The synchronous area monitor shall ensure that all TSOs of all synchronous areas are informed in case the system frequency deviation fulfils one of the criteria for the alert state referred to in Article 18.

6. All TSOs of a synchronous area shall define in the synchronous area operational agreement common rules for the operation of load-frequency control in the normal state and alert state.

7. All TSOs of the GB and IE/NI synchronous areas shall specify in the synchronous area operational agreement operational procedures for case of exhausted FCR. In those operational procedures the TSOs of a synchronous area shall have the right to require changes in the active power production or consumption of power generating modules and demand units.

8. All TSOs of a LFC block shall specify operational procedures for cases of exhausted FRR or RR in the LFC block operational agreement. In those operational procedures the TSOs of a LFC block shall have the right to require changes in the active power production or consumption of power generating modules and demand units.

9. The TSOs of a LFC block shall endeavour to avoid FRCEs which last longer than the time to restore frequency.

10. All TSOs of a synchronous area shall specify in the synchronous area operational agreement the operational procedures for the alert state due to a violation of system frequency limits. The operational procedures shall aim at reducing the system frequency deviation in order to restore the system state to the normal state and to limit the risk of entering the emergency state. The operational procedures shall include the right of TSOs to deviate from the obligation set in Article 143(1).

11. If the system state is in the alert state due to insufficient active power reserves in accordance with Article 18, the TSOs of the concerned LFC blocks shall, in close cooperation with the other TSOs of the synchronous area and the TSOs of other synchronous areas, act to restore and replace the necessary levels of active power reserves. For that purpose, the TSOs of a LFC block shall

have the right to require changes in the active power production or consumption of power generating modules or demand units within its control area to reduce or to remove the violation of the requirements concerning active power reserve.

12. If the 1-minute average of the FRCE of a LFC block is above the Level 2 FRCE range at least during the time necessary to restore frequency and where the TSOs of a LFC block do not expect that FRCE will be sufficiently reduced by undertaking the actions in paragraph 15, TSOs shall have the right to require changes in the active power production or consumption of power generating modules and demand units within their respective areas to reduce the FRCE as specified in paragraph 16.

13. For the CE and Nordic synchronous areas, where the FRCE of a LFC block exceeds 25 % of the reference incident of the synchronous area for more than 30 consecutive minutes and if the TSOs of that LFC block do not expect to reduce sufficiently the FRCE with the actions taken pursuant to paragraph 15, the TSOs shall require changes in the active power production or consumption of power generating modules and demand units within their respective areas to reduce the FRCE as specified in paragraph 16.

14. The LFC block monitor shall be responsible for identifying any violation of the limits in paragraphs 12 and 13 and:

(a) shall inform the other TSOs of the LFC block; and

(b) together with the TSOs of the LFC block shall implement coordinated actions to reduce the FRCE which shall be specified in the LFC block operational agreement.

15. For the cases referred to in paragraphs 11 to 13 all the TSOs of each synchronous area shall specify in the synchronous area operational agreement actions to enable the TSOs of a LFC block to actively reduce the frequency deviation with the cross-border activation of reserves. In cases referred to in paragraphs 11 to 13 the TSOs of the synchronous area shall endeavour to enable the TSOs of the concerned LFC block to reduce their FRCE.

16. The TSOs of a LFC block shall specify, in the LFC block operational agreement, measures to reduce the FRCE by means of changes in the active power production or consumption of power generating modules and demand units within their area.”

(3) Article 6(3)(e)(ii) and (iii) of the SO Regulation states:

“The proposals for the following terms and conditions or methodologies shall be subject to approval by all regulatory authorities of the concerned region, on which a Member State may provide an opinion to the concerned regulatory authority: [...]

(e) methodologies and conditions included in the LFC block operational agreements in Article 119, concerning:

(ii) coordination actions aiming to reduce FRCE as defined in Article 152(14);

(iii) measures to reduce FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16);”

2.2 Interpretation and scope of the Proposal

This Proposal only covers the ‘normal’ and the ‘alert state’ (as defined in Article 18 of the SO Regulation). The ‘emergency state’, ‘blackout state’ and ‘restoration state’ are referred to in the commission regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration. The measures included in this proposal are aimed to prevent for to limiting the risk of entering into the emergency state. However, some measures may apply to several states.

Paragraph 14 of Article 152 of the SO Regulation refers to paragraph 12 and 13: “*The LFC block monitor shall be responsible for identifying any violation of the limits in paragraphs 12 and 13*”. The limit in paragraph 12 is specified as “*the 1-minute average of the FRCE of a LFC block is above the Level 2 FRCE range at least during the time necessary to restore frequency*”.

The limit in paragraph 13 is specified as “*FRCE of a LFC block exceeds 25 % of the reference incident of the synchronous area for more than 30 consecutive minutes*”. The largest reference incident of the Nordic synchronous area is approximately 1400MW. Consequently, 25% of the reference incident is approximately 350MW, which needs to be converted to a frequency deviation. Assuming 7000MW/Hz, this will result in approximately 50mHz. Consequently, the limit means for the Nordic synchronous area that ‘*where the frequency deviation exceeds 50mHz for more than 30 consecutive minutes*’. Since 50mHz is within the standard frequency range of $\pm 100\text{mHz}$, the Nordic TSOs consider this limit a bit too strict. This may be quite normal operation and not be a situation that requires changes in active power production or consumption.

The scope of this proposal only includes those measures that may be applied during the operational hour. Preparation measures to prevent for this situation are not included.

3. Objective of coordination actions and measures aiming to reduce FRCE

To maintain the frequency quality and the FRCE quality the TSOs shall have sufficient measures, not only to keep the frequency within its standard frequency range, but also to be able to let the frequency return to the standard frequency range in case of excursions. The objective of the coordination actions and measures in this Proposal is therefore to provide the TSOs with sufficient tools to maintain frequency quality and the FRCE quality in both the ‘normal state’ and ‘alert state’ and prevent for entering into the ‘emergency state’.

4. The existing situation

During the operational hour the TSOs’ operators follow the trend of the operational situation and continuously estimate upcoming need of readjusting the balancing. In normal and alert state conditions TSOs use market based FRR activation as long as possible.

However, in some cases, where the market does not provide sufficient possibilities to mitigate the problem, the TSOs will have to use other options to maintain system security. The operators make a judgement based on the available real-time data and planning information in order to make a decision on appropriate action(s). In such cases, the operators have the following tools:

- Activate fast mFRR bids with a high volume out of price order;
- Activate TSO owned or controlled reserve power plants;
- Activate available generation and demand response¹ that did not submit mFRR-bids;
- Agree with other TSOs on supportive power over HVDC links;
- Perform manually activated Load shedding.

5. Outlook

The new Nordic balancing model is expected to reduce the need for using the measures in Chapter 4 especially by more automation in balancing and more electronic ordering of mFRR activation.

¹ This refers to prequalified mFRR capacity for which BSPs have not sent in mFRR bids.

6. Proposal measures to reduce FRCE

As discussed in section 2.2 of this Proposal, the scope of this Proposal only includes coordinated actions and measures that are required during the operational hour.

Article 3 of the Proposal specifies the coordination actions aiming to reduce FRCE pursuant to Article 152(14) of the SO Regulation:

Article 3 – Coordinated actions to reduce the FRCE

1. In specific situations when market-based arrangements will not be sufficient to balance the LFC block, the TSOs shall implement the following coordinated actions to reduce the FRCE in accordance with article 152(14) of the SO Regulation:
 - a. Activate fast mFRR bids with a high volume out of price order;
 - b. Activate TSO owned or controlled reserve power plants;
 - c. Activate available generation and demand response that did not submit mFRR-bids;
 - d. Agree with other TSOs on supportive power over HVDC links.

Article 4 of the Proposal specifies the measures to reduce FRCE by requiring changes in the active power production or consumption of power generating modules and demand units in accordance with Article 152(16) of the SO regulation:

Article 4 – Measures to reduce the FRCE by means of changes in the active power production or consumption of power generating modules and demand units within their area

1. If the system is in alert state and measures expressed in Article 3 will not be sufficient to limit the risk of entering into the emergency state, the TSOs are allowed to:
 - a. Request immediate changes in the active power production or consumption of power generating modules and demand units within their control area;
 - b. Perform manually activated load-shedding.

7. Expected impact of the Proposal on the relevant objectives of the SO Regulation

The Proposal generally contributes to and does not in any way hamper the achievement of the objectives of Article 4 of the SO Regulation. In particular, the Proposal serves the objectives to:

- Article 4(1)(c) determining common load-frequency control processes and control structures;
- Article 4(1)(d) ensuring the conditions for maintaining operational security throughout the Union;
- Article 4(1)(e) ensuring the conditions for maintaining a frequency quality level of all synchronous areas throughout the Union;

The Proposal contributes to these objectives by specifying measures to reduce FRCE on top of the measures that are applied continuously to maintain the frequency quality in the Nordic synchronous area. The measures contribute to maintaining operational security and ensure the conditions for maintaining a frequency quality level in the Nordic synchronous area.

8. Timescale for the implementation

The TSOs shall implement the Proposal not later than when Nordic LFC block operational agreement enters into force in accordance with Article 119 of the SO Regulation.

9. Public consultation

Article 11 of the SO Regulation states that: *“TSOs responsible for submitting proposals for terms and conditions or methodologies or their amendments in accordance with this Regulation shall consult stakeholders, including the relevant authorities of each Member State, on the draft proposals for terms and conditions or methodologies listed in Article 6(2) and (3). The consultation shall last for a period of not less than one month.”*

This Proposal has been consulted in the period 1 July to 15 August 2018. The appendix to this document includes the views of stakeholders resulting from the consultations and explains if and how these views have been taken into account in the proposal.

Appendix: Results of Public Consultation

Article 11(3) of the SO Regulation states that: *“The TSOs responsible for developing the proposal for terms and conditions or methodologies shall duly take into account the views of stakeholders resulting from the consultations prior to its submission for regulatory approval. In all cases, a sound justification for including or not including the views resulting from the consultation shall be provided together with the submission of the proposal and published in a timely manner before, or simultaneously with the publication of the proposal for terms and conditions or methodologies.”*. Table 1 lists the views of stakeholders on this proposal resulting from the consultations and explains if and how these views have been taken into account in the Proposal.

Table 1: Views of stakeholders resulting from the consultations and explains if and how these views have been taken into account in the Proposal.

no.	organisation	comment	response TSOs
2	Danish Energy	<p>Overall, we are disappointed with the lack of detail and the absence of actual methodologies across all four proposals. We remind TSOs that, according to Article 6(3)(d-e) of the SO Regulation, the four proposals consulted upon are supposed to contain the actual methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. We find these methodologies and conditions fundamentally lacking in the current proposals.</p> <p>We are also disappointed that these methodologies haven't been prepared in cooperation with the stakeholders and underline that stakeholders must be included in the preparatory process from an early phase.</p> <p>Nordic TSOs, operating one of the most closely integrated regional power systems in the world, should lead the way in European integration through much more ambitious and detailed proposals. The current proposals will delay the Nordic integration by postponing important decisions to the future implementation of a new Nordic balancing model. Furthermore, the proposals will render the Nordic countries non-compliant with the SO Regulation, which the TSOs explicitly recognize in the Explanatory Document on FRR dimensioning rules, by stating that “The proposal presented in section 6 of this document does not comply to the requirements in Article 157 of the SO Regulation in all aspects. [...] The TSOs have agreed on an approach for a new Nordic balancing model. Within the implementation process, the TSOs are developing a FRR dimensioning process which will comply with the requirements in Article 157 of the SO Regulation. Once defined, the TSOs will start an amendment process to this proposal.”</p> <p>We can only conclude that the Nordic TSOs are fully aware of the insufficiencies of the current proposals and find it odd they have nonetheless decided to consult upon them. Our major concern is that that Nordic TSOs may de facto shift decision-making on the relevant methodologies to their parallel initiative on new Nordic balancing - with weakly defined and non-legally binding implementation timelines – instead of complying to the</p>	<p>Comment acknowledged and did not result in a change of the proposals. As referred to by the respondent, the TSOs are in a process of changing their balancing model to fulfil the requirements in the SO Regulation and to reflect the needs for the Nordic situation. The Nordic TSOs have experienced that this process is very complex and time consuming and due to that the Nordic TSOs regret that it has not been possible to finalize the development work yet. However, earlier this year, the TSOs concluded a Cooperation Agreement including the main principles of the new Nordic balancing model and an initial schedule for implementation. At this moment, the TSOs pay a big effort in detailing the new Nordic balancing model. Since the TSOs want to do this carefully and also want to involve stakeholders in the development, the TSOs require more time than originally allowed by the SO Regulation. The TSOs will also like to stress the fact that operational agreements have to reflect the actual operational arrangements and in general not some future concept. Accordingly, the proposals mainly describe the existing situation. Once the Nordic balancing model has been developed, the TSOs will start an amendment process, in accordance with the relevant rules in the SO Regulation. A time plan for the amendments will shortly be discussed with the NRAs</p>

		process laid out in the SO Regulation. In order to fulfil the letter and spirit of the SO Regulation, and remain amongst the leaders of regional power system integration in European, we urge TSOs to take the following specific comments on each of the four proposals into account:	and all stakeholders will be informed. Needed implementation time for TSOs and other stakeholders will also have to be considered.
9	Danish Energy	<i>Coordination actions aiming to reduce FRCE and measures to reduce FRCE by requiring changes in the active power production or consumption</i> The proposal closely mirrors the current coordinated actions available to Nordic TSOs and only new measure introduced – the possibility to “request immediate changes in the active power production or consumption of power generating modules and demand units within their control area” as per Article 4(a). While the other measures are well-known, it is unclear to us exactly what this intervention covers, what procedures will be followed, and how the compensation to affected units will be calculated. We strongly recommend that TSO specify this in the final proposal.	Comment acknowledged and did not result in a change of the proposal. Also today the TSOs have the possibility to request immediate changes. The procedures are national. For rules for settlement in case of suspension of market activities, the TSOs refer to article 39 of the Commission Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration.
10	Danish Energy	We also recommend that the proposal explicitly restricts the situations in which TSOs are allowed to make use of the proposed measures. In the current proposal, the measures can be applied by TSOs in all situations where the LFC block FCRE violates SOGL Article 152(13) – i.e. every time a frequency deviation exceeds 50mHz for more than 30 consecutive minutes. While not very common, such a deviation is in our view not sufficiently extraordinary to justify a TSO non-market intervention with the proposed measures. As this issue is also recognized by TSOs in the Explanatory Document, we suggest that the final proposal includes an explicit exemption from SOGL Article 152(13) in order to avoid any doubt as to when and how TSOs can interfere in the market.	Comment acknowledged and resulted in the following changes to article 3 and 4. To article 3, the TSOs added the situation in which the measures specified in article 3 can be applied: <i>‘In specific situations when market-based arrangements will not be sufficient to balance the LFC block’</i> . To article 4, the TSOs added the condition that <i>‘the system is in alert state’</i> in order to allow the measures specified in article 4 (in addition to the already included condition that <i>‘measures expressed in Article 3 will not be sufficient to limit the risk of entering into the emergency state.’</i>)
12	Danish Energy	In sum, we are surprised and disappointed that TSOs evade the SO Regulation requirements and submit four proposals with little actual substance for consultation. We strongly urge TSOs to start discussions with stakeholders and significantly revise the four proposals in line with our comments above, most importantly by adding substance and details on the envisaged methodologies in order to bring them into compliance with the SO Regulation, before submitting them for final NRA approval.	Comment acknowledged and did not result in a change of the proposals. The TSOs confirm that in the development process of the new Nordic balancing model, stakeholder involvement is of paramount importance.
14	Energy Norway - Association	While Energy Norway regrets that the topics of this consultation has not been agreed upon within the NBC, we recognize that since the NBC represents a fundamentally new way of balancing the Nordic synchronous system, and the Nordic TSOs have different viewpoints, the development process is complex and time-consuming and not all aspects have been concluded up to this point. But given both the importance and complexity of the NBC and the requirements given by the SOGL, it is important that the TSOs increase the transparency and involvement related to the development and	Comment acknowledged and did not result in a change of the proposals. The TSOs confirm that the development process is complex and time-consuming and that not all aspects have been concluded up to this point. The TSOs further confirm that stakeholder involvement is crucial in the development of the new

		<p>implementation of the NBC going forward. This will require a more proactive involvement of stakeholders in the development and implementation process. Among other things, the TSOs should justify and explain working plans, time-tables and SOGL compliance issues, challenges and opportunities for market players and implementation strategy. A step by step implementation of NBC is a probable starting point given the complexity and need to gain experience.</p> <p>Up to now the stakeholders have not been sufficiently involved, and a continuation of this practice will not only hurt the implementation of the NBC but may also backfire on the TSOs in the long run.</p>	<p>Nordic Balancing model and will be an important part of the development process.</p>
16	Energy Norway - Association	<ul style="list-style-type: none"> • <i>Coordination actions aiming to reduce FRCE and measures to reduce FRCE by requiring changes in the active power production or consumption of power generating modules and demand units:</i> <ul style="list-style-type: none"> o It should be stated in Article 3.1 b and c that these measures should only be used in alert state. 	<p>Comment acknowledged and did not result in a change of the proposals. The TSOs note that the measures are required to prevent for the alert state. <i>The TSOs also refer to their response to item no. 10.</i></p>
18	Finnish Energy	<p>Overall, we are disappointed with the lack of detail and absence of actual methodologies across all four proposals. According to Article 6(3) (d-e) of the SOGL, the four proposals consulted upon are supposed to contain the actual methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. We find these methodologies and conditions fundamentally lacking in the current proposals and hence that the proposals are not compliant with SOGL We are also disappointed that these methodologies haven't been prepared in cooperation with the stakeholders and underline that stakeholders must be included in the preparatory process from an early phase.</p> <p>The current proposals will delay the Nordic integration by trying to postpone important decisions to the future implementation of a new Nordic balancing model. Furthermore, the proposals will render the Nordic countries non-compliant with the SOGL, which the TSOs explicitly recognize in the Explanatory Document on FRR dimensioning rules, by stating that "The proposal presented in section 6 of this document does not comply to the requirements in Article 157 of the SO Regulation in all aspects. [...] The TSOs have agreed on an approach for a new Nordic balancing model. Within the implementation process, the TSOs are developing a FRR dimensioning process which will comply with the requirements in Article 157 of the SO Regulation. Once defined, the TSOs will start an amendment process to this proposal."</p> <p>We can only conclude that the Nordic TSOs are fully aware of the insufficiencies of the current proposals and find it odd they have nonetheless decided to consult upon them. Our major concern is that that Nordic TSOs are about to shift decision-making on the relevant methodologies to their parallel initiative on new Nordic balancing - with weakly</p>	<p><i>The TSOs refer to their response to item no. 2.</i></p>

		<p>defined and non-legally binding implementation timelines – instead of complying to the process laid out in the SOGL.</p> <p>For to follow SOGL, and remain amongst the leaders of regional power system integration in European, we urge TSOs to take the following specific comments on each of the four proposals into account:</p>	
21	Finnish Energy	<p><i>Coordination actions aiming to reduce FRCE and measures to reduce FRCE by requiring changes in the active power production or consumption</i></p> <p>The proposal closely mirrors the current coordinated actions available to Nordic TSOs and only new measure introduced – the possibility to “request immediate changes in the active power production or consumption of power generating modules and demand units within their control area” as per Article 4(a). While the other measures are well-known, it is unclear to us exactly what this intervention covers, what procedures will be followed, and how the compensation to affected units will be calculated. We strongly recommend that TSO specify this in the final proposal.</p> <p>We also recommend that the proposal explicitly restricts the situations in which TSOs are allowed to make use of the proposed measures. In the current proposal, the measures can be applied by TSOs in all situations where the LFC block FCRE violates SOGL Article 152(13) – i.e. every time a frequency deviation exceeds 50mHz for more than 30 consecutive minutes. While not very common, such a deviation is in our view not sufficiently extraordinary to justify a TSO non-market intervention with the proposed measures. As this issue is also recognized by TSOs in the Explanatory Document, we suggest that the final proposal includes an explicit exemption from SOGL Article 152(13) for to avoid any doubt as to when and how TSOs can interfere in the market.</p>	<i>The TSOs refer to their response to item no. 9 and no. 10.</i>
23	Finnish Energy	<p>In sum, we are surprised and disappointed that TSOs seemingly have chosen to evade the SOGL requirements and submit four proposals with little actual substance for consultation. We strongly urge TSOs to significantly revise the four proposals in line with our comments above, most importantly by adding substance and details on the envisaged methodologies in order to bring them into compliance with the SOGL, before submitting them for final NRA approval.</p>	<i>The TSOs refer to their response to item no. 12.</i>
24	Kemijoki Oy	<p>Regarding "1. Actions aiming to reduce FRCE (art 152(14) and (16)).pdf":</p> <p>- "Emergency state" should be clearly defined. More TSO control over generation units to avoid "emergency state" is appropriate if and only if the use of that control is well supervised. The use of control shall be later reported shortly in public and thoroughly to all relevant parties.</p>	<p>Comment acknowledged and did not result in a change in the proposal. Article 3(1)(37) and 18(3) of the SO Regulation define 'Emergency state'. The Emergency and Restoration Code (ER Code) further details the 'Emergency state'. The TSOs refer to these articles and the ER Code.</p>

32	Swedenergy	<p>Overall, we like to raise our concerns with the level of detail in the current proposals. According to Article 6(3)(d-e) of the SO Regulation the four proposals consulted should include descriptions of methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. In our view the current proposals are quite general, and the methodologies and conditions still need to be developed and specified. It is important to take part of these details to be fully able to assess consequences and costs.</p> <p>We are aware of the time constraints and other ongoing processes linked to the development of these methodologies and conditions. Nevertheless, we would have liked to see that the methodologies had been prepared in cooperation with the stakeholders. We would like to underline that stakeholders must be included in the preparatory process from an early phase. Nordic TSOs have the possibility to lead the way in European integration. The current proposals can lead to a delay of Nordic integration by postponing important decisions to the future implementation of a new Nordic balancing model, for which the detailed implementation deadlines are unknown and not legally-binding.</p> <p>We therefore strongly encourage the TSOs to start discussions with stakeholders and to revise the four proposals in line with our comments, before submitting them for final NRA approval.</p> <p>We have the following specific comments to each of the four proposals:</p>	<i>The TSOs refer to their response to item no. 2.</i>
33	Swedenergy	<p>Coordination actions aiming to reduce FRCE and measures to reduce FRCE by requiring changes in the active power production or consumption The current proposal mainly presents the current coordinated actions available to Nordic TSOs with one new measure introduced – the possibility to “request immediate changes in the active power production or consumption of power generating modules and demand units within their control area” as stated in Article 4(a). While the other measures are well-known, it is unclear to us exactly what this new measure covers, which procedures to be followed, and how the compensation for affected units will be calculated. We could therefore like to see this specified in the final proposal and be given the opportunity to provide comments. We would strongly appreciate further communication about these details.</p> <p>We would also recommend that the proposal includes explanations/restrictions of the situations in which TSOs can make use of the proposed measures. In the current proposal, the measures can be applied by TSOs in all situations where the LFC block FCRE violates SOGL Article 152(13) – i.e. every time a frequency deviation exceeds 50mHz for more than 30 consecutive minutes. Even though this is not very common, we believe that such a deviation is not sufficiently extraordinary to justify a TSO non-market intervention with the proposed measures. This issue is also recognized by TSOs in the</p>	<i>The TSOs refer to their response to item no. 9 and no. 10.</i>

		Explanatory Document. We therefore suggest that the final proposal includes an explicit exemption from SOGL Article 152(13) to avoid any doubt as to when and how TSOs can interfere in the market	
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