
**Explanatory document for the amended Nordic synchronous area
proposal for additional properties of FCR in accordance with Article
154(2) 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 the additional properties of Frequency Containment Reserves (FCR) for the Nordic synchronous area. Pursuant to Article 118(1)(b) of the SO Regulation, all Transmission System Operators in the Nordic Synchronous Area shall jointly develop common proposals for additional properties of FCR in accordance with Article 154(2) of the SO Regulation.

According to Article 6(3)(d)(iii) of the SO Regulation the proposal for additional properties of FCR in accordance with Article 154(2) shall be submitted for approval by the relevant national regulatory authorities (hereinafter “NRAs”) no later than 14 September, 2018. The proposal¹ has been submitted for regulatory approval to all NRAs in the Nordic synchronous area by 14 September, 2018. According to Article 6(6) of the SO Regulation the proposal has been submitted to ACER as well, who may issue an opinion on the proposal if requested by the NRAs. On 14 March 2019, the Nordic NRAs approved the proposal.

In accordance with article 153(2) of the SO Regulation, the Nordic TSOs need to implement downward FCR-D. The additional properties of downward FCR-D had not yet been included in the proposal for additional properties of FCR that has been approved by the NRAs on 14 March 2019. This amended proposal (hereafter referred to as “**Proposal**”) adds the additional properties of downward FCR-D in article 4a. Furthermore, the Proposal deletes article 4.3 from the proposal that has been approved by the NRAs on 14 March 2019. Chapter 5 explains these proposed amendments.

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 starts with describing the objective of the additional properties of FCR. Chapter 4 provides an overview of the existing situation. Chapter 5 explains the proposed amendments. Chapter 6 describes an outlook to future developments. The proposed additional properties of FCR are described in Chapter 7. Chapter 8 describes the expected impact on the relevant objectives of the SO Regulation. Finally, Chapter 9 provides the timeline for implementation and Chapter 10 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 118(1)(b) and (2) of the SO Regulation constitutes the legal basis that the Proposal should take into account. Article 118 has the following content:

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

¹ ‘Nordic synchronous area proposal for additional properties of FCR in accordance with Article 154(2) of the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation’, dated 10 September 2018.

(b) additional properties of FCR in accordance with Article 154(2); [...]

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

(2) Article 154(2) of the SO Regulation has the following content:

“ Article 154 FCR technical minimum requirements

[...]

2. All TSOs of a synchronous area shall have the right to specify, in the synchronous area operational agreement, common additional properties of the FCR required to ensure operational security in the synchronous area, by means of a set of technical parameters and within the ranges in Article 15(2)(d) of Commission Regulation No [000/2015 RfG] and Article 27 and 28 of Commission Regulation No [000/2015 DCC]. Those common additional properties of FCR shall take into account the installed capacity, structure and pattern of consumption and generation of the synchronous area. The TSOs shall apply a transitional period for the introduction of additional properties, defined in consultation with the affected FCR providers.

[...]”

(3) Article 154(1) and Annex V of the SO GL Regulation specify the minimum technical requirements for FCR that shall be ensured by each reserve connecting TSO:

“Article 154 FCR technical minimum requirements

1. Each reserve connecting TSO shall ensure that the FCR fulfils the properties listed for its synchronous area in Table 1 of Annex V.

[...]”

ANNEX V

FCR technical minimum requirements referred to in Article 154:

Minimum accuracy of frequency measurement	CE, GB, IRE and NE	10 mHz or the industrial standard if better
Maximum combined effect of inherent frequency response insensitivity and possible intentional frequency response dead band of the governor of the FCR providing units or FCR providing groups.	CE	10 mHz
	GB	15 mHz
	IRE	15 mHz
	NE	10 mHz
FCR full activation time	CE	30 s
	GB	10 s
	IRE	15 s
	NE	30 s if system frequency is outside standard frequency range
FCR full activation frequency deviation.	CE	±200 mHz
	GB	±500 mHz
	IRE	Dynamic FCR ±500 mHz
		Static FCR ±1000 mHz
	NE	±500 mHz

Table 1 FCR properties in the different synchronous areas

- (4) Article 15(2)(d) of Regulation (EU) 2016/631 (“*network code on requirements for grid connection of generators*”) provides a number of requirements (ranges) that shall be met by Type C and Type D power-generating modules “*when frequency sensitive mode (‘FSM’) is operating*”. These include ranges of the “*Active power range related to maximum capacity*”, “*Frequency response insensitivity*”, “*Frequency response deadband*”, “*Droop*”, “*Active power frequency response capability*”, “*initial activation of active power frequency response*” and the requirement that “(v) *the power-generating module shall be capable of providing full active power frequency response for a period of between 15 and 30 minutes as specified by the relevant TSO.*”. Furthermore, “(vi) *within the time limits laid down in point (v) of paragraph 2(d), active power control must not have any adverse impact on the active power frequency response of power-generating modules;*”.
- (5) Articles 27 and 28 of Regulation (EU) 2016/1388 (“*network code on demand connection*”) describe requirements for demand units to provide demand response services to system operators, including “*autonomously controlled demand response system frequency control*”. More specifically, Article 28 of Regulation (EU) 2016/1388 stipulates the “*specific provisions for demand units with demand response active power control, reactive power control and transmission constraint management*”. These provisions relate to operating capability across frequency ranges and voltage ranges, requirements related to receiving and executing instructions, controlling and adjusting power consumption, and requirements for maintaining the modification to power consumption.

(6) Article 6(3)(d)(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: [...]

(d) methodologies, conditions and values included in the synchronous area operational agreements in Article 118 concerning:

(iii) additional properties of FCR in accordance with Article 154(2);

2.2 Interpretation and scope of the Proposal

The Nordic Frequency Containment Process (FCP) currently applies two types of Frequency Containment Reserves (FCR). FCR for normal operation (FCR-N) is used for continuous imbalances to keep the frequency within the ± 100 mHz range. In conjunction with a rapid frequency change to 49.90/50.10 Hz, FCR-N shall be up regulated/down regulated within 2-3 minutes. The purpose of FCR for disturbance situations (FCR-D) is to mitigate the impact of incidental disturbances once the frequency is below 49.90 Hz or above 50.10 Hz. Upward FCR-D shall be fully activated if the frequency stabilises at 49.50 Hz and downward FCR-D shall be fully activated if the frequency stabilises at 50.50 Hz. In the event of a frequency drop to 49.50 Hz or a frequency increase to 50.50 Hz which is caused by a momentary loss, FCR-D shall be fully activated within 30 seconds. It has to be noted that the *FCR full activation frequency deviation* of ± 500 mHz and *FCR full activation time* of 30 seconds that are specified in Annex V of the SO GL Regulation only apply to FCR-D. Consequently, the TSOs specify the required FCR-N response as additional properties in this proposal. The other two requirements in Annex V of the SO GL Regulation apply to both FCR-N and FCR-D.

3. Objective of additional properties of FCR

The objective of the additional properties of FCR is to complete the set of minimum requirements in Annex V of the SO Regulation for both FCR-N and FCR-D as required for secure operation of the Nordic synchronous area.

4. The existing situation

In this chapter, the existing requirements for FCR are presented. Since the Nordic TSOs apply two types of FCR, section 4.1 addresses FCR-N and section 4.2 addresses FCR-D.

4.1 Frequency Containment Reserves for normal operation (FCR-N)

FCR-N is the momentarily available active power available for frequency regulation in the range of 49.9 – 50.10 Hz and which is activated automatically by the system frequency. Currently, FCR-N reserves shall be at least 600 MW at 50.00 Hz in the synchronous system. It shall be fully activated at $f = 49.90/50.10$ Hz ($\Delta f = \pm 0.10$ Hz). In conjunction with a rapid frequency change to 49.90/50.10 Hz, the reserve shall be up regulated/down regulated within 2-3 minutes.

4.2 Frequency Containment Reserves for disturbance situations (FCR-D)

Currently, the TSOs only apply FCR-D in upward direction (upward FCR-D). Upward FCR-D is the momentarily available active power available for frequency regulation in the range of 49.90 – 49.50 Hz and which is activated automatically by the system frequency.

Upward FCR-D shall be activated at 49.90 Hz and shall be fully activated at 49.50 Hz. It shall increase linearly or close to linearly within a frequency range of 49.90-49.50 Hz.

In the event of a frequency drop to 49.50 Hz:

- 50 % of the upward FCR-D frequency controlled disturbance reserve in each subsystem shall be regulated upwards within 5 seconds;
- 100 % of the upward FCR-D frequency controlled disturbance reserve shall be regulated upwards within 30 seconds.

5. Proposed amendments

This section discusses the amendments to the proposal of 10 September 2018 that has been approved by the NRAs on 14 March 2019¹. Section 5.2 describes the addition of article 4a including the additional properties for downward FCR-D. Section 5.3 discusses removing article 4(3).

5.1 Change in article 4 - Upward FCR-D additional properties

For clarity reasons, ‘virtual linearity’ is changed to ‘linearly or close to linearly’.

5.2 Add article 4a - Downward FCR-D additional properties

In accordance with article 153(2) of the SO Regulation, the TSOs need to implement downward FCR-D.

Reference incidents in positive direction have similar but opposite effects on the system frequency as reference incidents in negative direction. For that reason, the proposed requirements for downward FCR-D mirror the current requirements for FCR-D upwards (see section 7.2).

5.3 Remove article 4(3)

Article 4(3) allows the TSOs - under some conditions - to count agreed automatic load reduction in the event of frequency drops to 49.50 Hz as part of the upward FCR-D reserve. The TSOs do not consider this allowance necessary anymore, since load is allowed to participate if they fulfil the stated requirements. In order to make this methodology ‘technology neutral’, the TSOs propose removing article 4(3).

6. Outlook

After intensive analysis and measurement programs, the TSOs concluded that the existing requirements for both FCR-N and FCR-D do not necessarily meet the needs of the Nordic power system anymore. For this reason, the TSOs are in the process of defining more appropriate requirements that shall improve the effectiveness of both FCR-N and FCR-D. The TSOs foresee in the near future that changes and additions to the additional FCR properties are required. When a proposal for further requirements is developed the TSOs will start an amendment process.

7. Proposal for additional FCR properties

Together with the requirements in Annex V of the SO Regulation, the proposed additional properties for FCR-N and upward FCR-D in section 7.1 and 7.2 form the same set of requirements as currently applied (see section 4.1 and 4.2). As discussed in chapter 6, these requirements do not necessarily meet the needs of the Nordic power system anymore and may need to be modified. Since the new requirements need to be defined carefully and in close cooperation with potential providers of FCR-N and FCR-D, the TSOs decided not to rush the implementation of new requirements. Furthermore, the TSOs did not opt for partly changing the requirements because that could mean that FCR providers should adapt their FCR providing units and/or FCR providing groups twice. For this reason, the additional properties for FCR-N and upward FCR-D below only include the existing requirements that are not covered by the requirements specified in the SO Regulation. As discussed in section 5.2, additional properties for *downward* FCR-D have been added because the TSOs need to implement downward FCR-D. It may be noted that the reasons for the existing requirements are largely historical and may – as suggested above – be outdated.

7.1 Additional FCR-N properties

As discussed in section 2.2, for FCR-N, Annex V of the SO GL Regulation specifies the *Minimum accuracy of frequency measurement* and the *Maximum combined effect of inherent frequency response insensitivity and possible intentional frequency response dead band of the governor of the FCR providing units or FCR providing groups*. Conversely, for FCR-N, SO GL Regulation does not specify the *FCR full activation frequency deviation* and the *FCR-N full activation time*. These two properties will be deducted from existing requirements in section 7.1.1 and 7.1.2.

7.1.1 FCR full activation frequency deviation

Since FCR-N is used for continuous imbalances to keep the frequency within the ± 100 mHz range, FCR-N shall be fully activated at $f = 49.90/50.10$ Hz ($\Delta f = \pm 0.10$ Hz). This implicitly means that the *FCR full activation frequency deviation* for FCR-N is ± 100 mHz, which is proposed in Article 3(1) of the Proposal.

7.1.2 FCR-N full activation time

FCR-N shall – in conjunction with a rapid frequency change to 49.90/50.10 Hz - be up regulated/down regulated within 3 minutes which is proposed in Article 3(2) of the Proposal.

Both the full activation frequency deviation and the full activation time are within the ranges in Article 15(2)(d) of Commission Regulation No [000/2015 RfG] and Article 27 and 28 of Commission Regulation No [000/2015 DCC].

7.2 Additional upward FCR-D properties

For FCR-D, Annex V of the SO GL Regulation specifies the *full activation frequency deviation* (± 500 mHz) and the *full activation time* (30 seconds). However, SO GL Regulation does not specify other requirements that are important for the Nordic synchronous area. These issues are addressed in section 7.2.1 and 7.2.2.

7.2.1 Linear or close to linear increase between 49.90 and 49.50 Hz

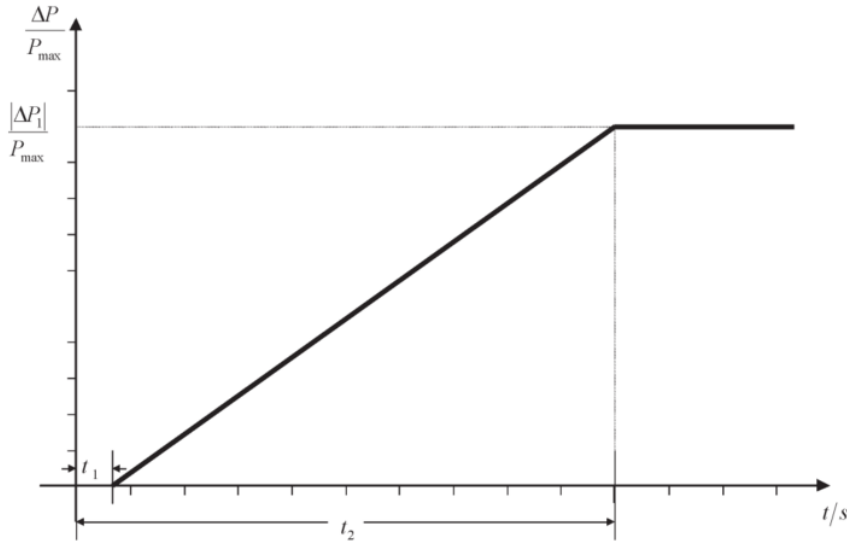
The existing rules for upward FCR-D include the requirement that activation shall increase linearly or close to linearly within a system frequency range of 49.90-49.50 Hz. This should give the most stable control. This requirement is proposed in Article 4(1) of the Proposal.

7.2.2 50% of the FCR-D response shall be available within 5 seconds

The existing rules for FCR-D require that in the event of a frequency drop to 49.50 Hz caused by a momentary loss of production 50 % of the upward FCR-D shall be regulated upwards within 5 seconds. This requires a faster response than required by Article 15(2)(d)(iii) of Commission Regulation No [000/2015 RfG] which states that “*in the event of a frequency step change, the power-generating module shall be capable of activating full active power frequency response, at or above the full line shown in Figure 6 [..].*”.

Figure 6

Active power frequency response capability



This Figure 6 shows that it is only required to reach 50 % of the activation far later than the current requirement of 50 % within 5s. Since especially at times of low inertia in the Nordic synchronous area a fast FCR-D response is required², the TSOs consider relaxing the current requirement unacceptable for operational security reasons. For that reason, the TSOs propose keeping the existing requirement that “50 % of the upward FCR-D in each subsystem shall be regulated upwards within 5 seconds;”. Article 4(2) of the Proposal reflects this position.

7.3 Additional downward FCR-D properties

Reference incidents in positive direction have similar but opposite effects on the system frequency as reference incidents in negative direction. For that reason, the proposed requirements for downward FCR-D mirror the current requirements for FCR-D upwards (see section 7.2).

7.4 Summary

The arguments in section 7.1 result in the additional properties for FCR-N in Article 3 of the Proposal:

1. FCR-N shall be fully activated at $f = 49.90/50.10$ Hz ($\Delta f = \pm 0.10$ Hz). FCR full activation frequency deviation for FCR-N is ± 100 mHz.
2. In conjunction with a rapid system frequency change to 49.90/50.10 Hz, FCR-N shall be up regulated/ down regulated within 3 minutes.

² to prevent for automatic Under Frequency Load Shedding in case of large instantaneous imbalances.

The arguments in section 7.2 result in the additional properties for upward FCR-D in Article 4 of the Proposal:

1. Upward FCR-D shall be activated at 49.90 Hz and shall be fully activated at 49.50 Hz. It shall increase linearly or close to linearly within a system frequency range of 49.90-49.50 Hz.
2. In the event of a system frequency drop to 49.50 Hz:
 - 50 % of the upward FCR-D shall be regulated upwards within 5 seconds;
 - 100 % of the upward FCR-D shall be regulated upwards within 30 seconds.

The arguments in section 7.3 result in the additional properties for downward FCR-D in Article 4a of the Proposal:

Article 4a – Downward FCR-D additional properties

1. Downward FCR-D shall be activated at 50.10 Hz and shall be fully activated at 50.50 Hz. It shall increase linearly or close to linearly within a system frequency range of 50.10-50.50 Hz.
2. In the event of a system frequency increase to 50.50 Hz:
 - 50 % of the downward FCR-D shall be regulated downwards within 5 seconds;
 - 100 % of the downward FCR-D shall be regulated downwards within 30 seconds.

8. 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; and
- Article 4(1)(h) contributing to the efficient operation and development of the electricity transmission system and electricity sector in the Union.

The Proposal contributes to these objectives by specifying the additional rules for FCR-N and FCR-D, which are key reserves that are used in the common Nordic load-frequency control processes. The additional properties are required to maintain the operational security by reducing the risk for automatic Low Frequency Demand Disconnection (LFDD) and for system blackouts due to under or over frequency. The additional properties balance the impact of both cost for FCR and outage risk and therefore ensure efficient operation of the electricity transmission system.

9. Timescale for the implementation

Additional properties for both FCR-N and upward FCR-D - as approved by the Nordic NRAs on 14 March 2019 - have been implemented in the Nordic synchronous area.

The TSOs shall start implementation of Article 4a as soon as this amended proposal has been approved by all Nordic NRAs. The implementation will start with pre-qualification tests for downward FCR-D.

10. 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 April 2020 to 1 May 2020. 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
1	Energi företagen Sverige / Swedenergy	Swedenergy supports the development of the proposal, and we believe that the previous stakeholder dialogue has led to positive improvements of the proposal. The ambition must be to achieve rational and sensible requirements that support a secure system in a cost-efficient manner for society and end customers. To this end, we strongly encourage the continuation of the already running dialogue on Nordic technical requirements between FCR providers and the Nordic TSOs. We are convinced that this dialogue is a necessity and has the potential to meet the future system requirements in an efficient manner.	Comment acknowledged and did not result in a change of the proposal. Providers have been involved in discussions and tests of new requirements and will also be involved in future. Also the TSOs are convinced that this dialogue is a necessity.
2	Energi företagen Sverige / Swedenergy	In a previous consultation, we specified that a requirement corresponding to 30% within 5 seconds and to 50% within 30 seconds as more reasonable for the safe operation of the Nordic synchronous system. This is still our opinion and it should also apply to downward FCR-D. We encourage the TSOs to use the stakeholder dialogue on technical requirements for FCR that is already underway as a forum for establishing cost-effective and secure technical requirements.	Comment acknowledged and did not result in a change of the proposal. This amended proposal extends the proposal that has been approved by the NRAs in 2019 with requirements for downward FCR-D. The work on new specifications of FCR-N and FCR-D is ongoing and includes a stakeholder dialogue. The resulting new requirements will eventually be included in another amendment to this proposal that must be publicly consulted, approved by the NRAs and implemented accordingly.
3	Energi företagen Sverige / Swedenergy	The proposal indicate that the regulatory framework allow for that the "powergenerating module shall be capable of providing full active power frequency response for a period of between 15 and 30 minutes as specified by the relevant TSO." We encourage the Nordic TSOs to make clear which option is preferred. With the potential from the demand side a standard of 15 minutes would be most suitable.	Comment acknowledged and did not result in a change of the proposal. The comment relates to a different consultation, i.e. on the "All CE and Nordic TSOs' results of CBA in accordance with Art.156(11) of the Commission Regulation (EU) 2017/1485 of 2 August 2017" report, which was consulted on until 30 April 2020 at the ENTSO-E consultation hub.
4	Energi företagen Sverige / Swedenergy	Furthermore, the requirement under Article 4a says: "Downward FCR-D shall be activated at 50.10 Hz and shall be fully activated at 50.5 Hz. It should increase almost linearly within a system frequency range of 50.10-50.50 Hz." We want to emphasize that incremental regulation within the "blue zone" should be ok. This too is crucial to allow for a cost efficient development of contributions from aggregated resources from the demand side.	Comment acknowledged and did not result in a change of the proposal. The interpretation of the linearity requirement for Downwards FCR-D will be analogous to the corresponding requirement for Upward FCR-D. The "blue-zone" refers to an illustration in the current Swedish agreement regarding Upwards FCR-D from stepwise responses. A corresponding figure will be developed for Downwards FCR-D.

5	Energi företagen Sverige / Swedenergy	We also ask for a clarification of the concept virtual linearity referred to in article 4.1	Comment acknowledged and resulted in a change of article 4 and 4a and section 4.2, 5.1, 7.2.1 and 7.4 of the explanatory document. Linearity is part of the assessment made during the prequalification process. The prequalification are considered a national responsibility.
6	Vattenfall	Generally, Vattenfall supports the development of the proposal, and we believe that the previous stakeholder dialogue has led to positive improvements of the proposal. As previously expressed, our ambition is to achieve rational and sensible requirements that support a secure system in a cost efficient manner for society and end customers. To this end, we strongly encourage the continuation of the already running dialogue on Nordic technical requirements between FCR providers and the Nordic TSOs. We are convinced that this dialogue has the potential to meet the future system requirements in an efficient manner.	Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 1.
7	Vattenfall	Same restrictions on response times applies to FCR-d (down) In article 4 the additional properties for FCR-D are set to: should be activated to 50% within 5 seconds and to 100% within 30 seconds. As previously stated (response by Swede Energy) a requirement corresponding to "30% within 5 seconds and to 50% within 30 seconds" is regarded as more reasonable for the safe operation of the Nordic synchronous system. We would hereby like to confirm that this objection also applies to the product FCR-d down, and we want to encourage the TSOs to use the stakeholder dialogue on technical requirements for FCR that is already underway as a forum for establishing cost-effective and secure technical requirements.	Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 2.
8	Vattenfall	The proposal indicate that the regulatory framework allow for that the "powergenerating module shall be capable of providing full active power frequency response for a period of between 15 and 30 minutes as specified by the relevant TSO." We encourage the Nordic TSOs to make clear which option that is preferred. With the potential from the demand side a standard of 15 minutes would be most suitable.	Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 3.

9	Vattenfall	<p>Furthermore, the requirement under Article 4a says: "Downward FCR-D shall be activated at 50.10 Hz and shall be fully activated at 50.5 Hz. It should increase almost linearly within a system frequency range of 50.10-50.50 Hz." We want to emphasize that incremental regulation within the "blue zone" should be ok. This too is crucial to allow for a cost efficient development of contributions from aggregated resources from the demand side.</p>	<p>Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 4.</p>
10	Vattenfall	<p>We ask for a clarification of the concept virtual linearity referred to article 4.1.</p>	<p>Comment acknowledged and resulted in a change of article 4 and 4a and section 4.2, 5.1, 7.2.1 and 7.4 of the explanatory document. The TSOs further refer to response to item no. 5.</p>
11	Statkraft	<p>Statkraft is in favour of measures that supports well-functioning energy markets, and we welcome the new product Downward FCR-D. However, the proposed additional properties of FCR cannot be applied without consequences. Delivering Downward FCR-D would require changes to turbine governors in most of our power plants, both in Norway and Sweden.</p> <p>For power plants in Norway it is possible to adjust or replace turbine governors to comply with the proposed properties of FCR, but not without compromising the Norwegian requirements "Funksjonskrav i Kraftsystemet" of 2012, also known as "FIKS 2012". If Statnett applies the proposed additional properties of FCR on individual units, Norway will lose most of its FCR-N and all its FCR-D capacity.</p> <p>Comments to Article 5 – Publication and implementation: Regarding paragraph 2; "The TSOs have already implemented all articles except for Article 4a." The Norwegian FCR requirement «Vilkår for tilbud, aksept, rapportering og avregning i marked for FCR» refers to FIKS 2012. FIKS 2012 is not compliant with the activation time requirements stated in the proposed additional properties of FCR Article 3-2, 4-2 and 4a-2 caused by sudden drop in frequency.</p>	<p>Comment acknowledged and did not result in changes to the proposal. Statnett recognizes that changes in FCR specifications will require changes also for providers and that such changes will have to be done in close cooperation with providers and according a long term plan for changes. In the previous Nordic System Operation Agreement, the requirements for activation time for FCR was specified on national level. As Norway has a delivered volume which is far above the national requirement and delivery from many units, the total Norwegian delivery have no problem with delivering sufficient volumes within the requirements for activation time even if this may be the case on unit level. SOGL does however require that requirements for activation time shall be followed on unit level and this mean that new considerations have to be made.</p> <p>The Nordic TSOs are working on defining new FCR specifications in a project where stakeholders are invited in a reference group. These new requirements will be implemented in the next few years and Statnett will avoid to change the specifications twice within a short period. Consequently, in Norway, new requirements for activation times will not be implemented before the work with the go through of the whole Frequency Containment Process is finished.</p>

	<p>According to FIKS 2012 section 3.2 Vannkraft, the turbine governor shall use the same mode and use the same PID-parameters connected to the grid as it will use in island mode operation. Also, as described in FIKS 2012 section 3.2 Vannkraft under heading Frekvens: Turbinregulator bullet point Parametrisering: «Overordnet krav er maksimalt 30 s for frekvensen å nå stasjonært statisk avvik etter en momentan effektubalanse (utfall av aggregat el.l.). Dette gjelder hele nettet og aggregat enkeltvis i lokal drift. Normalt vil detaljkravene i kapittel 7 oppfylle denne betingelsen»</p> <p>The 30 s refers to the net and not any individual units. Neither does it mean that the unit shall fully activate FCR within 30 seconds caused by a sudden drop in frequency as defined in the amended proposal. No Norwegian hydro power unit parameterised according to FIKS 2012 is capable of fully activating FCR as described in the amended proposal within 30 seconds.</p> <p>Comments to Article 3 – FCR-N additional properties: Regarding paragraph 2; “In conjunction with a rapid system frequency change to 49.90/50.10 Hz, FCR-N shall be up regulated/ down regulated within 3 minutes.”</p> <p>The FCR activation time in Norwegian hydro power units is dependent on the speed droop value. A Unit classified as good in FIKS 2012 Table 7.1 (Kp=3 and Ti= 8) will use 3 minutes to activate all FCR-N at speed droop 8 %. It will take more than 3 minutes if the speed droop is less than 8 %. An average unit (Kp=2,5 and Ti=10) cannot have speed droop less than 10 % to activate all FCR-N within 3 minutes.</p> <p>Comments to Article 4 – Upward FCR-D additional properties: Regarding paragraph 2; “In the event of a system frequency drop to 49.50 Hz:</p> <ul style="list-style-type: none"> • 50 % of the upward FCR-D shall be regulated upwards within 5 seconds; • 100 % of the upward FCR-D shall be regulated upwards within 30 seconds.” <p>Norwegian units do not use a separate mode for FCR-D. According to FIKS 2012 and «Vilkår for tilbud, aksept, rapportering og avregning i marked for FCR» this is not allowed. Most of the Norwegian units do not have</p>	<p>The Statkraft comments can be bulked in two main challenges:</p> <ul style="list-style-type: none"> •The "Additional properties for FCR" and the current national connection grid code (FIKS 2012) are contradicting, and; •The application of "Additional properties for FCR" is defined on unit level. <p>The technical requirements for FCR will be further developed on Nordic level to ensure common harmonized interpretations on national level. This is discussed in the Frequency Containment Process project, where sub projects (feasibility, pilot and transition) are being performed from 2020 and onwards. Additionally, the Norwegian connection grid code must be updated in such a way that it doesn't overlap the technical requirements in terms of frequency response. The latter was finalized by Statnett Q2 2020 and is currently awaiting NRA approval. This will mitigate the first problem highlighted by Statkraft.</p> <p>In the short term, the plan for the new FCR-D Downwards is to mirror FCR-D Upwards. This includes technical requirements, procurement processes, market design and settlement. Statnett plan to use the FCP-projects as the framework for reaching compliance on unit level, although a transition period must be expected.</p> <p>To conclude, there are no immediate need for Statkraft or other Norwegian stakeholders to change their governor settings or operation now to reach other requirements for response time on FCR-N and -D on unit level. The frequency response will continue to be determined by the Norwegian TSO decision ("Vilkår om leveranse av systemtjenester"), as part of the procurement process aiming to distribute frequency response, until the harmonized requirements are finalized and implemented.</p>
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12	Statkraft	<p>Statkraft supports the Frequency Containment Process (FCP) where the Nordic TSOs are collaborating to unify national FCR requirements for the Nordic power system. We hope for the FCP to bring clarity to the common Nordic requirements. We remain at your disposal should you need any elaboration on the above comments.</p>	<p>Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 1 and 2.</p>