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**Answers to SHADOW OPINION OF ALL REGULATORY  
AUTHORTIES OF THE HANSA CAPACITY CALCULATION REGION  
ON  
HANSA TSOS' DRAFT PROPOSAL FOR REGIONAL OPERATIONAL  
SECURITY COORDINATION  
in accordance with Article 76 of the Commission Regulation  
(EU) 2017/1485 of 2 August 2017 establishing a guideline on  
electricity transmission system operation  
15 November 2019**

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20 December 2019

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## 1. Introduction

The purpose of this document is to support the CCR Hansa ROSC methodology and provide more in-depth explanations on the issues that are covered by the methodology.

## 2. TSO answers

In the table below NRA comments in the shadow opinion are listed in one column and the corresponding answer from TSOs are listed in the other column. Readers should note that an article is added after article 11, i.e. a new article 12, in the methodology after public consultation for clarification. This moves forward the numbering and therefore all the numbers of articles referred to by NRA are not the same as in the final version submitted to NRAs.

#	NRA Comment	TSO response
1.	Introduced and defined terms should be used; especially concerning secured and scanned elements, in order to ensure a similar understanding and increase the readability. For example, in Hansa NRAs understanding art 11(7) refers to secured elements and art. 19 (5/8) to selected elements. Definitions should be aligned as much as possible with Core and Nordic ROSC since the RSCs are identical	The definition, in article 2, and use of the terms are aligned with the definition of Core ROSC Methodology. Articles 12(7) and 20(5) and 20(7) are updated as well as throughout the document.
2.	References should be used correctly; references should preferably be used to guidelines and network codes or already approved methodologies if required. For example references to RCCS Methodology and RCCSM later on are not clear (cf. art. 24(3), art. 25(2)).	The references to RCCS Methodology and RCCSM in articles 25(3) and 26(2) are clarified as well as throughout the document definitions are updated to be more consistent with already approved methodologies.
3.	ROSC should state remedial actions instead of the limitation to redispach and countertrade as it is explicitly foreseen in regulation (EU) 2015/1222 (CACM) for example in art. 17(2).	A reference to article 22 of SO Regulation is included in article 18(2) so all remedial actions are taken into account in the methodology. A distinction of costly remedial actions is entered in article 18(2) limiting these to <b>countertrading, redispaching and curtailment</b> .
4.	<u>Whereas (8)</u> : It seems to be a noble objective to align Hansa processes and requirements as much as possible with adjacent CCRs but the overall objective should be to ensure operational security in the own CCR. The requirements and obligations of Hansa RSCs should be clear and the rotating assignment of Core RSCs needs to be reflected. Otherwise ROSC for Hansa CCR could only be handled by an inter CCR- coordination.	The whereas section is updated with the addition of a new paragraph, paragraph 9, to clarify the roles of RSCs and TSOs. The main objective in the ROSC is the operational security of Hansa CCR as stated in whereas paragraph 6.
5.	<u>Art. 2(3)</u> : The term “assessed element” is not concrete enough. In NRAs understanding these are the elements on which operational security limit violations need to be solved within ROSC.	The term “assessed elements” isn’t used in the methodology. Article 2(3) is rephrased without the term.

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| <p>6. <u>Art. 2(4)</u>: The definition for selected elements is not concrete enough. They should and not may be included and monitored in the ROSC, please elaborate on “observation rules”. In NRAs understanding these are the elements on which ROSC shall not create new operational security limits violations or worsen existing violations (possibly considering an acceptable range). The term “selected elements” is not used in the proposal at all.</p> | <p>The definition in article 2(4) is changed according to NRA comment.</p>   |
| <p>7. <u>Art. 4(1)</u>: NRAs request the rules for governance of the RSC being part of the proposal pursuant to SO GL art. 77(1)(b). For NRAs the reference to Annex 1 is unclear, NRAs would welcome further reasoning for the appointment of two RSCs as well as further details on their cooperation.</p>   | <p>As discussed with NRA:s on 26:th of November a section in the explanatory document is added to clarify the governance of the RSC. The reference to Annex 1 is removed, the reasoning for appointing two RSC is described in the explanatory document.</p>                           |
| <p>8. <u>Art. 4(2)(b)</u>: For NRAs it is not clear if CROSA contains the task according to art. 77(3)(a)-(d) SO GL and how it can be differentiated between CROSA and the aforementioned ROSC.</p>  | <p>The wording in article 4(2)b is revised to clarify the tasks.</p>   |
| <p>9. <u>Art. 4(5)(b)</u>: NRAs would welcome further information, potentially in an explanatory document, to get a better understanding of the (coordination-) processes between RSCs and TSOs, as of such a “reasonable time” is not clear enough.</p>   | <p>The process is not time dependent and reasonable time is removed to avoid confusion.</p>  |
| <p>10. <u>Art. 7(2)(b)</u>: NRAs ask to elaborate on what is meant by pre-alignment service to determine the potential for the interconnections for the exchange of RAs. In general, RAs should be assessed using an RA influence factor, as stated in CSAM.</p>   | <p>An additional paragraph is introduced in article 18 and the text in article 7 is removed to clarify pre-alignment service.</p>  |
| <p>11. <u>Art. 10</u>: For NRAs it is unclear, what kind of data is exchanged and at which reporting periods as long as this is not already defined in CROSA or GMM.</p>   | <p>The purpose of article is to define that all parties shall respect national legislation of all parties in managing data from respective party. A section is added to the explanatory document on the topic. No changes is made in the methodology with regards to this comment.</p> |
| <p>12. <u>Art. 11</u>: The Numbering of this article is not in order, 2 is missing.</p>  | <p>The numbering in article 11 is updated.</p>   |
| <p>13. <u>Art. 11(3/4)</u>: The NRAs ask the TSOs/RSCs to use the times T0-T5 as defined in CSAM art (45) when describing the workflow of the DA-ROSC. The timing for the ID security coordination needs to be coordinated between the relevant RSCs. The TSOs/RSCs are asked to inform the NRAs about the process and status of this coordination. When the timings for the ID security coordination are agreed upon, the</p>                                     | <p>The reference is updated to article 45 of CSAM. A new article (article 12) is introduced. In this article it is stated that timings of the intraday regional operational security coordination process are to be published by RSCs of CCR Hansa on the ENTSO-E website.</p>         |

timings must be used to describe the workflow of the ID security coordination.

14. Art. 11(8): NRAs would welcome further information on the monitoring characteristics e.g. periods, monitoring addressees etc. The obligations arising from art. 42 and art. 16(3) regulation 2019/943 need to be considered also in art. 26 of this proposal. As discussed with NRAs on 26:th of November. Art 16(3) of 2019/943 refers to RCC which is not defined and therefore can't be taken into account. An update with regards to the monitoring characteristics is done in article 11(8).
15. Art. 13(1): In NRAs understanding, it needs to be ensured that all TSOs receive the latest information and the correct IGMs (CGMs respectively). Therefore communication should be established between RSCs and all TSOs if possible. This was discussed with NRAs on 26:th of November and it was clarified that this will be done in the enduring setup. Until the defined prerequisites are met for implementing the enduring setup the interim setup will facilitate the business process of the Hansa ROSC.
16. Art. 14: NRAs ask to further describe how secured elements are included as well as excluded in a coordinated and transparent process (supported by all TSOs). It seems unclear on which criteria RSCs will evaluate secured elements (cf. art. 14(6)). For Hansa CCR Secured elements are defined in article 16 and 15 as the inter-connectors, additional text was added in article 15 paragraph 2 to describe this. In the explanatory document the relation with Hansa CCR and Core and Nordic CCR is described.
17. Art. 14(2): NRAs find this to be misunderstanding since not all CNEs are necessarily secured elements. But according to CSAM, all XNE are secured elements and are therefore a subset of CNEs. Consequently, CNEs can be selected or secured elements. For Hansa CCR Secured elements are defined in article 16 and 15 as the inter-connectors. Hansa CCR is defined as the inter-connectors which are all CNEs and always included in the assessment.
18. Art. 17(3): For NRAs it remains unclear how TSOs consider and detect these constraints. These constraints seem to be a characteristic of the RA and should be known beforehand. It needs to be ensured that these constraints are applied uniformly between TSOs which could be ensured by an aligned RSC assessment. After the discussion with NRAs on 26:th of November NRAs asked when the preparation of remedial actions is done. Remedial actions are prepared to be exchanged between TSOs and RSCs according to the ROSC methodology.
19. Art. 17(4/5): In NRAs understanding the assessment for XRAs is not sufficient and should be further aligned with Core and Nordic CCRs. In case RAs are provided to more than one CCR/ RSC this should be transparent as stated in art. 16(1)(b) CSAM. Text clarifying this is added to article 18 and article 21 and 23.
20. Art. 18(5): For NRAs it remains unclear how RSCs can obtain non-XB relevant RAs from the provided XRA-lists. Costs for XRAs are taken into account for a potential cost sharing but ROSC can and in our understanding should solve also non-XB relevant security limits violations. Changes made in article 19 taking the comment into account.
21. Art. 20: For NRAs it is not transparent how the economic efficiency is assessed and in which cases merit order curves can be applied. Are these Changes are made to article 21 to define the merit order curve per border. A paragraph is added on the selection of most effective and

merit order curves provided per congestion, BZ or TSO and how are interdependencies between RAs and between congestions reflected in regard to an overall optimisation?

economically efficient remedial actions from the merit order curve.

22. Art. 23(5): NRAs ask to elaborate what is meant by temporal dependencies.
23. Art. 26: NRAs would welcome if TSOs kept NRAs informed on the implementation of the methodologies as well as their progress.

A definition of temporal dependencies is introduced in article 2.

TSOs and RSC are happy to provide NRAs with information during the implementation.