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# Evaluation of responses in NRA shadow opinion to Nordic regional operational security coordination methodology

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## 1. Introduction

On 25 October 2019, Nordic TSOs published the proposal for the *‘Nordic TSOs’ common methodology for regional operational security coordination in accordance with Article 76 and Article 77 of the “Commission Regulation (EU) 2017/1485 of 2 August 2017” establishing a guideline on electricity transmission system operation’* (hereafter referred to as ‘Nordic ROSC Methodology’ or ‘NROSC’ ) on ENTSO-E publication hub for the purpose of public consultation in accordance with article 11 of SO Regulation.

## 2. Responses

The public consultation of Nordic ROSC Methodology took place between 25 October and 25 November 2019. By the end of the public consultation period, Nordic TSOs received no official response but a shadow opinion of all national regulatory authorities (NRAs) of the Nordic capacity calculation region (Nordic CCR). The Appendix of this document provides a table with feedback from NRAs and responses of Nordic TSOs. This document will be submitted to NRAs of Nordic CCR together with the Nordic ROSC Methodology and NROSC Explanatory Document.

## Appendix: Responses of Nordic TSOs to NRA shadow opinion

NRA Shadow Opinion	TSO Response
<p>Whereas</p> <ul style="list-style-type: none"> <li>• Please consider whether you should mention the CEP regulation</li> </ul>	<p><u>NROSC was amended as following:</u></p> <p>Whereas (13): <i>Nordic ROSC Methodology may be amended and specified in the future considering the upcoming requirements from Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity.</i></p>
<p>Article 2</p> <ul style="list-style-type: none"> <li>• Art 2.1(b) CGMES, is not defined – please define CGMES</li> <li>• Art 2.2(b) “affected TSO” has another definition according to art 2.94 of the SO GL <ul style="list-style-type: none"> <li>○ If there is a definition in existing regulation, that should be used in the methodology. Please consider the definition in the SO regulation</li> </ul> </li> <li>• Art 2.2(c) “agreed remedial action”. The NRAs urge the TSOs to make sure the definition is aligned with the definition in CSAM art 2.19.</li> <li>• Art 2.2(r) The NRSOSC reference seems to be wrong, as NROSC art. 22 is about reporting. The NRAs urge the TSOs to correct the reference.</li> </ul>	<p><u>NROSC was amended as following:</u></p> <p>Art. 2(1)(d): <i>‘Common Grid Model Exchange Standard’ or ‘CGMES’ means the interface between ENTSO-E members’ software in order to exchange power system modelling information as required by the ENTSO-E and TSO business processes;</i></p> <p>Art. 2(1)(b): <i>‘affected TSO’ according article 3(2)(94) of SO Regulation ‘means a TSO for which information on the exchange of reserves and/or sharing of reserves and/or imbalance netting process and/or cross-border activation process is needed for the analysis and maintenance of operational security’. In the context of the cross-border activation process the term is specified for the purpose of Nordic ROSC Methodology as following:</i></p> <ul style="list-style-type: none"> <li><i>i. requesting TSO responsible for the operation of the control area where the violation of operational security limits is detected;</i></li> <li><i>ii. connecting TSO responsible for the control area where the remedial action is located or connected or activated;</i></li> </ul> <p>Art. 2(2)(c): <i>‘agreed remedial action’ according article 2(19) of CSAM ‘means a cross-border relevant remedial action for which TSOs in a region agreed to implement or any other remedial action for which TSOs have agreed that it does not need to be coordinated’</i></p> <p>Art. 2(1)(r): <i>‘Nordic RSC’ means the appointed regional security coordinator of Nordic CCR in accordance with Article 23 of NROSC;</i></p>

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<p>Article 3</p> <ul style="list-style-type: none"> <li>The processes in ROSC have similarities compared to the CACM Capacity Calculation Methodology (DA/ID CCM). Please consider the processes and data requirements in CACM CCM and the ROSC provisions to make sure that the two methodologies will not be conflicting with each other.</li> <li>Art 3.11. The NRAs suggest to add a description of what the acceptable reasons for rejecting the remedial action are. If the reason is that the remedial action does not fulfill the criteria in art 16.4, the NRAs suggest adding a reference to this.</li> <li>Art 3.3 should also refer to art 34 of the CSAM</li> </ul>	<p><u>NROSC was amended as following:</u></p> <p>Art. 3(4): <i>Nordic ROSC Methodology shall consider in day-ahead and intraday regional operational security coordination, where applicable, the relevant provisions of Nordic CCM and Nordic CRC Methodology.</i></p> <p>Art. 3(11): Paragraph 3(10) is removed and reference to Art. 16(4) was added.</p> <p>Art. 3(3): <i>Nordic TSOs and Nordic RSC shall perform the intraday regional operational security coordination at least three times in intraday timeframe in accordance with articles 24 and 34 of CSAM.</i></p>
<p>Article 4</p> <ul style="list-style-type: none"> <li>Art 4.1 and 4.2 concern the timelines for analyzing. The NRAs suggest that the TSOs examine the consequences of having different timing in different Capacity Calculation Regions for the analysis, and revising the timing in the proposal if necessary. The details could be explained in an explanatory document.</li> <li>Art 4.5 refer to art 31.3 which means that the business process hours of T0(ID) to T5(ID) for ID will be defined 18 months after approval of the NROSC? The NRAs urge the TSOs to clarify, what values will be used before that.</li> </ul>	<p>See details in NROSC Explanatory Document.</p> <p><u>NROSC was amended as following:</u></p> <p>Art. 4(5): <i>Nordic TSOs in coordination with Nordic RSC shall define the timings for intraday regional operational security coordination taking into account article 22 of CGMM-v3.</i></p> <p>Art. 4(6): <i>Nordic TSOs in coordination with Nordic RSC shall aim at synchronising the business process workflow and timings of Nordic intraday regional operational security coordination at least with TSOs and RSCs of adjacent CCRs in accordance with article 34 of CSAM to ensure coordination of the results between at least the adjacent CCRs.</i></p> <p>Art. 4(7): <i>Timings of the intraday regional operational security coordination process shall be published by Nordic RSC on the ENTSO-E website.</i></p>
<p>Article 6 - the ID coordination between CCR/RSCs</p> <ul style="list-style-type: none"> <li>As also covered by the ROSC proposal for CCR-Hansa art 11(4), the timing for the ID security coordination needs to be coordinated between the relevant RSCs.</li> <li>The NRAs would like to hear about the process and status of ID coordination between CCRs and how the timings stated in art 4.2 of the</li> </ul>	<p>See responses to Article 4 of NROSC and NROSC Explanatory Document</p>

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<p>Nordic ROSC proposal are to be understood. Are the timings coordinated, or what is the basis for selecting them?</p> <ul style="list-style-type: none"> <li>When the timings for the ID security coordination are agreed upon, the timings must be used to describe the workflow of the ID security coordination.</li> </ul>	<p>Article 6 of NROSC defines principles for the workflow for Nordic intraday regional operational security coordination.</p>
<p>Article 10</p> <ul style="list-style-type: none"> <li>Art 10.1. The proposal should include the valid reasons for adjusting the voltage level instead of just referring to “necessity”.</li> </ul>	<p>Requirement was removed. Voltage level is adjusted to 220 kV.</p> <p><u>NROSC was amended as following:</u>  Art. 10(2): <i>Secured elements shall at least include all CNEs of Nordic CCR in accordance with Nordic CCM and other network elements with a voltage level higher than or equal to 220 kV, except for those elements for which all Nordic TSOs agree that they are not cross-border relevant for Nordic CCR and may therefore be excluded.</i></p>
<p>Article 12</p> <ul style="list-style-type: none"> <li>The NRAs urge the TSOs to further clarify and explain how each TSO consider/detect constraints? Can the TSOs just state that there is a specific constraint, or does it need to be verified commonly at RSC?</li> </ul>	<p>The header of the article was amended as following: <i>“Consideration of constraints when preparing remedial actions”.</i></p>
<p>Article 14</p> <ul style="list-style-type: none"> <li>Art 14.3, acc to CSAM art 15(5) “... This threshold shall be equal to 5% unless a different threshold is justified and defined in the methodology for the preparation of remedial actions ... pursuant to Article 76(1) of the SO Regulation”. Could the TSOs explain what the criteria is to define a different threshold than 5%?</li> <li>Art 16.4(c) The term “warning state” should be defined</li> </ul>	<p><u>NROSC was amended as following:</u>  Art. 14(3): <i>The threshold of 5% in accordance with article 15(5) of CSAM shall be considered when assessing the cross-border relevance of a remedial action.</i></p> <p>Art. 16(4)(c): <i>the remedial action is not setting the affected Nordic TSO’s network in an alert or emergency state based on the common grid model used in the coordination process.</i></p>
<p>Article 16</p> <ul style="list-style-type: none"> <li>Art 16.4(e), how will the TSOs assess that (or what is the criteria) “the remedial action is considered as most effective and economically efficient to relieve the congestion”?</li> </ul>	<p><u>NROSC Explanatory Document:</u>  <i>Nordic TSOs will provide relevant information on technical effectiveness and costs of remedial actions to Nordic RSC. Nordic TSOs in coordination with Nordic RSC will optimize remedial actions in order to identify in a coordinated way the most effective and economically efficient remedial actions. The optimisation will aim at minimising costs for remedial actions and maximising the effectivity of a remedial action e.g. by computation of the flow sensitivity of a remedial action, localizing any remaining operational security limits violations, balancing the costs in order to</i></p>

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	<i>ensure the selection of the most economically efficient and technically effective remedial action. Costly remedial actions will only be chosen to relieve operational security limits violations. The outcome of such an optimisation will be a merit order of the most effective and economically efficient remedial actions.</i>
<p>Article 22</p> <ul style="list-style-type: none"> <li>Art 22.2 The reference to art 17 of the SO is not correct. Please correct the reference, as art 17 concerns “Annual report on regional coordination assessment”</li> </ul>	<p><u>NROSC was amended as following:</u>  <i>Nordic RSC shall record and share all necessary data to enable Nordic TSOs to fulfil the obligations regarding this Nordic ROSC Methodology, Nordic CRC Methodology, Nordic CRCCS Methodology and articles 17(2)(b) and 17(2)(c) of the SO Regulation.</i></p>
<p>Article 24</p> <ul style="list-style-type: none"> <li>Art 24.4, The descriptions regarding methodologies not replacing European and national laws seems futile. The NRAs urge the TSOs to reconsider the wording or removing it</li> <li>Art 24.5 should be elaborated further. When will this agreement be in place, and how are the NRAs informed of the process of this agreement?</li> <li>When finished, the rules for governance of the RSC shall be a part of the proposal pursuant to SO GL art. 77(1)(b).</li> </ul>	<p>Art. 24(4) is removed.</p> <p>see details in NROSC Explanatory Document</p>
<p>Article 25</p> <ul style="list-style-type: none"> <li>Art 25. 3, The proposal should be clarified explaining when these actions will be in place, and how often the Nordic TSO shall provide Nordic RSC with all relevant data and information to allow execution and coordination of the tasks set forth in Articles 26, 27, 28 and 29 of NROSC.</li> </ul>	<p>It is not clear to Nordic TSOs what is meant by “actions”. Operational procedures and instructions will define the scope and provision frequency of information and data to be exchanged between Nordic RSC and Nordic RSC.</p>
<p>Article 29</p> <ul style="list-style-type: none"> <li>Art 29.1, Is the reference to art 77.2.a correct?</li> </ul>	<p>Reference is removed.</p>
<p>General remarks</p> <ul style="list-style-type: none"> <li>The NRAs urge the TSOs to make sure the ROSC proposal is convergent with CSAM, as CSAM Article 15(1) allows for exclusions of XNEs when all TSOs within a CCR agree. CSAM does not mention addition of XNEs.</li> <li>The NRAs suggest the TSOs to consider delivering an explanatory document to describe in more detail how the ROSC process is handled</li> </ul>	<p>Nordic ROSC Methodology provides references to CSAM where applicable.</p> <p>Wording is amended.</p> <p>NROSC Explanatory Document has been prepared by Nordic TSOs and will be submitted to NRAs of Nordic CCR together with Nordic ROSC Methodology.</p>