

IFIEC COMMENTS ERGEG DOCUMENT OF OCTOBER 6TH ON “GUIDELINES OF GOOD PRACTICE ON GRID CONNECTION AND ACCESS”

1. It's necessary to clearly define the roles and responsibilities of different stakeholders in the scope of a future Guideline. The role of DSOs concerning the control of the grids under their supervision should be specifically stated, as they enclose generation and demand while they must follow TSOs ruling.
2. DSOs and TSOs public service obligations should not be excluded from the objectives of these Guidelines. Particularly, the right for new users to get a grid connection or an extension for existing ones, and how this right can be exercised, should be addressed with adequate detail. It must be reaffirmed that grid expansion criteria and plans should be approved by regulators and shall be available to all network users for consultation.
3. Consumers should not be identified like “loads” in the Guidelines, as they were simply a weight or a burden for the system. Quite the opposite, consumers who are the utmost goal of the power supply chain, might also actively contribute to security of supply and stabilise the electrical system in case of incidents.
4. Actually consumers may be categorised in two groups for the purpose of these guidelines: Those being able to perform actions following TSO/DSO indications in real time and those who are not. The first group is suited to react under critical circumstances that precede incidents eliminating or reducing risks for all. They may adapt or curtail their load; they may modify their ratio of active and reactive power accurately; or they may cooperate to restore the system normal operation after an incident following emergency plans. These capabilities and attitudes should be taken into consideration in the guidelines. The Guidelines should make clear that TSOs and DSOs must involve customers as much as possible when contracting ancillary services. Products should be designed to enable customers to offer their services.
5. ERGEG will find support for demand side actions in Directive 2005/89 concerning measures to safeguard security of electricity supply and infrastructure investment. Particularly in article 5.2 Members States are encouraged to adopt measures to assure the balance between generation and demand. The use of interruptible contracts, the conclusion of long term contracts between consumers and generators, or the adoption of real-time demand management technologies, are recommended among others measures.

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