bdew

Energie. Wasser. Leben.

BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.
Reinhardtstraße 32
10117 Berlin

Statement

on all TSOs‘ proposal for a generation and load data provision methodology (GLDPM-v2)

in response of ENTSO-E’s public consultation

6 April 2017

Introduction

The German Association of Energy and Water Industries (BDEW) represents over 1,800 members of the electricity, gas and water industry. In the energy sector, BDEW represents companies active in generation, trading, transmission, distribution and retail.

BDEW welcomes the opportunity to comment on ENTSO-E´s draft version of the revised proposal for a generation and load data provision methodology (GLDPM-v2), incorporating the requirements defined in two Guidelines: the Guideline on Capacity Allocation and Congestion Management (CACM Guideline) as well as the Guideline on Forward Capacity Allocation (FCA Guideline).[1]

The data procured with the help of the GLDPM will form the basis for the common grid model methodology (CGMM) which has been developed by ENTSO-E in parallel to GLDPM. Currently, both methodologies undergo changes due to the prescriptions of the above mentioned FCA Guideline. ENTSO-E also set out a consultation on the revised CGMM (CGMM-v2). BDEW will comment on the CGMM-v2 proposal in a separate document.

Taking into account that the transmission system operators (TSOs) organised within BDEW are, among others, responsible for the drafting and finalisation of the GLDPM, the BDEW Position Paper has been developed with the abstention of the German TSOs, in order not to influence the final result of the consultation.

Comments on GLDPM-v2

The GLDPM sets out requirements with respect to the delivery of the generation and load data required to establish a common grid model (CGM). The interdependencies between transmission grids cause that TSOs have to synchronise not only the operation but also the planning of their grids. Therefore, BDEW supports the idea to establish a CGM in order to enable TSOs to develop their transmission networks in accordance with the demands of the next decades. As a consequence of this, it is sensible to describe a common methodology which describes the type of data needed for a CGM and the way to procure them – it is sensible to describe a "GLDPM".

In the view of BDEW, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 17.2.b of the CACM regulation) and to prescribe that "[i]ndividual grid models shall cover all network elements of the transmission system that are used in regional operational security analysis for the concerned time-frame" (Article 19.3 of the CACM regulation).

[1] ENTSO-E: "All TSOs' proposal for a generation and load data provision methodology in accordance with Article 16 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management as well as Article 17 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation (annotated version for public consultation)", online at https://consultations.entsoe.eu/entso-e-general/gldpm-v2/

The GLDPM, however, goes beyond the prescriptions in the underlying CACM Guideline in several points. BDEW therefore asks to overhaul the respective prescriptions as described below.

GLDPM (revised draft), Article 5: Distribution and closed distribution system operators – structural data

Article 5 of the present draft GLDPM proposal states that the data to be provided by distribution system operators (DSOs) and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – which is correct – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline).

BDEW does not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information.

Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. Therefore, BDEW asks to add the following provision in the beginning of Article 5.1 of the draft GLDPM:

> ***Article 5 – Distribution and closed distribution system operators – structural data***
>
> *1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distribution system by the respective DSO shall be deemed sufficient.*
>
> *~~1.~~ 2. Distribution and closed distribution system operators shall provide the structural data described in*
>
> *paragraph 2 of this Article if these grid elements pertain to a voltage level*
>
> *a. of 220 kV or above;*
>
> *b. of less than 220 kV and they are used in regional operational security analysis.*
>
> *[....]*

GLDPM (revised draft), Article 6: Distribution and closed distribution system operators – infrequently changing variable data

For the same reasons as described above, BDEW sees need to amend the requirements with regard to the provisions of "infrequently changing variable data" laid down in Article 6 of the current draft GLDPM proposal. These data do not provide any additional accuracy. Therefore, BDEW proposes to amend the present text proposal as follows:

Article 6 – Distribution and closed distribution system operators – infrequently changing variable data

1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary.

~~1.~~ 2. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements:

a. the tap position of all modelled power transformers including phase-shifting transformers without regulation (#24)

[....]

GLDPM (revised draft), Article 7: Distribution and closed distribution system operators – variable data

Article 7 of the GLDPM proposal prescribes the types of variable data which are to be delivered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regulation reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time operation and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222."

That means there is no need for the TSO to take into account remedial actions in his own grid. Having this in mind, BDEW wonders why a TSO needs information regarding remedial actions in the *distribution* system, no matter whether it is foreseen to take them into account or not. The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accuracy provided by this information.

Apart from this, the TSO is not in the position to "ensure that those remedial actions are technically available in real time operation" if they are foreseen for the distribution system.

Therefore, BDEW proposes to amend the present text proposal as follows:

Article 7 – Distribution and closed distribution system operators –variable data

1. For the purposes described in Regulation 2015/1222, D~~d~~istribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5:

a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025);

b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 ~~and Article 14 of Regulation 2016/1719, respectively,~~ as well as topological agreed measures pursuant to the common grid model methodology (#026);

c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).

General comment

BDEW expects the long-term capacity calculation to need substantially less data than day-ahead and intraday capacity calculation. Unfortunately, the draft GLDPM proposal does not clearly mark which information is necessary for long-term and which for day-ahead calculation. This bears the risk of misunderstanding or even TSOs demanding inefficient amounts of data from grid users during national implementation.

BDEW therefore demands a clear distinction between data needed following Regulation (EU) 2016/1719 (FCA Regulation) and Regulation (EU) 2015/1222 (CACM Regulation).

As a general comment, in the view of BDEW the principles of an economical use of data and of economical information flows have to be respected in the GLDPM. Data provision requirements have to be restricted to data which are indispensable for the pursued objective and which are not provided in other ways.