

DSD concerns on Key Organisational Requirements, Roles and Responsibilities (KORRR) on data exchange

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Introduction

The KORRR methodology proposal, following the implementation of Guideline System Operation (GL SO) article 40.6¹, was submitted by all TSOs to all NRAs for approval on 14 March 2018.

The KORRR preparation process is clarified in the figure below, with the current stage of the process highlighted in green colour.



Figure 1. KORRR methodology preparation process.

The EU associations representing DSOs – CEDEC, EDSO for smart grids, eurelectric and GEODE – are convinced that the KORRR methodology proposal still contains several parts that conflict with EU legislation and risk the benefit of the system as a whole. We have requested the NRAs to consider the legal consistency and reasonability of the proposed KORRR methodology.

DSD concerns in the KORRR methodology proposal

Agreement between the TSOs and DSOs on how the future data of distribution system users are managed and exchanged.

A specific and strategically crucial part of the KORRR is legally inconsistent with the Guideline System Operation (GL SO), due to a misreading and misinterpretation of the related articles 40.7 and 40.5.

Any agreement on the KORRR should not be made by the TSOs alone, i.e. without agreement of the DSOs, on how the future data of distribution system users is managed and exchanged.

This legal inconsistency was already raised during the development phase of the KORRR but it did not result in the necessary changes.

The main point of disagreement is related to article 3.3 of the KORRR.

The EU associations representing DSOs emphasise that there is a legal right and a practical need for an **agreement** between the TSOs and DSOs regarding the decision on whether the distribution connected SGUs (Significant Grid Users) should provide data directly to the TSO and/or to the DSO, and how such data exchange is to be established. We interpret the Guideline that this right to require an agreement is written clearly in article 40.7 of the GL SO.

The same legal inconsistency (and need for an agreement) is seen in several other articles in KORRR:

- **Recital 6** – the TSO-DSO agreement should also apply to distribution connected SGUs.
- **Article 7** – TSO-DSO agreement on format of the structural data from distribution connected SGUs.
- **Articles 9 and 10** – the TSO-DSO agreement should also apply to distribution connected SGUs.
- **Article 13** – TSO-DSO agreement on provision of real-time data.

Definition of real-time data at MS level

(Article 2.5)

To avoid unnecessary and unjustified costs to stakeholders by obliging them to update data even when data has not changed in between times, and irrespective of whether the TSO actually needs it, it seems appropriate to agree at MS level between the TSO, DSO and SGUs to determine exactly what real-time means in terms of timing and updating.

Avoid double communication

(Article 3.2)

As a consequence of the proportionality and efficiency standard, double reporting of the same data to the TSO and the DSO must be excluded (cf. Recital 19 of REMIT: “should avoid double reporting”). The KORRR proposal does not contain any stipulation to translate the above-mentioned proportionality and efficiency standard. Even if in the former version of KORRR the sentence “as far as reasonably possible, SGUs shall not be required to provide the same data directly to both the TSO and the DSO it is connected to.” was used, it is not apparent under which circumstances an exchange of data between TSOs and DSOs would not be “reasonably possible”, since TSOs and DSOs are obliged to ensure a data exchange between them according to Article 51 of SO GL, and therefore a double reporting of the same would not be needed.

Leave quality and granularity of the data to MS level

(Article 3.3)

It is unclear why and how the quality and granularity of data provided to the TSO via the DSO shall be 'maintained or even improved' by the DSO. When assuming a cascaded data exchange (agreed at national level), the highest efficiency is realised by data aggregation and thus refinement. In such a scenario, DSOs will collect a wide array of data with the necessary granularity to fulfil DSOs' tasks and duties. This data will then be aggregated and provided to the TSO ensuring the quality and granularity the TSO requires. Such solutions should not be prohibited. KORRR should not exclude ex ante efficient solutions to be found at national level when implementing SO GL.

Need for DSOs to access data and their review

(Article 5.3 and Article 8.1)

DSOs should have access to the structural, scheduled and real-time information of the commissioned network elements of the transmission network at their connection point. No additional restrictions or justifications should be foreseen for providing this data to the DSOs in KORRR, since the SO GL (article 40.10) does not allow for such restrictions.

The same applies to the updates of the relevant data, especially structural data.

DSOs are system operators and should be treated as such. According to Article 40(10) of Regulation 2017/1485, "DSOs with a connection point to a transmission system shall be entitled to receive the relevant structural, scheduled and real-time information from the relevant TSOs." This entitlement encompasses updates, as information can only be relevant if it is up to date.

Do not extend the scope of the SO GL by KORRR

(Article 11.1 and Article 12)

KORRR should not extend the scope of the SO GL, not all distribution connected PGMs (Power Generating Modules) and demand facilities need be considered for the structural information, but only the SGUs as mentioned in the SO GL (article 43).

There is no requirement in SO GL (Articles 43-44) for scheduled data to be included in KORRR. Outages should not be considered as data, they are exhaustively managed in Articles 96 to 100 of SO GL, hence ensuring legal certainty, so there is no need for any additional data exchange under Title II of SO GL and KORRR.

Advance notice of any planned changes by SGUs

(Article 11.1 and 15.1)

Any advance notice, by six months, of any planned change of structural data of SGUs will be a challenge. The only way a DSO can achieve this is to force SGUs to wait for new connections or other changes, meaning holding up the connection process for long enough so that the DSO can give the necessary notice to the TSO.

Some of the generators designated as significant related to SO GL are much faster built and connected to distribution systems than 6 months.

Timings for providing updates on structural data should be decided at national level.

Real-time data from existing SGUs

(Article 17)

If TSOs need to involve existing SGUs, the effort for this involvement, should be on the TSOs, not on the SGUs. SO GL does not require SGUs to do this.
