REQUEST FOR AMENDMENT (RfA) BY THE CRU OF THE

All TSOs' proposal for the Key Organisational Requirements, Roles and Responsibilities (KORRR) relating to Data Exchange

(Article 40(6) of the System Operation Guideline)
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1 Introduction

1.1. Commission for Regulation of Utilities

The Commission for Regulation of Utilities (CRU) is Ireland’s independent energy and water regulator. The CRU’s mission is to regulate water, energy and energy safety in the public interest. Further information on the CRU’s role and relevant legislation can be found in here.

2 Background of proposal and legal context

This document provides detail on the decision of the Commission for Utility Regulation (CRU), on the all TSOs’ proposal for the Key Organizational Requirements, Roles and Responsibilities in relation to data exchange (KORRR), in accordance with Article 40(6) of the Commission Regulation (EU) 2017/1485 of 2nd August 2017 establishing a guideline on electricity transmission system operation (System Operation Guideline or SOGL).

The proposal was submitted on 12th March 2018 by the Irish Transmission System Operator (TSO) EirGrid, in line with Article 5(1) and Article 6(2) (a) of the SOGL and shall be subject to all National Regulatory Authorities (NRAs) approval, in line with Article 6(2).

As per article 40(6) of the SOGL, all TSOs shall jointly agree on key organisational requirements, roles and responsibilities (KORRR) in relation to data exchange. Those organisational requirements, roles and responsibilities shall take into account and complement where necessary the operational conditions of the generation and load data methodology developed in accordance with Article 16 of Regulation (EU) 2015/1222, i.e. Capacity Allocation and Congestion Management Guideline (CACM). They shall apply to all data exchange provisions included in Title 2 of the SOGL and shall include organisational requirements, roles and responsibilities for the following elements:

(a) Obligations for TSOs to communicate without delay to all neighbouring TSOs any changes in the protection settings, thermal limits and technical capacities at the interconnectors between their control areas;

(b) Obligations for DSOs directly connected to the transmission system to inform the TSOs they are connected to, within the agreed timescales, of any changes in the data and information pursuant to this Title;

(c) Obligations for the adjacent DSOs and/or between the downstream DSO and upstream DSO to inform each other within agreed timescales of any changes in the data and information pursuant to this Title;
(d) Obligations for SGUs to inform their TSO or DSO, within agreed timescales, about any relevant changes in the data and information established pursuant to this Title;

(e) Detailed contents of the data and information established pursuant to this Title, including main principles, type of data, communication means, format and standards to be applied, timing and responsibilities;

(f) The time stamping and frequency of delivery of the data and information to be provided by DSOs and SGUs, to be used by TSOs in the different timescales. The frequency of information exchanges for real-time data, scheduled data and update of structural data shall be defined; and

(g) The format for the reporting of the data and information established pursuant to this Title. The organisational requirements, roles and responsibilities shall be published by ENTSO for Electricity.

3 All TSOs (or ENTSO-E) proposal

3.1 Consultation phase

All TSOs (or ENTSOE) conducted a public consultation on their proposed Key Organizational Requirements, Roles and Responsibilities from 31 October 2017 to 1 December 2017 in order to fulfil the requirements from article 11 of the SOGL and to invite feedback from stakeholders on the proposal.

3.2 Proposal by all TSOs

The Key Organizational Requirements, Roles and Responsibilities (KORRR) proposal1 as submitted on 12th March by EirGrid, constitutes the all TSOs’ common proposal and outlines roles and responsibilities of the TSOs, DSOs (Distribution System Operators), SGUs (Significant Grid Users), CDSOs (Closed Distribution System Operators) in relation to data exchange.

3.3 Request for an Amendment

1 The ENTSO-E (All TSO) KORRR proposal can be found here.
The concerns raised by stakeholders during the public consultation were considered, as part of a thorough regulatory review, which resulted in NRA agreement at ACER Task Force level to draft a Request for Amendment (RfA) of the all TSOs proposal.

The RfA as drafted by all NRAs has been endorsed by the Energy Regulator’s Forum (ERF) on July 24th 2018. Following this endorsement, each NRA shall issue its decision to request amendments to the KORRR proposal to its relevant TSO(S). This paper constitutes the CRU decision to request amendments to the KORRR- the common request for amendment paper accompanies this decision paper.

4 CRU Regulatory Authority position and RfA

The CRU agrees with the all NRA decision to request amendments to the KORRR and hereby requests EirGrid to amend the KORRR in line with the amendments outlined in the All NRA RfA document accompanying this decision paper. NRAs are obliged to issue their decision to request an amendment by the 15th August 2018.

5 Next Steps

All TSOs must submit the amended proposal to their relevant NRAs within two months after publication of this decision. Following receipt of the amended proposal, the NRAs shall issue a decision within two months.

If you have any queries regarding the information contained within this paper, please contact mcloonan@cru.ie