APPROVAL BY ALL REGULATORY AUTHORITIES AGREED AT THE ENERGY REGULATORS' FORUM

ON

THE ALL TSOS' PROPOSAL FOR A COMMON GRID MODEL METHODOLOGY (CGMM) IN ACCORDANCE WITH ARTICLE 67(1) AND ARTICLE 70 OF COMMISSION REGULATION (EU) 2017/1485 ESTABLISHING A GUIDELINE ON ELECTRICITY TRANSMISSION SYSTEM OPERATION

11 JUNE 2018

I. Introduction and legal context

This document elaborates an agreement of All Regulatory Authorities, reached at the Energy Regulators' Forum on 11 June 2018, on the All-TSO proposal for the Common Grid Model Methodology (CGMM proposal), submitted in accordance with Article 67(1) and Article 70 of Regulation 2017/1485 of the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation.

This agreement of All Regulatory Authorities shall provide evidence that a decision on the CGMM proposal does not need to be adopted by ACER pursuant to Article 6(8) of Regulation 2017/1485. This agreement is intended to constitute the basis on which All Regulatory Authorities will each subsequently adopt a decision to the CGMM proposal pursuant to Article 6(2) of Regulation 2017/1485.

The legal provisions relevant to the submission and approval of the CGMM Proposal can be found in Article 4 and Articles 64 to 71 of Regulation 2017/1485.

Article 6(6) of Regulation 2017/1485 specifies that the proposal shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation.

Article 64 of Regulation 2017/1485 gives general provisions regarding individual and common grid models.

Articles 65 to 68 of Regulation 2017/1485 define the requirements to build the year-ahead CGM.

In particular, Article 65 specifies that:

- 1. All TSOs shall jointly develop a common list of year-ahead scenarios [...]
- 2. [...]
- 3. Where TSOs do not succeed in establishing the common list of scenarios referred to in paragraph 1, they shall use the following default scenarios [...]
- 4. ENTSO for Electricity shall publish every year, by 15 July, the common list of scenarios established for the following year, including the description of those scenarios and the period during which these scenarios are to be used."

Article 66(1) of Regulation 2017/1485 specifies that "each TSO shall determine a year-ahead individual grid model for each of the scenarios developed pursuant to Article 65 [...]"

Article 67(1) of Regulation 2017/1485 specifies:

1. [...] The methodology shall take into account, and complement where necessary, the operational conditions of the common grid model methodology developed in accordance with Article 17 of Regulation (EU) 2015/1222 and Article 18 of Regulation (EU) 2016/1719, as regards the following elements:

(a) deadlines for gathering the year-ahead individual grid models, for merging them into a common grid model and for saving the individual and common grid models;
(b) quality control of the individual and common grid models to be implemented in order to ensure their completeness and consistency; and

(c) correction and improvement of individual and common grid models, implementing at least the quality controls referred to in point (b).

In addition, **Article 69** of Regulation 2017/1485 defines the conditions in which week-ahead individual and common grid models can be necessary.

Article 70 of Regulation 2017/1485 specifies the elements that shall be take into account to build the day-ahead and intra-day CGM:

- 1. [...]That methodology shall take into account, and complement where necessary, the operational conditions of the common grid model methodology developed in accordance with Article 17 of Regulation (EU) 2015/1222, as regards the following elements:
 - (a) definition of timestamps;

(b) deadlines for gathering the individual grid models, for merging them into a common grid model and for saving individual and common grid models. The deadlines shall be compatible with the regional processes established for preparing and activating remedial actions;

(c) quality control of individual grid models and the common grid model to be implemented to ensure their completeness and consistency;

(d) correction and improvement of individual and common grid models, implementing at least the quality controls referred to in point (c); and

(e) handling additional information related to operational arrangements, such as protection setpoints or system protection schemes, single line diagrams and configuration of substations in order to manage operational security."

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- 4. All remedial actions already decided shall be included in the day-ahead and intraday individual grid models and shall be clearly distinguishable from the injections and withdrawals established in accordance with Article 40(4) and the network topology without remedial actions applied.

Finally, **Article 71** of Regulation 2017/1485 gives the requirements regarding the quality control applicable to all time-frames.

II. The CGMM proposal history

The draft CGMM proposal was consulted on by All TSOs, through ENTSO-E, for one month, from 6 November 2017 to 6 December 2017, in line with Article 11 of Regulation 2017/1485.¹

The final version of the All-TSOs CGMM proposal, dated 12 February 2018, was received by the last Regulatory Authority on 21 March 2018, together with a separate document providing a clear and robust justification for including or not the views resulting from the consultation. The proposal includes a proposed timescale for its implementation and a description of its expected impact on the objectives of Regulation 2017/1485, in line with Article 6(6) of Regulation 2017/1485.

Article 6(7) of Regulation 2017/1485 requires All Regulatory Authorities to consult and closely cooperate and coordinate with each other in order to reach agreement, and make decisions within six months following the receipt of submissions by the last Regulatory Authority concerned. A decision is therefore required by each Regulatory Authority by 21 September 2018.

III. All Regulatory Authorities' position

According to Regulation 2017/1485, the CGMM proposal shall take into account, and complement where necessary, the operational conditions of the Common Grid Model Methodology developed in accordance with Article 17 of Regulation (EU) 2015/1222 and Article 18 of Regulation (EU) 2016/1719.

¹ The public consultation held 6 November to 6 December 2017 is available on the ENTSO-E website: <u>https://consultations.entsoe.eu/system-operations/cgmm-v3/</u>

In accordance with Article 67(1) and 70, the methodology shall also contain, in particular:

- 1. The deadlines for gathering the individual grid models, for merging them into a common grid model and for saving individual and common grid models in accordance with;
- 2. A quality control of individual grid models and the common grid model to be implemented to ensure their completeness and consistency;
- 3. Correction and improvement of individual and common grid models.

All Regulatory Authorities consider that the proposal methodology generally meets the provisions of Regulation 2017/1485 even though some points could be improved. Indeed, Regulatory Authorities identified two points:

- Quality control: Articles 67(1)b, 70(1)c and 71 of Regulation 2017/1485 specifies that the methodology should include provisions for quality control of individual grid models and the common grid model whereas Article 23 of the CGMM proposal refers to quality criteria to be defined later by the TSOs. Regulatory Authorities think that the CGMM proposal should define these criteria.
- 2) Network elements: Article 5(1) specifies the data to be included in individual grid models and require all TSOs to include all network elements above 220 KV but adding additional network elements below 220 kV it is left to the discretion of each TSO. Regulatory Authorities consider that TSOs might not add some network elements below 220kV (intentionally or not) which could have an impact on cross border flows and estimate that transparency could be improved on this aspect.

In addition, Regulatory Authorities note that this proposed methodology takes into account, and complements, the methodologies developed in accordance with Article 17 of Regulation (EU) 2015/1222 and Article 18 of Regulation (EU) 2016/1719, but that certain inconsistencies between the different versions remain.

Therefore, Regulatory Authorities consider that the three common grid model methodologies, once approved, could be amended in order to have only one consolidated methodology that will meet the provisions of the three Regulations. Regulatory Authorities have consulted TSOs, which agree that there is benefit in merging these methodologies. These requests for amendments to obtain a consolidated CGMM can be done by TSOs or Regulatory Authorities in accordance with Article 9(13) of Regulation 2015/1222, Article 4(12) of Regulation 2016/1719 and Article 7(4) of Regulation 2015/1485 and could also be an opportunity to add the points for improvement listed above.

IV. Actions / conclusion

All Regulatory Authorities have assessed, consulted and closely cooperated and coordinated to reach agreement that the CGMM proposal meets the requirements of the Regulation 2017/1485 and as such can be approved by All Regulatory Authorities.

All Regulatory Authorities must therefore make their decisions, on the basis of this agreement, by 21 September 2018. The CGMM proposal should therefore be adopted by 21 September 2018.

Following national decisions by All Regulatory Authorities, All TSOs will be required to publish the CGMM proposal as approved on the internet in line with Article 8 of Regulation 2017/1485, and must meet the implementation deadlines required by Article 24 of the CGMM proposal.