

Comments on EU Network Code Emergency and Restoration 25 March 2015 version

Art	Comment	Remedy
2.5	Demand – it will not always be possible to compute Demand in real time. The definition must allow for some estimation of demand, particularly by DSOs.	
2.5	This is legal text, so including some partial algebra, ie “(load-generation)” needs to be written in English so there is no possible confusion.	..means the net Active Power at a given point in the system, ie is the quantity of customers’ demand minus the generation effective at that point in the system, generally expressed...
6.4	This is drawn very wide. What does it actually mean? To the extent to constraints are legal or contractual, of course TSOs and DSOs will respect them. What value does this add?	Remove
9.4	It is not clear what “section 2” is referring to. Art 9.2? But it does not seem to be make sense if this is the case.	
9.5.a	The TSO should also define the conditions necessary for creating the System Protection Schemes under 9.4.a. Where these schemes do not exist there needs to be a CBA to create these schemes.	
14.4	It is not clear what the row “Implementation Range” means. For example, if in the first stage (in GB) we aim to disconnect 5%, yet we are allowed $\pm 10\%$ , then we can disconnect nothing yet remain compliant.	Explain better what this means, or remove it.
14.4	The minimum number of steps and the maximum % of demand each step do not permit the maximum %ge disconnection of 50% to be reached.	Increase the number of steps or increase the maximum %ge per step to 12.5%
17	It must be made clear that the introduction of any LVDD scheme must have NRA approval. It is not possible to understand the justification requirement as reference is made to the DCC, which we’ve not seen for over a year.	
39.1	This drafting is opaque. What is actually required? A redundant voice comms facility, ie two independent facilities, one of which is 24 hour resilient? So would relying on (a) the public comms service count as one facility and (b) an industry provided 24 hour resilient facility meet the requirements of this article? Because if it means anything more onerous than this, it needs a CBA.	

39.2	<p>A redundant comms route to Type A and B generators is a huge imposition. Where is the CBA to make it redundant? And what is the point? The biggest risk is resilience over time. Two routes with a common mode failure is a waste of money. Need to be clear about what is actually required here.</p>	
------	---	--