
**All Continental Europe TSOs' proposal for the definition of a minimum
activation time period required for FCR providing units or groups with
limited energy reservoirs to remain available during alert state in
accordance with Article 156(11) of the Commission Regulation (EU)
2017/1485**

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All Continental Europe TSOs, taking into account the following,

Whereas

- (1) This document is a common proposal (hereinafter referred to as “Proposal”) jointly developed by all Transmission System Operators of the Continental Europe synchronous area (hereinafter referred to as the “TSOs”) to determine a time period (hereafter referred to as “Time Period”) required for frequency containment reserve providing units or groups with limited energy reservoirs (hereinafter referred to as “LER”) to remain available during alert state, in accordance with Article 156(11) of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter referred to as “SO Regulation”).
- (2) The Proposal is made taking into account the general principles and objectives set in the SO Regulation as well as Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) (hereinafter referred to as “Electricity Regulation”). The objectives of the SO Regulation are safeguarding operational security, frequency quality and the efficient use of the interconnected system and resources. It sets for this purpose requirements to FCR providers ensuring that their FCR providing units or groups with limited energy reservoirs are able to fully activate FCR continuously in alert state for a minimum time period to be defined pursuant to Article 156 (10) and (11) of the SO Regulation.
- (3) Article 156(9) of the SO Regulation provides that, in case no minimum activation period has been determined pursuant to Article 156 (10) and (11) of the SO Regulation, each FCR provider shall ensure that its FCR providing units or groups with limited energy reservoirs are able to fully activate FCR continuously for at least 15 minutes or, in case of frequency deviations that are smaller than a frequency deviation requiring full FCR activation, for an equivalent length of time, or for a period defined by each TSO, which shall not be greater than 30 or smaller than 15 minutes. Furthermore, it provides that, if a minimum activation period has been determined pursuant to Article 156(10) and (11) of the SO Regulation, each FCR provider shall ensure that its FCR providing units or groups with limited energy reservoirs shall be able to fully activate FCR continuously in alert state for that minimum activation period assessed.
- (4) Article 156(10) of the SO Regulation requires all Continental Europe and Nordic TSOs to develop a proposal concerning the minimum activation period to be ensured by FCR providers, and specifies that the period determined shall not be greater than 30 or smaller than 15 minutes. Such proposal shall take full account of the results of the cost-benefit analysis (hereinafter referred to as “CBA”) conducted pursuant to Article 156(11) of the SO Regulation.
- (5) Article 156(11) of the SO Regulation requires the TSOs of the Continental Europe and Nordic synchronous areas to propose assumptions and methodology for a CBA to be conducted, in order to assess the minimum activation period required for FCR providing units or groups with limited energy reservoirs to remain available during alert state.

The CBA shall take into account at least:

- (a) experiences gathered with different timeframes and shares of emerging technologies in different LFC blocks;
- (b) the impact of a defined minimum activation period on the total cost of FCR in the synchronous area;

- (c) the impact of a defined minimum activation period on system stability risks, in particular through prolonged or repeated frequency events;
- (d) the impact on system stability risks and total cost of FCR in case of increasing total volume of FCR;
- (e) the impact of technological developments on costs of availability periods for FCR from its FCR providing units or groups with limited energy reservoirs.

In performing the analyses, TSOs have also considered the following further elements:

- the full activation time of aFRR according to SO Regulation
 - the FCR additional properties for LER (defined according to Art.154(2) SO GL)
- (6) TSOs have proposed a CBA methodology in accordance with Article 156(11) of the SO Regulation. Such methodology has been approved by all National Regulatory Authorities (hereinafter “NRAs”) on 7 October 2020. TSOs have performed the CBA according to the approved methodology. The results of the CBA have been presented to all stakeholders by means of a public consultation. CE TSOs have submitted their proposal of Time Period, based on the outcome of the CBA, in December 2021. CE NRAs analysed the TSOs’ proposal and issued in December 2022 a Request for Amendment, asking a set of further analyses and a new run of the CBA methodology with updated input and assumptions. TSOs updated the input and assumptions and conducted a consultation with stakeholders, after which the TSOs carried out a new run of the approved CBA methodology.
- (7) Considering the results of the new run of the CBA with updated input data and assumptions and to give due consideration to all the comments received by stakeholders from the public consultation, TSOs have decided to perform further analyses with the purpose of defining the Time Period. The proposed Time Period is aimed at:
- (a) Ensuring the security of the system operation in all the foreseeable conditions;
 - (b) Setting a level playing field amongst FCR providers, fostering a fair competition between different technology in FCR provision.
 - (c) minimize FCR costs, even considering the fact that a large amount of LER are already installed in the CE synchronous area;
- and shall be closely coordinated with the FCR Dimensioning.
- (8) The analyses referred to in (7) have shown that:
- (a) Increasing amount of LER in the FCR provision entails a reduction of the security of the system operation;
 - (b) Given a specific amount of LER in the FCR provision, the longer their Time Period, the lower their impact to the security of the system operation;
 - (c) If all the currently prequalified LER would be awarded for the FCR provision, the minimum safety condition would not be fulfilled;
 - (d) Given a specific amount of LER in the provision, the safety conditions can be restored by increasing the FCR in the system and this increase entails higher costs for TSOs;
- (9) According to Article 153(2)(c) of the SO Regulation, TSOs have submitted to the NRAs the methodology for the probabilistic FCR dimensioning.

- (10) K-factors distribution may be impacted by the methodology for the FCR probabilistic dimensioning.
- (11) The FCR increase described in (8) represents an increase in the FCR costs to be borne by TSOs. This increase is due to the presence of LER in the FCR provision and to the fact that the contribution of LER to the system safety when facing long-lasting frequency deviation is inherently lower than the contribution provided by FCR providing units or groups FCR provider without limited energy reservoir.

SUBMIT THE FOLLOWING PROPOSAL FOR A TIME PERIOD TO ALL REGULATORY AUTHORITIES OF THE CE SYNCHRONOUS AREA:

Article 1 **Subject matter and scope**

This Proposal for a Time Period shall be considered as the common proposal of all Continental Europe TSOs in accordance with Article 156(11) of the SO Regulation.

Article 2 **Definitions and interpretation**

1. For the purposes of this Proposal, terms used in this document shall have the meaning of the definitions included in Article 3 of the SO Regulation, the Electricity Regulation, the Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU (recast), and the Regulation (EU) 543/2013.
2. In addition, and unless the context requires otherwise, the following terms shall have the meaning below:
 - a) 'LER' means 'FCR production units or groups with limited energy reservoirs';
 - b) 'Time Period', according to Article 156 (9) of SO Regulation, means 'the time for which each FCR provider shall ensure that its FCR providing units or groups with limited energy reservoirs are able to fully activate FCR continuously, as of triggering the alert state and during the alert state';
 - c) 'Methodology for the FCR Probabilistic Dimensioning' means a methodology for the FCR probabilistic dimensioning at CE level. This methodology must specifically include a dependency between the FCR dimensioning at CE synchronous area level and: the amount of LER expected to provide FCR, the Time Period for which the LER expected to provide FCR are prequalified.
3. In this Proposal, unless the context requires otherwise:
 - a) the singular indicates the plural and vice versa;
 - b) the table of contents and headings are inserted for convenience only and do not affect the interpretation of this Proposal for a Time Period; and
 - c) any reference to legislation, regulation, directive, order, instrument, code or any other enactment shall include any modification, extension or re-enactment of it then in force.

Article 3 **Time Period for LER**

1. The requirement for the minimum activation time period for LER is set to 30 minutes.
2. The 30 minutes requirement shall apply to LER whose first prequalification takes place after the end of the interim period (as defined below) or where a re-assessment of qualification according to Article 155(6)(b) or (c) SO GL is necessary after the end of the interim period.
3. LER already prequalified before the end of the interim period remains subject to the existing requirement at LFC Block level. Such LER shall also be subject to the 30 minutes requirement at the moment of their first re-assessment of qualification (as per SO GL Art.155(6)(a)) taking place after 10 years from the end of the interim period.
4. The duration of the interim period is 1 year from the approval of this proposal by the NRAs.

Article 4 **Publication and implementation of the Proposal**

Each Continental Europe TSO shall publish the approved Proposal for a Time Period without undue delay after all NRAs' approval, in accordance with Article 8 of the SO Regulation.

Article 5 **Language**

The reference language for this Proposal for a Time Period shall be English. For the avoidance of doubt, where TSOs need to translate this Proposal for a Time Period into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 8(1) of the SO Regulation and any version in another language, the relevant TSOs shall, in accordance with national legislation, provide the relevant national regulatory authorities with an updated translation of the Proposal for a Time Period.