

Statement

on all TSOs' proposal for a common grid model metho- dology (CGMM-v2)

in response to ENTSO-E's public consultation

6 April 2017

Introduction

The German Association of Energy and Water Industries (BDEW) represents over 1,800 members of the electricity, gas and water industry. In the energy sector, BDEW represents companies active in generation, trading, transmission, distribution and retail.

BDEW welcomes the opportunity to comment on ENTSO-E's draft version of the revised proposal for a common grid model methodology (CGMM-v2), incorporating the requirements defined in two Guidelines: the Guideline on Capacity Allocation and Congestion Management (CACM Guideline) as well as the Guideline on Forward Capacity Allocation (FCA Guideline).¹

The CGMM is closely linked to the "generation and load data methodology" (GLDPM) which is also based on the above mentioned guidelines and describes the data which are required by the transmission system operators (TSOs) to establish a common grid model. In parallel to the CGMM-v2 consultation, ENTSO-E also set out a consultation on the revised GLDPM (GLDPM-v2). BDEW will comment on the GLDPM-v2 proposal in a separate document.

Taking into account that the transmission system operators (TSOs) organised within BDEW are, among others, responsible for the drafting and finalisation of the CGMM, the BDEW Position Paper has been developed with the abstention of the German TSOs, in order not to influence the final result of the consultation.

Comments on CGMM-v2

The aim of the common grid model methodology is to enable the TSOs to establish a common grid model, based on the data received by distribution system operators (DSOs) as well as grid users as described in the GLDPM. The interdependencies between transmission grids cause that TSOs have to synchronise not only the operation but also the planning of their grids. Therefore, BDEW supports the idea to establish a common grid model (CGM) in order to enable TSOs to develop their transmission networks in accordance with the demands of the next decades. In the view of BDEW, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 17.2.b of the CACM regulation) and to prescribe that "[i]ndividual grid models shall cover all network elements of the *transmission* system that are used in regional operational security analysis for the concerned time-frame" (Article 19.3 of the CACM regulation; our emphasis).

However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the *high-voltage and extra high-voltage network* insofar as

¹ ENTSO-E: "All TSOs' proposal for a common grid model methodology in accordance with Article 17 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management as well as Article 18 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation (annotated version for public consultation)", online at <https://consultations.entsoe.eu/entso-e-general/cgmm-v2/>

these are used in regional operational security analysis for the concerned time-frame” (Article 5 of the draft CGMM proposal; our emphasis).

This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by the TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying CACM regulation. This is not in line with the basics of European legislation. BDEW therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is run by the TSOs.

Next to the provision in Article 5, BDEW sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From BDEW’s point of view, this provision is not based on the requirements laid down in the CACM regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which also contain distribution systems. Hence, BDEW asks for rephrasing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal.

With regard to the incoherency with the underlying CACM regulation, BDEW would very much welcome a revision of the above mentioned requirements in the CGMM proposal.