CEN – European Committee for Standardization
CENELEC – European Committee for Electrotechnical Standardization

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CEN-CENELEC response to the European Commission's Consultation on the 'Establishment of the annual priority lists for the development of network codes and guidelines for 2016 and beyond'

August 2015

Introduction

CEN and CENELEC recognise the importance of ensuring the full integration of the energy market in Europe and welcome the opportunity to comment the proposed annual priority list and to provide input on the network code development process in general and on the possible scope and need of network codes and guidelines beyond 2016.

Tentative annual priority lists 2016

Regarding the annual priorities for 2016 and beyond, indicated in the consultation, CEN and CENELEC wish to express the following comments:

- Regarding electricity network rules: the focus on finalization of already started work is seen as positive. However, CEN and CENELEC wish to express the urgent need for a standardization request (a mandate) on issues relating to the implementation of network codes in the upcoming two years even though this is has not been foreseen yet in the existing legal framework on governance structure for energy. Involving CENELEC will significantly support the implementation of network codes at EU level and at the same time entail alignment of the European and international standardization activities relating to the requirements set by the network codes.
- Regarding gas networks rules: potential interfaces were identified on the forthcoming European Standard on Quality of gas - Group H (FprEN 16726). The scope of the

network code on interoperability and data exchange is limited to transmission systems. Thus, it shall be ensured that the amendment to the network code respects the relevance of the gas quality for the whole gas chain including end use (this aspect has been noted during the drafting process of FprEN 16726 which includes A-deviations). Therefore, as proposed, the Wobbe index parameters should not be included in this amendment of the network code, respecting the need of further studies enabling a European consensus on this parameter. CEN/TC 234 is already and should continue involved in the ongoing preparatory work for the proposed amendment of the network code.

Network Code development process

CEN and CENELEC also appreciate the present opportunity to comment on different aspects linked to network codes development process. In order to contextualize the following comments, CEN and CENELEC wish to briefly remind that CEN and CENELEC aim at producing high-quality standards for products and services that incorporate quality, safety, environmental, interoperability and accessibility requirements. CEN and CENELEC are recognized by Regulation 1025/2012 on European Standardization.

European Standards are an effective self-regulation tool and provide support to European legislation. Harmonized standards are developed by industry experts to respond to essential regulatory requirements, remain voluntary and benefit from wide market acceptance.

A European Standard carries the obligation to be implemented at national level by being given the status of a national standard and by withdrawal of any conflicting national standard. Therefore, a European Standard automatically becomes a national standard in each of the 33 CEN-CENELEC member countries. Standards are voluntary which means that there is no automatic legal obligation to apply them.

CEN and CENELEC closely cooperate with their international counterparts, respectively the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC). As a result of this cooperation 30 percent of CEN publications are identical or based on ISO standards while for CENELEC portfolio in the electrotechnical field this share amounts to 77 percent.

Relation between networks codes and standardization:

Thanks to the Memorandum of Understanding signed between CEN, CENELEC and ENTSO-E, in September 2013 the framework for cooperation was set giving reciprocal rights to participate in the meetings and receive work programme of the other party. Moreover, a common workshop on the Demand Connection Code (DCC) and its impact on the issues relating to the Demand Side Response was organized with participation of ENTSO-E and other CEN and CENELEC technical committees.

However, CEN and CENELEC perceive these developments as only the first step toward the mutual compatibility of European Standards and network codes. With this paper CEN and CENELEC would like to propose to make better use of a voluntary, single standard model for the purpose of finalization and implementation of network codes for electricity.

Thanks to the Memorandum of Understanding signed between CEN, CENELEC and ENTSOG in June 2014, the cooperation between the 3 organizations started a few months ago. This demonstrates the CEN and CENELEC interest and willingness to ensure the mutual compatibility of European Standards and network codes on gas.

European Standards are an essential tool for the development of an efficient and reliable electricity distribution in Europe. Therefore, in order to further improve this recent collaboration, CEN and CENELEC are currently seeking the possibility to discuss the establishment of a more formal link between standards and network codes. **CEN and CENELEC believe that a continued and enhanced collaboration between ENTSOs (-E and –G), CEN and CENELEC would have some major advantages**, e.g.:

- **Early involvement of stakeholders in the drafting process of new network codes**: CEN and CENELEC would welcome the opportunity to be included in the 'network code information flow' as early as possible, e.g. early drafting stage. This would allow possible investigation of available European Standards or whether some standard revision would be needed. Lot of standards supporting network codes are already available or under development. Early involvement and communication exchange with standardization experts would avoid possible misunderstandings on the purpose of European Standards (and their link with network codes) at a late drafting stage.

- The standardization committees are composed of industry experts from various fields of expertise and countries. Closer link between ENTSOs (-E and –G), CEN and CENELEC would ensure the **proper exchange of information between experts**.

In addition, CEN and CENELEC take the present opportunity to formulate the following suggestions:

- **Transparency of the process**: CEN and CENELEC are wondering whether some aspects of the process could be more transparent (e.g. changes during the comitology process). Moreover, CEN and CENELEC would like to be granted the status of an observer in the comitology process for network codes for electricity.

- **Systematic process for linking the development of network codes for electricity and standards:** CEN and CENELEC propose to make use of the New Approach concept. The link between the network codes and the standardization could be made through standardization requests (mandates) to be given by the Commission

to CEN and CENELEC in line with Regulation 1025/2012 on European Standardization. Such mandates would request CEN and CENELEC to adopt specific standards e.g. for testing or measurement of new requirements of the network codes in order to complement them. The standards could also detail the requirements of the network codes or provide further details in respect to terminology or safety functions (e.g. installation, household appliances for Demand Side Response). Similar standardization requests are issued in other sectors, for example they are foreseen in the Interoperability Directive 2008/57/EC and serve as a link between Technical Specifications of Interoperability (TSI) and the European Standards in the railway sector.

- **Maintenance procedure for published network codes**: Some network codes will establish new rules and procedures for market players. Therefore, network codes adjustments and/or improvements might be needed at a later stage (i.e. technological developments, etc…), therefore CEN and CENELEC think that the development of an open and transparent network code maintenance procedure could be envisaged. As regards the electricity field, the most relevant for standardization work of the CEN and CENELEC technical committees seem to be the network codes on Requirements for Generators, Demand Connection and HVDC Connection (so called connection network codes). In particular, CEN and CENELEC should be involved in discussing technical issues covered by the network codes.

- **Implementation of network codes:** CEN and CENELEC would like to be involved at implementation process of network codes and become the member of the Stakeholder Committee on network codes developed by ENTSO-E.

- **Implementation of network codes for gas quality:** The significant impact on national gas industries, that the implementation of the European Standard on Quality of gas - Group H (FprEN 16726) might have shall be taken into account. Therefore, a reasonable transition phase, in particular for combustion properties is recommended. This will enable the stakeholders to adapt the national situation and to respect the related requirements of the amendment. CEN and CENELEC would like to emphasize the need for good coordination with ENSTOG.

About CEN and CENELEC

CEN (European Committee for Standardization) and **CENELEC (European Committee for Electrotechnical Standardization)** are recognized by the European Union (EU) and by the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing and defining standards at European level. These standards set out specifications and procedures in relation to a wide range of products and services.

The members of CEN and CENELEC are the National Standards Bodies and National Electrotechnical Committees of 33 European countries including all of the EU member states plus Iceland, Norway, Switzerland, Turkey and the former Yugoslav Republic of Macedonia.

European Standards (ENs) are developed through a process of collaboration among technical experts nominated by business and industry, research institutes, consumer and environmental organizations and other societal stakeholders. Once adopted, these standards are implemented and published in all of the 33 countries covered by CEN and CENELEC.

CEN and CENELEC also work to promote the international harmonization of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and IEC (International Electrotechnical Commission).

For more information, please see: www.cencenelec.eu