

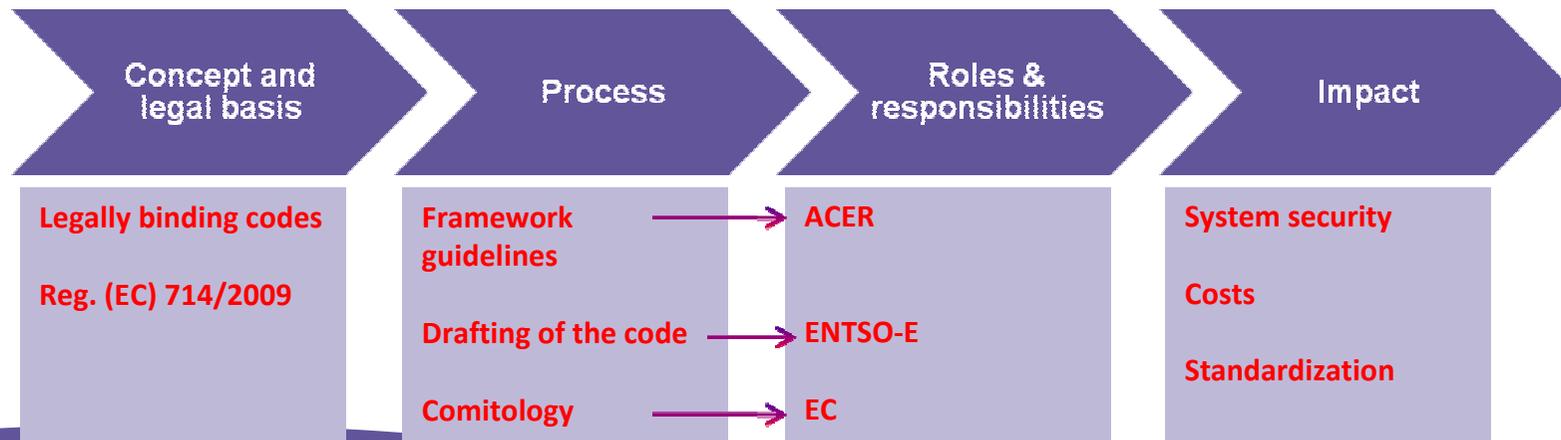
ENTSO-E Network Code Development Lessons Learnt from the “Pilot Code”

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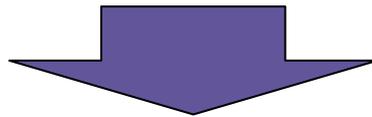
General Thoughts on Pilot Code Process

- **The chosen Pilot Code “Requirement for Generators” is an extremely complex and challenging Network Code as**
 - The technical aspects are very complex
 - High impact on market integration, generation connection and safe system operation
 - Many stakeholders with diverging interests are involved
- **The early ENTSO-E/ERGEG start was appreciated, yet stakeholders’ awareness was limited:**



Stakeholder Involvement

- **ENTSO-E recognised from the beginning of the process the importance of stakeholders involvement on an equitable basis:**
 - Bilateral meetings with most impacted stakeholders' associations
 - Two open public workshops
 - Recurrent publications of the pilot code drafts (last in March 2011)
 - Foreseen publication of detailed evaluation of stakeholders' input in Q2/2011
 - TSOs organising national discussion in existing fora
- **The ENTSO-E communication has been successful in raising awareness: many hundreds of comments received resulting in significant improvements in the code**
 - But significant diversity in stakeholders' concerns



ENTSO-E must weigh inputs and propose the most appropriate solutions

Involvement of DSOs needs further consideration

- **DSOs have a twofold role in the connection codes:**
 - **Grid operators** with regards to requirements to third party grid users
 - **Grid users** from the perspective of TSOs or upstream DSOs
- **Organization of DSO participation**
 - No single DSO association at European level
 - The associations reflect different opinions due to the different DSOs they represent (large DSOs, small municipal DSOs, ...)
 - Many DSOs are not aware of the European Network Code Development Process and the impact on their future work
- **The DSO involvement has to be organized so that the two roles are reflected accordingly**

Lessons Learnt for Developing the Network Code

- 12-month period for drafting the codes and performing an extensive consultation is **too short**.
 - Parallel work of ACER and ENTSO-E is necessary
- **Close and early cooperation of EC, ACER and ENTSO-E** is essential to achieve an efficient process.
- EC and ACER (first movers) must **raise awareness** early among stakeholders and **ensure unambiguous guidance to ENTSO-E** via the framework guidelines
- The process of **consultation has to be transparent and well-managed** both from ENTSO-E and stakeholders
 - Avoid filibustering the process
- Difficult to conciliate all conflicting interests: therefore **choices have to be made and well documented by ENTSO-E**