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Nordenergi's comments to the consultation on the Nordic TSOs' proposals for frequency quality and FCR related methodologies for the Nordic synchronous area

Nordenergi, the umbrella association of the Nordic electricity industry associations, welcomes the consultation on the Nordic TSOs' proposals for frequency quality and FCR related methodologies for the Nordic synchronous area. Nordenergi represents retailers, distributors and producers of electricity in Sweden, Denmark, Norway, Finland and Iceland.

Our comments to the consultation are given below.

Nordenergi supports that the Nordic TSOs have agreed to take steps to ensure that the time period outside the frequency range will be limited to 10 000 minutes/year, and that this will be followed up on a quarterly basis.

We have the following comments regarding the proposal for additional properties of FCR in accordance with Article 154(2) of the Commission Regulation (EU) 2017/1485 of 2 August 2017:

In the explanatory document for Nordic FCR additional properties proposal it is raised that the existing additional FCR properties do not necessarily meet the needs of the Nordic power system anymore. The TSOs foresee in the near future that changes and additions to the additional FCR properties are required and it is stated that: "Since the new requirements need to be defined carefully and in close cooperation with potential providers of FCR-N and upward FCR-D, the TSOs decided not to rush the implementation of new requirements".

Nordenergi regards that stronger efforts could have been made to address some of the issues raised by the TSOs already in the consulted proposal. We have the understanding that a separate consultation on downward FCR-D will be performed shortly and supports this effort to make the portfolio of reserves more complete.

Given both the expected changes in the Nordic power system, the TSOs quarterly monitoring of the frequency quality and possible changes in product and settlement routines, it is crucial with deeper stakeholder involvement in the process going forward. In the monitoring process, it is important that new requirements are tested during a period to study/analyse any improvement to the frequency in the Nordic synchronous area before requirements enter into force on a permanent basis.

Hence, new requirements etc. should be developed together with a reference group from the industry. We further encourage the TSOs to publish an implementation plan for the FCR in the Nordic region containing milestones like pre-qualifications, product roll-out, frequency monitoring periods and expected stakeholder involvement including future consultations.