

## 17<sup>th</sup> System Operation European Stakeholder Committee (SO ESC)

9 June 2021, 13:30-15:00

Online meeting

### Draft Minutes

Participants		
Uros	Gabrijel	ACER (Chair)
Anneli	Teelahk	EASE
Eric	Dekinderen	VGB Powertech
Pavla	Erhartova	Europex
Thomas	Hölzer	BNetzA
Mike	Kay	GEODE
Georgios	Papachristos	WindEurope
Naomi	Chevillard	SolarPower Europe
Andreas	Luxa	Orgalime
Paul	De Wit	E.DSO
Klaus	Oberhauser	VGB Powertech
Marco	Pasquadibisceglie	Arera
Andreas	Luxa	T&D Europe
Yannick	Phulpin	Eurelectric
Marc	Malbrancke	CEDEC
Gunnar	Kaestle	COGEN
Anneli	Teelahk	EASE
Vincenzo	Trovato	ACER
Lukas	Wachter	E-Control
Markus	Watscher	EURELECTRIC
Florentien	Benedict	CEDEC
Stein	Øvstebø	IFIEC
Michael	Wilch	EON
Rafal	Kuczynski	ENTSO-E/PSE
Ton	Geraerds	RWE
Ana	Cigaran Romero	ENTSO-E/50hertz
Bernard	Malfliet	ENTSO-E/Elia
Markus	Besser	ENTSO-E
Alina	Neagu	ENTSO-E
Daiga	Dege	ENTSO-E
Victor	Charbonnier	ENTSO-E

## 1. Opening

### 1.1. Review of the agenda

The Chair opens the meeting.

The agenda is confirmed with the addition of wind eclipse topic under AOB.

### **1.2. Review and approval of minutes from December meeting**

The minutes from the March meeting are approved.

VGB Powertech (Eric Dekinderen) asks that issues previously raised on NC Cybersecurity are addressed in today ESC meeting.

### **1.3. Actions**

ENTSO-E (Ana Cigaran) updates on the open actions from the last meetings.

- CBA FCR LER to be addressed as AOB in today ESC meeting
- Offshore bidding zone: ENTSO-E position paper to be published in early July.

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## **2. Update on implementation actions at pan EU level**

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ENTSO-E (Ana Cigaran) presents the updates on the implementation actions.

### CSAm amendments (Art. 21 & 27 SO GL):

After the oral hearing finalized end of April, the next step is the approval of the final document by the ACER Board of Regulators in June 2021.

### Regional proposals for CSA (Art. 76 & 77 SO GL):

All Art.76 proposals are approved by the NRAs.

### RCC establishment proposals (Art. 35 Regulation):

The approval of the RCC establishment proposals by regulators of each SOR is expected by summer 2021.

### Risk preparedness:

The Electricity Coordination Group (ECG) completed the internal process of gathering comments to the 7 September 2020 ENTSO-E "Identification of Regional Electricity Crisis Scenarios" Report. ENTSO-E will proceed to the review of the comments. The response is planned for autumn.

### KORRR:

No update

### Operational agreements:

No update

### Transparency Platform:

Update of SO GL Detailed Data Descriptions (DDD). New SO GL DDD will be included to the Manual of Procedures and subject to public consultation. At the working level, ACER provided comments that ENTSO-E took into account.

### Active Library:

Tool will be launched in summer 2021

VGB Powertech (Eric Dekinderen) asks if the outcome of the analysis on risk preparedness will be made public. ENTSO-E (Ana Cigaran Romero) explains that the analysis is only for the members of the Electricity Coordination Group.

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## **3. Cybersecurity Network Code**

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ACER (Vincenzo Trovato) provides a project update on the Framework Guidelines on Cybersecurity Network Code. On 28 January 2021, The European Commission invited ACER to start drafting such guidelines in accordance with Article 59(4) of Regulation (EU)2019/943. The guidelines should set out clear and objective principles for the development of network code. ACER has issued draft guidelines for public consultation from 30 April to 29 June 2021.

Following this, ACER has to submit non-binding framework guidelines to the European Commission and an evaluation of responses to the public consultation.

The framework guideline proposes mainly:

- Cybersecurity requirements for a wide scope of organisations
- Cross-border electricity cybersecurity risk assessment
- A system for common cybersecurity requirements and its verification
- A system for information sharing, incident- and crisis management
- Advanced requirements in form certification of essential products and exercises

Cybersecurity rules have to be in line with the system needs and take due consideration with possible cascading effects.

ACER invites members to submit any scope-related questions to DFG-NC-CS@acer.europa.eu.

CEDEC (Marc Malbrancke) asks what the rationale is for applying the delegated act route. The Chair explains that the European Commission presented this during ACER public webinar and invites the members to consult ACER webpage for the Commission slides. CEDEC is keen on receiving more information from the European Commission about this choice although the request will not be addressed in the next SO ESC as this is an ongoing development.

(COGEN) Gunnar Kaestle asks the following:

- Does the NC Cybersecurity only apply to the electrical system or other energy system?
- Is there a distinction between top level communication between system operators and communication with end-users (e.g. smart metering systems)?
- Is there a report on the event that happened in Austria about the default of SCADA systems?

ACER (Vincenzo Trovato) replies that the framework guidelines (FG) only targets the electricity sector. Regarding the second question, he invites members to consult the approach explained in the document. The Chair further explains that the legal framework is more advanced for the electricity sector than it is for the gas and oil sectors. He also explains that an event related to SCADA systems, if coming from a TSO, would have to be included in the Incident Classification Scale (ICS) report. However, such events at a DSO level are not reported via the ICS.

ENTSO-E (Alina Deagu and Daiga Dege) explains the steps prior to the formal process i.e. delivery of a Final interim Report to European Commission. The formal drafting process will start by 27 July 2021 once the public consultation on the FG is closed and the European DSO Entity governing bodies are established. It is highlighted that the NC will be the first ever set of rules strengthening the electricity sector resilience against cyber threats. The cooperation also involves experts from the ENISA.

The Chair asks if ENTSO-E will organise a webinar and public consultation during the drafting process. ENTSO-E explains that there is a 4 weeks period allocated for public consultation likely to start in October. The date will be communicated as soon as possible. The Chair recommends that the European Commission attends the webinar as it was the case for ACER consultation on the FG and provides any required explanations including on why the approach is different than usual (cf. delegated acts).

VGB Powertech (Eric Dekinderen) asks if the communication between marketplaces is in the scope and if NEMOs are involved in the drafting process. ENTSO-E (Alina Deagu) explains that NEMOs are included in the scope.

CEDEC (Marc Malbrancke) asks the rationale for the drafting process to last only 5 months ENTSO-E (Alina Deagu) explains that there was no justification provided and the initial timeline was even more challenging.

Eurelectric (Yannick Phulpin) asks how the stakeholders, notably market parties, will be involved in the drafting process. ENTSO-E (Alina Deagu) explains that working relations are established with NEMOs while the contact with market parties and grid users is foreseen for the public consultation. Eurelectric recommends that the scope of stakeholders' involvement is widened. ENTSO-E (Alina Deagu) proposes that a dedicated workshop is organised with relevant stakeholders to collect feedback and possibly integrate it before the public consultation. (T&D Europe) Andreas Luxa explains that TSOs already implement cybersecurity requirements in control rooms. He also mentions that the TFSG EG2 can be the place to facilitate further stakeholders engagement. VGB Powertech (Eric Dekinderen) asks if generators and OEM are also involved. CEDEC (Marc Malbrancke) reminds that the new process for NC development implies the creation of a drafting committee is foreseen and that it will involve relevant stakeholders. (COGEN) Gunnar Kaestle highlights CENELEC TC8X as possible list of relevant stakeholders. The Chair reiterates that a drafting committee will have to be established as per the Regulation.

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#### **4. CGM Implementation Programme**

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ENTSO-E (Markus Besser) presents an update on the CGM programme which is now focusing on operational preparation of TSOs in view of the go-live in the end of the year. He explains the timeline of key activities:

- Infrastructure delivery
- Operational Planning Data Environment delivery
- Business operational readiness
- Service operation design and implementation
- Minimum viable solution security compliance: security audits are taking place

He further highlights potential risk regarding physical communication network and MVS security compliance. Some TSOs might not comply with the foreseen controls by the end of the year. Mitigation measures are being developed in this view involving other communication means provided there is an acceptable level of compliance.

Eurelectric (Yannick Phulpin) asks when the CGM will be used in RCC processes. Markus takes note and an update will be provided in the next SO ESC.

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#### **5. AoB**

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ENTSO-E (Luca Ortolano) updates on the topic of Large Energy Reservoirs providing Frequency Containment Reserves. The timeline foreseen ends in October 2021. ENTSO-E is addressing stakeholders comment in the development of the proposal while taking into account the diversity of FCR procurement scheme across Europe. ENTSO-E will consider not only the minimum activation time period but also the method for FCR dimensioning. He then presents the next steps: 1) public consultation (date is to be confirmed), 2) workshop with stakeholders in September, 3) submission of the proposal to NRAs in October.

(EASE) Anneli Teelahk asks about the timing of the public consultation and raises concerns about the level of participation if it takes place in August during the holiday period. ENTSO-E (Luca Ortolano) explains that a decision still needs to be taken on the timing but ENTSO-E is considering extending the consultation period to 5 weeks such that it either starts by the end of July or ends in early September.

(COGEN) Gunnar Kaestle raises concern that the wind eclipse phenomena is not properly addressed in the SO ESC whereas the problem will gain importance. He further asks for clarification on which group is relevant to tackle the problem. Arera (Marco Pasquadibisceglie) agrees the topic should be addressed, and NRAs are taking it seriously.

The Chair invites ENTSO-E to report on its findings concerning this point at the next SO ESC. The report should also include mitigation measures especially those that are identified in the different Member States. If need be for different layers of mitigation actions, the report could be disseminated to Member States, market experts etc. to make sure the issue is addressed.

The next meeting of the SO ESC will be on 23 September.

- ➔ Action: ENTSO-E will propose an action plan on how to organise the discussion on the wind eclipse in the next SO ESC meeting.
- ➔ Action: ENTSO-E will provide further details on the list of mitigation measures for deterministic frequency deviations by end of June.