**COMMENTS AND REMARKS FOR THE BALTIC REGION lfc RESERVE PREQUALIFICATION REQUIREMENT ARTICLE 3 AMENDMENT PROJECT**

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| **Market participant** | **Question/comment form the market participants/NRAs** | **Baltic TSO‘s comment** |
| VERT - Lithuanian NRA | The explanatory note does not explain the purpose of the proposed additions. In view of this, the National Energy Regulatory Council (VERT) requests an explanation of the circumstances that led to the need for the proposed changes. | **The following explanation is provided**: This change creates opportunities to provide services to a larger number of service providers.  In this case, service providers whose equipment was put into use before the network connection codes came into force would not be discriminated against. |
| VERT - Lithuanian NRA | The project proposes to add Section 3 with a provision stipulating that “ If the equipment was commissioned before the date of entry into force of RfG and DCC, LFC reserve providing units shall comply with the national requirements at the time of commissioning.**.”**  The proposed formulation creates uncertainty as to when equipment put into operation before the European Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators, and the European Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a network code on demand connection requirements, national requirements apply, since the Baltic Sea Region LFC Reserve Prequalification Principles do not define the term “start of operation.”  Taking this into account, VERT proposes to clarify the above wording by specifying a clear term for its application or to supplement the Baltic Sea Region LFC Reserve Prequalification Principles with a definition of “start of operation of the unit providing LFC reserve.” | **Remark is partially evaluated. Explanation is provided:**  The original version uses the expression “**at the time of commissioning**”.  In the light of the observation received, in accordance with the English version of Article 4 (2(a)) of the Commission Regulation (EU) 2016/631 of 14 April 2016 on the network code laying down the requirements for connection of generators to the electricity grid (hereinafter referred to as “RfG”), we formulate the requirement in the following language:  "All LFC Reserve Units which are considered existing in accordance with RfG and DCC shall comply with national requirements **at the time of connection**.  All other LFC Reserve Units shall comply with the requirements set in this paragraph."  This formulation avoids ambiguity as the term "existing power-generating modules" is clearly defined in RfG and is tied to the extent of applicability to RfG and DCC. |
| VERT - Lithuanian NRA | It is proposed to further specify: **„Including but not limited to that specified in Table 1, units providing LFC reserve must meet the requirement to operate indefinitely in the frequency range 49,0-51,0 Hz.“** The requirement to operate indefinitely applies to production units. It should be noted that demandunits can also provide LFC reserve, so it is believed that the requirement is not correct in relation to such units. | **The remark is not evaluated.**  These requirements aim to create equal and non-discriminatory conditions for all market participants providing services, including demand facilities.  Newly connected demand facilities must comply with the requirements for demand connection established by the Commission Regulation (EU) 2016/1388 of 17 August 2024. |
| Anonymous | Related document includes required signals and testing procedure. On the other hand, it is highly recommended to give required specifications explicitly. For example: A conclusion from testing method (Chapter 5, section “5.5.3 Testing Method”) suggests that regardless of the active power magnitude change triggered by frequency changes, it is expected that the Park Controller provides a response within 5 minutes. This observation implicitly suggests that the Park Controller needs to operate with a dynamic ramp-rates to implement the active power response, but technical requirements do not mention about this requirement explicitly. To include full and comprehensive list of requirements in the document would set clear set of rules for all parties which prevents any misalignments. | **The remark is not evaluated.**  The consultation was conducted only for the amendment of Chapter 3. Detailed requirements are established in the connection conditions and/or connection network codes set by the operator. |
| Anonymous | It is highly recommended to add description of how FCR; aFRR, mFRR is required to interact with other controller mechanisms such as ´Active Power Control` and ´Frequency Control (LFSM/FSM)  This will point out clear description of requirements for all relevant parties. | **The remark is not evaluated.**  The consultation was conducted only for the amendment of Chapter 3. Detailed requirements are established in the connection conditions and/or connection network codes set by the operator. |
| Eesti Energia AS | First, it is unclear whether “this paragraph” refers to Article 3 in this document or something else.  Second, based on the previous public consultation of the same matter ([https://www.elering.ee/loppenud-konsultatsioonid?page=2#accordion2053](https://www.elering.ee/loppenud-konsultatsioonid?page=2" \l "accordion2053)) and on the received clarifications by Elering thereafter, we understood that the principle of following the national requirements at the time of commissioning for the assets that were commissioned before the date of entry into force of RfG is generally being adhered to during the prequalification tests. That means, not just the requirements given in Article/paragraph 3 but also the rest of the document, e.g. the start of activation of FCR reserves etc. Therefore, given the lack of balancing reserves in the Baltic states, we propose to rephrase the paragraph so that for the assets that were commissioned before the date of entry into force of RfG, each TSO has the right to decide, whether to qualify the assets based on the national requirements at the time of commissioning these assets or require adhering to the requirements set in this document. *(This is more general wording and refers to all the requirements not just Article 3/”this paragraph”).* | **The remark is not evaluated.**  The version of the proposed amendment specifies the application of the requirements before/after the entry into force of the connection codes. An additional provision granting the operator the right to decide on the applicability of the requirements is unnecessary.  **An explanation is provided.**  The requirements apply to Article 3 of this document. |
| R8 Energy OÜ | Does this article apply only to RPUs and not to RPGs (according to the definition, RPG does not need to consist of RPUs)? | The Article applies to Reserve Units which may be single Reserve Providing Units or Reserve Providing Group. For the RPG-s the requirements apply based on the connection agreement and type of the power module. |
| R8 Energy OÜ | The meaning of “unlimited operation” is not clear. The time of operation is product-specific, isn’t it? | In accordance to RfG Chapter 1 Articles it is required that power generating modules need to be capable of operating unlimited time period when the frequency is in the range of 49.0 Hz to 51,0 Hz. This requirement is not referring to any service Reserve Unit is providing. |