



**Agreement by All Regulatory Authorities in the Nordic
Synchronous area**

on

**Nordic synchronous area proposal for minimum activation
period to be ensured by FCR providers in accordance with
Article 156(10) of the Commission Regulation (EU)
2017/1485 of 2 August 2017 establishing a guideline on
electricity transmission system operation**

17 September 2021

I. Introduction and legal context

This document elaborates an agreement of all Regulatory Authorities in the Nordic synchronous area (hereinafter referred to as NRAs). An agreement was made on September 17, 2021, on the Nordic TSOs (hereinafter referred to as TSOs) “Nordic synchronous area proposal for the minimum activation period to be ensured by FCR providers in accordance with Article 156(10) of the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing guideline on electricity transmission system operation” dated 14 April 2021 (hereinafter referred to as respectively “minimum activation time to be ensured by FCR providers proposal” and “Regulation 2017/1485”).

This agreement of the NRAs shall provide evidence that a decision on the minimum activation time to be ensured by FCR providers proposal does not need to be adopted by European Union Agency of the Cooperation of Energy (ACER) pursuant to Article 6(8) of the Regulation 2017/1485 at this stage. This document is intended to constitute the basis on which all NRAs will each subsequently make national decisions pursuant to Regulation 2017/1485 Article 6(1) to approve the minimum activation time to be ensured by FCR providers proposal from the TSOs. The TSOs are Fingrid Oyj, Svenska kraftnät, Energinet, Kraftnät Åland AB and Statnett SF.

The legal provisions relevant to the submission and approval of the minimum activation time to be ensured by FCR providers proposal, and this all NRAs agreed opinion, are Articles 4(1), 5(1), 6(3)(d)(v), 6(6), 6(7), 11, 118(1)(r), 156(9) and 156(10) of Regulation 2017/1485, listed below.

Article 4(1)

This Regulation aims at:

- a) determining common operational security requirements and principles;
- b) determining common interconnected system operational planning principles;
- c) determining common load-frequency control processes and control structures;
- d) ensuring the conditions for maintaining operational security throughout the Union;
- e) ensuring the conditions for maintaining a frequency quality level of all synchronous areas throughout the Union;
- f) promoting the coordination of system operation and operational planning;
- g) ensuring and enhancing the transparency and reliability of information on transmission system operation;
- h) contributing to the efficient operation and development of the electricity transmission system and electricity sector in the Union.

Article 5(1)

TSOs shall develop the terms and conditions or methodologies required by this Regulation and submit them for approval to the competent regulatory authorities in accordance with Article 6(2) and (3) or for approval to the entity designated by the Member State in accordance with Article 6(4) within the respective deadlines set out in this Regulation.

Article 6(3)(d)(v)

The proposals for the following terms and conditions or methodologies shall be subject to approval by all regulatory authorities of the concerned region, on which a Member State may provide an opinion to the concerned regulatory authority:

methodologies, conditions and values included in the synchronous area operational agreements in Article 118 concerning:

for the CE and Nordic synchronous areas, the minimum activation period to be ensured by FCR providers in accordance with Article 156(10);

Article 6(6)

The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation. Proposals on terms and conditions or methodologies subject to the approval by several or all regulatory authorities shall be submitted to the Agency at the same time that they are submitted to regulatory authorities. Upon request by the competent regulatory authorities, the Agency shall issue an opinion within 3 months on the proposals for terms and conditions or methodologies.

Article 6(7)

Where the approval of the terms and conditions or methodologies requires a decision by more than one regulatory authority, the competent regulatory authorities shall consult and closely cooperate and coordinate with each other in order to reach an agreement. Where the Agency issues an opinion, the competent regulatory authorities shall take that opinion into account. Regulatory authorities shall take decisions concerning the submitted terms and conditions or methodologies in accordance with paragraphs (2) and (3), within 6 months following the receipt of the terms and conditions or methodologies by the regulatory authority or, where applicable, by the last regulatory authority concerned.

Article 11

- 1 TSOs responsible for submitting proposals for terms and conditions or methodologies or their amendments in accordance with this Regulation shall consult stakeholders, including the relevant authorities of each Member State, on the draft proposals for terms and conditions or methodologies listed in Article 6(2) and (3). The consultation shall last for a period of not less than 1 month.
- 2 The proposals for terms and conditions or methodologies submitted by the TSOs at Union level shall be published and submitted to public consultation at Union level. Proposals submitted by the TSOs at regional level shall be submitted to public consultation at least at regional level. Parties submitting proposals at bilateral or at multilateral level shall carry out a public consultation at least in the Member States concerned.
- 3 The TSOs responsible for developing the proposal for terms and conditions or methodologies shall duly take into account the views of stakeholders resulting from the consultations prior to its submission for regulatory approval. In all cases, a sound justification for including or not including the views resulting from the consultation shall be provided together with the submission of the proposal and published in a timely manner before, or simultaneously with the publication of the proposal for terms and conditions or methodologies.

Article 118(1)(r)

By 12 months after entry into force of this Regulation, all TSOs of each synchronous area shall jointly develop common proposals for:
for the CE and Nordic synchronous areas, the minimum activation period to be ensured by FCR providers in accordance with Article 156(10);

Article 156(9)

For the CE and Nordic synchronous areas, each FCR provider shall ensure that the FCR from its FCR providing units or groups with limited energy reservoirs are continuously available during normal state. For the CE and Nordic synchronous areas, as of triggering the alert state and during the alert state, each FCR provider shall ensure that its FCR providing units or groups with limited energy reservoirs are able to fully activate FCR continuously for a time period to be defined pursuant to paragraphs 10 and 11. Where no period has been determined pursuant to paragraphs 10 and 11, each FCR provider shall ensure that its FCR providing units or groups with limited energy reservoirs are able to fully activate FCR continuously for at least 15 minutes or, in case of frequency deviations that are smaller than a frequency deviation requiring full FCR activation, for an equivalent length of time, or for a period defined by each TSO, which shall not be greater than 30 or smaller than 15 minutes.

Article 156(10)

For the CE and Nordic synchronous areas, all TSOs shall develop a proposal concerning the minimum activation period to be ensured by FCR providers. The period determined shall not be greater than 30 or smaller than 15 minutes. The proposal shall take full account of the results of the cost-benefit analysis conducted pursuant to paragraph 11.

II. The TSO proposal

The minimum activation time to be ensured by FCR providers proposal was submitted to the NRAs on April 14, 2021, together with a separate document on the result of their public consultation. The proposal from the TSOs suggests a minimum activation time to be ensured by FCR providers to be 15 minutes. This period is within the requirement given in article 156(10) that the activation time should be between 15 minutes and 30 minutes. The proposed period of 15 minutes is based on the result from the cost benefit analysis (CBA) conducted according to article 156(11). The methodology for the CBA was approved by the NRAs in April 2019. The NRAs received the results from the CBA in June 2020. A description of the impact of the minimum activation time to be ensured by FCR providers proposal on the objectives of Regulation 2017/1485 was included in the proposal. An implementation timeline is included in the proposal.

Regulation 2017/1485 requires NRAs to consult and closely cooperate and coordinate with each other in order to reach agreement and make decisions within six months following receipt of submissions of the last NRA concerned. A decision is therefore required by each NRA by October 14, 2021.

III. NRAs' position

The minimum activation time to be ensured by FCR providers proposal dated April 14, 2021 propose the same activation period of 15 minutes as the result of the CBA conducted in accordance with article 156(11) approved by the NRAs.

As this minimum activation time is based on a CBA conducted the TSOs shall, if needed based on changes in topology, load, generation or other relevant factors in the synchronous area, conduct a new CBA according to article 156(11). NRAs should be informed by the results of such analysis, and if needed based on the results the TSOs should propose to amend the methodology given by article 156(10).

It is important to have a common understanding of the implementation of the methodology. The implementation and the transparency of the methodology must be clarified after the national decisions.

The NRAs have reached an agreement that the minimum activation time to be ensured by FCR providers proposal can be approved.

IV. Conclusions

All NRAs have assessed, consulted and closely cooperated to reach an agreement that the minimum activation time to be ensured by FCR providers proposal meet the requirements of Regulation 2017/1485 and as such can be approved by all NRAs.

NRAs shall, based on this agreement, make their national decisions by October 14, 2021. The minimum activation time to be ensured by FCR providers proposal will be adopted upon the decision of the last the NRA in the synchronous area. Following the national decisions by all NRAs, TSOs are required to publish the minimum activation time to be ensured by FCR providers proposal as approved, according to Article 8(1) of Regulation 2017/1485. All TSOs must respect the implementation deadlines provided in the minimum activation time to be ensured by FCR providers proposal.