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42418-185 NKC/ATR

## **CONSULTATION LETTER ON TECHNICAL REGULATION 3.4.2 - MANUAL DISCONNECTION OF TRANSMISSION CONNECTED DEMAND FACILITIES.**

On 27 November 2020, Energinet submitted for consultation the technical regulation 3.4.2 on manual disconnection of transmission connected demand facilities and related guidance notes ("Technical Regulation").

This consultation letter is sent on behalf of Google and contains Google's comments to the Technical Regulation and guidelines submitted by Energinet.

Please let us know if you would like a translated Danish version of this letter.

### **1 MANUAL DISCONNECTION - STEPS AND FULL DISCONNECTION**

Pursuant to section 2 of the Technical Regulation, the manual disconnection shall take place either in steps as follows:

"transmission connected demand facilities connected in synchronous area CE must have 10 manual disconnection steps of 8%

transmission connected demand facilities connected in synchronous area N must have 16 manual disconnection steps of 5%,"

or as a full disconnection as follows:

"Manual disconnection as a full disconnection of the transmission connected demand facility."

With respect to the full disconnection, it is unclear what a full disconnection of the "facility" shall mean. This could either be understood as a full disconnection of the whole site and thus potentially a disconnection of a very large load of potentially XXX MW or understood as a disconnection of part of a site e.g. a facility in the form of a building, which would represent XX MW load.

If the full disconnection of the "facility" shall be understood as only a disconnection of the full site, this could potentially cause a very large disruption to the grid, which is neither in the interest of Google nor Energinet. Consequently, a disconnection of a facility in the form of part of a site, i.e. a building, is preferred. Reference is in this respect made to previous discussions between Energinet and Google on LFDD.

On the basis of the above, we request Energinet to update section 2 of the Technical Regulation to the effect that it is clear that the full disconnection of the facility does not solely refer to a disconnection of the full site, but also to a disconnection of part of the site in the form of a building. Such update would be in compliance with the approach taken by Energinet for the LFDD.

The above also applies to the manual reconnection, which pursuant to section 3 shall take place in the same manner as a disconnection under section 2.

## **2 THE DISCONNECTING PARTY**

In the guidelines to the Technical Regulation, the following is stated in section 2.1 and 2.2:

"Energinet

- notifies the operations responsible party if activation of manual disconnection is required. [...]

Party responsible for the operation of the transmission connected demand facility

- is responsible for disconnection according to the method chosen within the required period of time."

Pursuant to the Technical Regulation, it is therefore the transmission connected demand facility that must manually disconnect the facility and not Energinet, as is the case in the LFDD scheme.

As stated in the guidelines to the Technical Regulation, a manual disconnection will only take place in the event of imminent risk of electricity shortage; prevention or resolution of critical overload; and/or network under-voltage. Furthermore, manual disconnection will be the final tool available to Energinet's control center in the above-mentioned situations, where all measures have been activated in the individual markets but are inadequate for resolving the strained supply situation.

A manual disconnection will therefore only take place in extreme circumstances, which are very unlikely to occur but nonetheless would necessitate hiring multiple additional highly skilled and qualified staff, making them available on a 24x7 shift system, just in case, to perform this manual disconnection. This is not proportionate to the necessity of having the transmission connected demand facility perform the manual disconnection. The disconnection could instead be performed by Energinet, as is already the case with the LFDD.

Consequently, Google suggest that the Technical Regulation is amended to the effect that it is possible that Energinet can conduct the disconnection rather than the transmission connected demand facility.

## **3 DECISION ON WHICH TRANSMISSION CONNECTED CONSUMERS ARE TO BE DISCONNECTED**

According to the guidelines to the Technical Regulation, Energinet is entitled to decide on which transmission connected consumers are to be disconnected. Section 2.9 states the following:

"Based on the given situation, Energinet's Control Center EI decides whether all or only some transmission connected consumers are to be disconnected.

If the situation permits it, Energinet's Control Center EI must seek to achieve an evenly distributed disconnection between the transmission connected consumers under Regulation 3.4.2 and the distribution companies' manual disconnection solution, see Regulation 2.1.2, which is comparable to this Regulation."

In this respect, Google requests Energinet to answer how they will prioritize, which transmission connected demand facilities shall be disconnected and which shall not, including which criteria are to be applied by Energinet in this regard. Are there any written decision making or prioritization guidelines available, which set out the criteria for which facilities are to be disconnected and which are not?

## **4 COMMUNICATION**

According to the guidelines to the Technical Regulation, communication between Energinet and the transmission connected demand facility shall take place as follows:

"Energinet

- is responsible for sending the signals which activate the manual disconnection via the network telegraph
- is responsible for sending the signals which activate manual reconnection after manual disconnection via the network telegraph [...]

Party responsible for the operation of the transmission connected demand facility

- is responsible for receiving signals from Energinet via the network telegraph for activation of manual disconnection or reconnection.

Communication between Energinet's Control Center EI and the operations responsible party must take place by secure communication, see Energinet's Regulation 5.3.4.1 Network telegraph."

In the Technical Regulation, reference is made to the existing technical regulation no. 5.3.4.1 on the network telegraph. This technical regulation does, however, not apply to transmission connected demand facilities, but only to net/distribution companies. Transmission connected demand facilities have therefore not implemented nor planned to implement the systems necessary to apply the communication system set out in the Technical Regulation. The implementation of the Technical Regulation, i.e. the implementation of the net telegraph system, will therefore put further costs on the transmission connected demand facility.

Furthermore, as the technical regulation no. 5.3.4.1 on the network telegraph does not apply to transmission connected demand facilities, the implementation of the systems will only be necessary as a consequence of the Technical Regulation. The costs connected to the implementation of the net telegraph system are therefore not proportionate to the necessity of such system, as other means of communication can be applied, see below. Lack of proportionality also follows from the fact that a manual disconnection will only take place in extreme circumstances, which are very unlikely to occur, see further above under section 2.

In Google's opinion, a relevant means of communication would be telecommunication, whereby Energinet contacts the control room operator by telephone in case a manual disconnection is necessary. Such communication can take place quickly and within the time limits set out in the Technical Regulation.

To Google's knowledge, there are only few transmission connected demand facilities, which will be subject to the Technical Regulation, i.e. which will be connected to the transmission grid after the date of commencement of the Regulation (to be expected on 1 February 2021). From a practical point of view, it would therefore not or only to a limited extent be more cumbersome for Energinet to use telecommunication as the mean of communication rather than the network telegraph.

Consequently, Energinet is requested to change the means of communication to the effect that the customer control room may be contacted via telephone and not the network telegraph.

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If you have any questions to the above or need further elaboration on any of the mentioned points, please don't hesitate to contact me. Please also be informed, that should there be such a need, Google is open to having a meeting to discuss the abovementioned issues.

Yours sincerely  
Niklas Korsgaard Christensen



Anne-Sophie Bundesen  
Attorney-at-law, director