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“Stakeholder consultation on amended proposal of all Nordic TSOs for additional properties of FCR”

Vattenfall welcomes the opportunity to provide further comments on the amended proposal.

Generally, Vattenfall supports the development of the proposal, and we believe that the previous stakeholder dialogue has led to positive improvements of the proposal.

As previously expressed, our ambition is to achieve rational and sensible requirements that support a secure system in a cost efficient manner for society and end customers.

To this end, we strongly encourage the continuation of the already running dialogue on Nordic technical requirements between FCR providers and the Nordic TSOs. We are convinced that this dialogue has the potential to meet the future system requirements in an efficient manner.

Same restrictions on response times applies to FCR-d (down)

In article 4 the additional properties for FCR-D are set to: *should be activated to 50% within 5 seconds and to 100% within 30 seconds.*

As previously stated (response by Swede Energy) a requirement corresponding to "30% within 5 seconds and to 50% within 30 seconds" is regarded as more reasonable for the safe operation of the Nordic synchronous system. We would hereby like to confirm that this objection also applies to the product FCR-d down, and we want to encourage the TSOs to use the stakeholder dialogue on technical requirements for FCR that is already underway as a forum for establishing cost-effective and secure technical requirements.

Detailed comments

- The proposal indicate that the regulatory framework allow for that the “power-generating module shall be capable of providing full active power frequency response for a period of between 15 and 30 minutes as specified by the relevant TSO.” We encourage the Nordic TSOs to make clear which option that is preferred. With the potential from the demand side a standard of 15 minutes would be most suitable.

- Furthermore, the requirement under Article 4a says: "*Downward FCR-D shall be activated at 50.10 Hz and shall be fully activated at 50.5 Hz. It should increase almost linearly within a system frequency range of 50.10-50.50 Hz.*" We want to emphasize that incremental regulation within the "blue zone" should be ok. This too is crucial to allow for a cost efficient development of contributions from aggregated resources from the demand side.
- We ask for a clarification of the concept virtual linearity referred to article 4.1.

Kind regards,



Cecilia Hellner
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