Unique_comment_ID	Comment refers to line number	Comment refers to Article	Comment refers to Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer name	Organisation / Affiliation
01		8		Bonjour, I first want to thank you for the transparency effort that this consultation represents. This is my first contribution. Beeing non familiar with all the codes and regulations and their future changes, my contributions may be inaproprioate. Having a tool to predict the adequacy of anticipated productions and loads and a check that the transmission capacities are available to connect them at different timescale is a pre-requisite to achieve the goal of 'ensuring the safe operation of the connected system.'. The proposal of the specifications of your common tool and of the individual grid models seems to fullfil this prerequisite. Nevertheless, I feel like some informations and some capacities of this common model are missing and may prevent the security coordinators to achieve the objective "e" define in Paragraphe 1 of article 20 : "identify violations of operational security limits". With the development of new cross borders markets such as Frequency Restoration Reserves, some TSOs will be purchasing security/ancillary services abroad. For instance, Belgium TSO is clearly describing this in the study (1) as the prefered options so as no to built new gaz power plants that may increase the local CO2 emissions despite (or worse because of !) the developpment of renewables. If for some reasons, some interconnections are triping or being congested, it is possible at least theoretically, that the adequacy is reached locally, but that the different type of reserves may not be fully available, which would be a violation of the operational security limits. My comment is that the contributions of the generation capacities to ancillary services markets, in particular outside of their associated TSO grid should be given in their description. This may help the security coordinators to be aware of potential of such situations. Bonne journée,	The purpose of the CGM process is to prepare the CGM which is designed in order to run steady-state computations. These computations do not take into account explicitly the modelling of reserves as well as other elements that are out of scope of this type of model such as dynamic data. However, you are right in noting that the constraints could arise from exchanges of balancing power and that these need to be taken into account. This is done, for example, by setting appropriate safety margins in the different business processes using the CGM. Thus the CGM model covers the needs of SO GL services.	Adrien Bidaud	Grenoble Institute of Technology / CNRS / Université Grenoble Alpes, France
02		8 generation and 9 load		Bonjour, I first want to thank you for the transparency effort that this consultation represents. This is my first contribution. Beeing non familiar with all the codes and regulations and their future changes, my contributions may be inaproprioate. Having a tool to predict the adequacy of anticipated productions and loads and a check that the transmission capacities are available to connect them at different timescale is a pre-requisite to achieve the goal of 'ensuring the safe operation of the connected system.'. The proposal of the specifications of your common tool and of the individual grid models seems to fullfil this prerequisite. Nevertheless, I feel like some informations and some capacities of this common model are missing and may prevent the security coordinators to achieve the objective "e" define in Paragraphe 1 of article 20 : "identify violations of operational security limits". It is being said that during the last black out that was followed by a separation of european grid on different smaller grid, the unsollicited reconnection of hundreds of MW of wind power contributed to reduce the speed of grid restoration. I do not know how and if this question triggered specific points in the recent network codes. Given the enormous and growing amount of decentralised productions compared to reducing dispatchable generation, the availability a certain amount of dispatchable generation capacities must be monitored carefully. As the required generation capacity may be connected outside of the TSO control zone trough european connections, this information should be made visible to the regional security coordinator in the GCMM. My comment is that the reconnection procedure (automatic or authorized by the TSO) of generation and load capacities should be given in their description.	This kind of event is out of scope of the services that will use the CGM according to SO GL. Thus the CGM does not model the reconnection procedure as you describe it.	Adrien Bidaud	Grenoble Institute of Technology / CNRS / Université Grenoble Alpes, France

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~~03~~	~~227-229~~	~~2~~		~~Add at the end of Article 2:~~ ~~In addition, the following definitions shall apply:~~ ~~1. 'adjacent grids' means the areas not part of but bordering on the transmission system for which an IGM is being created;~~ ~~Justification:~~ ~~The amendment is necessary to facilitate the changes proposed in the following comments of innogy. "Adjacent grids" are not limited to transmission grids but might also be distribution grids. This should be respected by the definition. DSOs do not see the need to define "adjacent grid" as "control area or bidding zone", as is the case in CGMMv2. The definition from CGMMv2 is problematic, too. Bidding zones are subject to Change and might stretch out to more than one TSO, whereas the term "control area" is not defined in SOGL or any underlying European legislation.~~	Comment needed to be restated; see below.	~~Michael Wilch~~	~~innogy SE~~
03_restated_01_of_03	227-229	2		(restated comment; part 1 of 3) Article 2 - Original version: For the purposes of this proposal, the terms used shall have the meaning of the definitions included in Article 3 of Regulation 2017/1485 and the other items of legislation referenced therein as well as Article 2 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222. Article 2 - Proposed version: For the purposes of this proposal, the terms used shall have the meaning of the definitions included in Article 3 of Regulation 2017/1485 and the other items of legislation referenced therein as well as Article 2 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222. In addition, the following definitions shall apply: 1. 'adjacent grids' means the areas not part of but bordering on the transmission system for which an IGM is being created;	As for the definition of "adjacent grids", note that Article 2(1) of the CGMM-v1-plus defines "adjacent grids" as follows: "adjacent grids' means the areas not part of but bordering on the control area or bidding zone for which an IGM is being created;" The term "adjacent grid" is used in a very specific way in the CGMM-v1-plus which has been approved and is in force. Regardless of the merits of the proposal, changing the definition of "adjacent grids" would potentially lead to inconsistencies.	Drafting team on behalf of Michael Wilch (cf. email sent by MW 2017-12-04-1703h)	PT CGM WP-1
03_restated_02_of_03	227-229	2		(restated comment; part 2 of 3; "justification") "In the view of innogy, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 64.1 of the SOGL regulation) and to prescribe that “The individual grid models shall include the structural information and data set out in Article 41.” (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to “transformers connecting the DSOs” (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution-system related data in their IGM. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs’ individual grid models (IGMs) “shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame” (Article 5 of the draft CGMM proposal). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. innogy therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level. Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition.	The claim that "the high-voltage grids are not part of the transmission system" in Germany seems not to be in line with the position of Germany's regulator BNetzA in its 08 December 2017 approval of the GLDPM-v2. To keep consistency between methodology and acknowledge the common understanding of the Network Codes requirements up to now, we would prefer to stick to our proposal.	Drafting team on behalf of Michael Wilch (cf. email sent by MW 2017-12-04-1703h)	PT CGM WP-1

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03_restated_03_of_03	227-229	2		(restated comment; part 3 of 3; "justification" continued) The limitation of IGM and CGM to elements of the transmission system can consistently be derived from SOGL. Article 41.3.b, which gives more information on the establishment of the common grid model, reads:"[…] to establish the common grid model, […]each TSO shall exchange […]:(b) a model or an equivalent of the transmission system with voltage below 220 kV with significant impact on its own transmission system; […]". That means there is a twofold exclusion of distribution systems from the CGM: not only is the CGM limited to elements of the transmission system, but specifically to those elements of the transmission system with significant impact on the transmission system of a neighbouring TSO. Both provisions make clear distribution elements cannot be part of the CGM. Next to the provision in Article 5, innogy sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From innogy's point of view, this provision is not based on the requirements laid down in the SOGL regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which shall also contain distribution systems. Hence, innogy asks for rephrasing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal. Additionally, the definition of "adjacent grids" must be adapted, as it currently uses "control area or bidding zone" instead of "transmission system", following Article 2.1 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222."	The CGM methodology states that mandatory elements are : - the ones of 220 kV and above - the elements needed for an appropriate representation of the grid The implementation of these requirements are under the responsibility of the TSOs, having in mind the aim of the global CGM process. Thus, it seems to us that your concern is not in the scope of the CGM Methodology as a pan-european methodology. The legal definition of a "control area" is given in Article 2(6) of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council: 'control area' means a coherent part of the interconnected system, operated by a single system operator and shall include connected physical loads and/or generation units if any;	Drafting team on behalf of Michael Wilch (cf. email sent by MW 2017-12-04-1703h)	
~~04~~	~~332-333~~	~~5~~	~~1~~	~~1. IGMs shall contain the elements of the high-voltage and extra high-voltage transmission network insofar as these are used in regional operational security analysis for the concerned time frame.~~ ~~[....]~~ ~~SOGL prescribes that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution system related data in their IGM.~~ ~~However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal).~~ ~~This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. innogy therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level.~~ ~~Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition.~~ ~~The limitation of IGM and CGM to elements of the transmission system can consistently be derived from SOGL. Article 41.3.b, which gives more information on the establishment of the~~	Comment needed to be restated; see below	~~Michael Wilch~~	~~innogy SE~~
04_restated	332-333	5	1	Article 5 - Original Version "1. IGMs shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame. [....]" Article 5 - Proposed Version "1. IGMs shall contain the elements of the high-voltage and extra high-voltage transmission network insofar as these are used in regional operational security analysis for the concerned time-frame. [....]" Explanation: see 03_restated_02_of_03 and 03_restated_03_of_03	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Drafting team on behalf of Michael Wilch (cf. email sent by MW 2017-12-04-1703h)	PT CGM WP-1

Unique_comment_ID	Comment refers to line number	Comment refers to Article	Comment refers to Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer name	Organisation / Affiliation
~~05~~	~~344-349~~	~~6~~	~~1~~	~~Change to: "1. The transmission grid elements described in paragraph 2 of this Article shall be included in each IGM if these grid elements are of a voltage level a. of 220 kV or above; b. of less than 220 kV and the grid elements of which are used in regional operational security analysis." SOGL prescribes that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution system related data in their IGM. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. innogy therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level. Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition. The limitation of IGM and CGM to elements of the transmission system can consistently be~~	Comment needed to be restated; see below	~~Michael Wilch~~	~~innogy SE~~
05_restated	344-349	6	1	Article 6 - Original version "1. The grid elements described in paragraph 2 of this Article shall be included in each IGM regardless of whether these are operated by the TSO or a DSO (including CDSO) if these grid elements are of a voltage level a. of 220 kV or above; b. of less than 220 kV and the grid elements of which are used in regional operational security analysis. [....] A model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV shall be included in the IGM regardless of whether these parts of the grid are operated by the TSO or a DSO (including CDSO) if a. these parts of the grid have elements which are used in regional operational security analysis, or b. the relevant grid elements in those parts of the grid are connecting i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level; ii. two nodes at the 220 kV or higher voltage level. [...]" Article 6 - Proposed version "1. The transmission grid elements described in paragraph 2 of this Article shall be included in each IGM if these grid elements are of a voltage level a. of 220 kV or above; b. of less than 220 kV and the grid elements of which are used in regional operational security analysis. [....] An equivalent model of those parts of the grid operated at a voltage of less than 220 kV shall be included in the IGM regardless of whether these parts of the grid are operated by the TSO or a DSO (including CDSO) if a. these parts of the grid have elements which are used in regional operational security analysis, or b. the relevant grid elements in those parts of the grid are connecting i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level; ii. two nodes at the 220 kV or higher voltage level. System operators may agree on using models instead of equivalent models. [...]" Explanation: see 03_restated_02_of_03 and 03_restated_03_of_03	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Drafting team on behalf of Michael Wilch (cf. email sent by MW 2017-12-04-1703h)	PT CGM WP-1

Unique_comment_ID	Comment refers to line number	Comment refers to Article	Comment refers to Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer name	Organisation / Affiliation
~~06~~	~~360-368~~	~~6~~	~~3~~	~~Change to:"An equivalent model of those parts of the grid operated at a voltage of less than 220 kV shall be included in the IGM regardless of whether these parts of the grid are operated by the TSO or a DSO (including CDSO) if~~ ~~a. these parts of the grid have elements which are used in regional operational security analysis, or~~ ~~b. the relevant grid elements in those parts of the grid are connecting~~ ~~i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level;~~ ~~ii. two nodes at the 220 kV or higher voltage level.~~ ~~System operators may agree on using models instead of equivalent models.~~ ~~[…]"~~ ~~SOGL prescribes that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution system related data in their IGM.~~ ~~However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal).~~ ~~This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. innogy therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level.~~ ~~Without doubt it is subject to the member states to define which part of the interconnected~~	Comment needed to be restated	~~Michael Wilch~~	~~innogy SE~~
07	18-20	Whereas	-1	EDF welcomes this ENTSO-E consultation on the TSOs common proposal for a common grid model methodology in accordance with Article 67(1) and 70(1) of Regulation 2017/1485 establishing a guideline on electricity transmission system operation (SOGL). Indeed, the involvement of stakeholders in the implementation process of the CACM, FCA and SOGL Guidelines is of paramount importance to ensure the transparency and accountability of the proposals made by TSOs. Therefore, stakeholders should play an active role in the process for the elaboration of the methodologies as well as in their regional or national implementation. Moreover, TSO's proposals of terms and conditions and methodologies deriving from Guidelines and Network Codes are often liable to have significant impacts on grid users and market participants, so that the proposed solutions should be backed by impact assessments and cost-benefit analyses, where needed. EDF would like to reiterate its requests for the access of the market participants to the IGMs and CGMs. The reason for keeping CGMs data confidential is not very clear, especially for long-term timeframes, as far as they reflect the best forecast made by system operators without any confidential or commercially sensitive information. The availability of this data would be useful to provide stakeholders with a better visibility on the level of available cross-border capacity and to enable market participants to better anticipate the potential evolutions of market prices. It may also contribute to improve the accuracy of the forecasts provided by Significant Grid Users (SGUs). A good level of transparency on the CGMs would also be consistent with : (i)the objectives of SOGL Regulation which notably aims at ensuring and enhancing the transparency and reliability of information on transmission system operation (Article 4.1 (g)) (ii)the obligations imposed on TSOs by the Third Energy Package to provide estimates and information on the available transfer capacity of their networks and on the availability and use of generation and load assets (article 15 of Regulation 714/2009	On the publication of IGMs and CGMs we refer to our explanations on this point in the Response to Consultation Comments for the CGMM pursuant to Regulation 2015/1222	Nadia HENRY	EDF
08	21-31	Whereas	-2	EDF takes note that this "CGMM Proposal", as defined in the title of the document and in Whereas (2) covers requirements stipulated in Article 67(1) and 70(1) of SOGL Regulation. It is not completely clear whether this CGMM proposal is to encompass the three network codes CACM, FCA and SOGL, as so many references to CACM and FCA have now disappeared from the articles. For sake of clarity and simplicity, the CGM Methodology requirements for these three networks codes should be included in the same document. In the previous version of the CGMM methodology submitted to consultation, "CGMM v2", ENTSOE had taken this approach, by including additional requirements from FCA regulation to the existing CGM methodology for CACM regulation.	TSOs are bound by the regulators' requirement that a dedicated methodology be prepared for each of the three Network Codes / Guidelines that require a Common Grid Model Methodology	Nadia HENRY	EDF
09	132	Whereas	-3	Concerning the definition of the "best possible forecast" of transmission system to be used in each individual grid model, EDF would like to stress the fact that TSOs should not take into account to the nature of long term rights. This is to prevent any bias related with political agreements on minimum interconnection capacity on specific borders.	This topic is outside the scope of the CGMM.	Nadia HENRY	EDF

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10	196-197	Article 1	1.	EDF takes note that the scope of this “CGMM Proposal” covers requirements stipulated in Article 67(1) and 70(1) of SOGL Regulation. It is not completely clear whether this CGMM proposal is to encompass the three network codes CACM, FCA and SOGL, as so many references to CACM and FCA have now disappeared from the articles. For sake of clarity and simplicity, the CGM Methodology requirements for these three networks codes should be included in the same document. In the previous version of the CGMM methodology submitted to consultation, “CGMM v2”, ENTSOE had taken this approach, by including additional requirements from FCA regulation to the existing CGM methodology for CACM regulation.	TSOs are bound by the regulators' requirement that a dedicated methodology be prepared for each of the three Network Codes / Guidelines that require a Common Grid Model Methodology	Nadia HENRY	EDF
11	234	3	1	In the previous consultation for CGMM v2, TSOs had proposed to publish the scenarios built for year ahead and month ahead IGMs (including their descriptions and the periods they are to be used) and make them available publicly to market participants, as part of the data to be provided in the Biennal Report on capacity calculation and allocation provided to ACER pursuant to Article 31(3) of Regulation 2015/1222 and Article 26(3) of Regulation 2016/1719, respectively. EDF would like to clarify that the scenarios developed under Article 65 of SOGL Regulation will also be available publicly.	The year-ahead scenarios are explicitly out of the scope of the CGMM-v3, so it would not be appropriate for the CGMM drafting team to comment on this point. However, the wording of Article 65(4) of the SO GL seems clear enough: to publish means to make publicly available.	Nadia HENRY	EDF
12	1038-1040	24	3.c	EDF welcomes TSO’s’ proposal to publish on the internet the algorithm for CGM alignment as described in Article 19 of the CGMM proposal. This will enhance transparency ensure accountability of the TSO proposals. Moreover, it enables interested parties to contribute to the improvement of the methodologies used by TSOs, with a benefit on the efficiency of the system operation.	We are pleased to read that you endorse our proposal	Nadia HENRY	EDF
13	1054-1055	24	5	EDF welcomes TSO’s proposal to publish on a yearly basis the available data related to the quality criteria that the IGM, CGM, and CGM alignment algorithm have to meet. This will enhance transparency ensure accountability of the TSO proposals. Moreover, it enables interested parties to contribute to the improvement of the methodologies used by TSOs, with a benefit on the efficiency of the system operation.	We are pleased to read that you endorse our proposal	Nadia HENRY	EDF
14	332	Article 5	1	The aim of the common grid model methodology is to enable the TSOs to establish a common grid model, based on the data received by distribution system operators (DSOs) as well as grid users as described in the GLDPM or the SO GL. The interdependencies between transmission grids cause TSOs to have to synchronise not only the operation but also the planning of their grids. Therefore, BDEW supports the idea to establish a common grid model (CGM) in order to enable TSOs to develop their transmission networks in accordance with the demands of the next decades. In the view of BDEW, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 17.2.b of the CACM regulation) and to prescribe that “individual grid models shall cover all network elements of the transmission system that are used in regional operational security analysis for the concerned time-frame” (Article 19.3 of the CACM regulation; our emphasis). The SO GL also not expands these specifications. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs’ individual grid models (IGMs) “shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame” (Article 5 of the draft CGMM proposal; our emphasis). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by the TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying CACM regulation. This is not in line with the basics of European legislation. BDEW therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is run by the TSOs. With regard to the incoherency with the underlying CACM regulation, BDEW would very much welcome a revision of the above mentioned requirements in the CGMM proposal.	The claim that "the high-voltage grids are not part of the transmission system" in Germany seems not to be in line with the position of Germany's regulator BNetzA in its 08 December 2017 approval of the GLDPM-v2. To keep consistency between methodology and acknowledge the common understanding of the Network Codes requirements up to now, we would prefer to stick to our proposal.	Laura Emmermacher	BDEW
15	344	Article 6	Articles 6.1 and 6.3	Next to the provision in Article 5, BDEW sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be in-cluded in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run ei-ther by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From BDEW’s point of view, this provision is not based on the requirements laid down in the CACM regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which also contain distribution systems. Hence, BDEW asks for rephras-ing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal. With regard to the incoherency with the underlying CACM regulation, BDEW would very much welcome a revision of the above mentioned requirements in the CGMM proposal.	We are puzzled by the reference to the CACM GL, as this CGMM-v3 is prepared pursuant to the SO GL. The CGM methodology states that mandatory elements are : - the ones of 220 kV and above - the elements needed for an appropriate representation of the grid The implementation of these requirements are under the responsibility of the TSOs, having in mind the aim of the global CGM process. Thus, it seems to us that your concern is not in the scope of the CGM Methodolgy as a pan-european methodology. The legal definition of a "control area" is given in Article 2(6) of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council: ‘control area’ means a coherent part of the interconnected system, operated by a single system operator and shall include connected physical loads and/or generation units if any;	Laura Emmermacher	BDEW

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16		2		Proposed version: For the purposes of this proposal, the terms used shall have the meaning of the definitions included in Article 3 of Regulation 2017/1485 and the other items of legislation referenced therein as well as Article 2 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222. In addition, the following definitions shall apply: 1. 'adjacent grids' means the areas not part of but bordering on the transmission system for which an IGM is being created; Justification: In the view of EURELECTRIC, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 64.1 of the SOGL regulation) and to prescribe that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution-system related data in their IGM. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. EURELECTRIC therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level. Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition. The limitation of IGM and CGM to elements of the transmission system can consistently be derived from SOGL. Article 41.3.b, which gives more information on the establishment of the common grid model, reads:"[…] to establish the common grid model, […]each TSO shall exchange […]:(b) a model or an equivalent of the transmission system with voltage below 220 kV with significant impact on its own transmission system; […]". (tbc)	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Sanni Aumala	EURELECTRIC
17		2		(continuing) That means there is a twofold exclusion of distribution systems from the CGM: not only is the CGM limited to elements of the transmission system, but specifically to those elements of the transmission system with significant impact on the transmission system of a neighbouring TSO. Both provisions make clear distribution elements cannot be part of the CGM. Next to the provision in Article 5, EURELECTRIC sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From EURELECTRIC's point of view, this provision is not based on the requirements laid down in the SOGL regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which shall also contain distribution systems. Hence, EURELECTRIC asks for rephrasing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal. Additionally, the definition of "adjacent grids" must be adapted, as it currently uses "control area or bidding zone" instead of "transmission system", following Article 2.1 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222.	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Sanni Aumala	EURELECTRIC

Unique_comment_ID	Comment refers to line number	Comment refers to Article	Comment refers to Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer name	Organisation / Affiliation
18		5		Proposed version: 1. IGMs shall contain the elements of the high-voltage and extra high-voltage transmission network insofar as these are used in regional operational security analysis for the concerned time-frame. [....] Justification: In the view of EURELECTRIC, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 64.1 of the SOGL regulation) and to prescribe that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution-system related data in their IGM. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. EURELECTRIC therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level. Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition. The limitation of IGM and CGM to elements of the transmission system can consistently be derived from SOGL. Article 41.3.b, which gives more information on the establishment of the common grid model, reads:"[…] to establish the common grid model, […]each TSO shall exchange […]:(b) a model or an equivalent of the transmission system with voltage below 220 kV with significant impact on its own transmission system; […]". (tbc)	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Sanni Aumala	EURELECTRIC
19		5		(continuing) That means there is a twofold exclusion of distribution systems from the CGM: not only is the CGM limited to elements of the transmission system, but specifically to those elements of the transmission system with significant impact on the transmission system of a neighbouring TSO. Both provisions make clear distribution elements cannot be part of the CGM. Next to the provision in Article 5, EURELECTRIC sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From EURELECTRIC's point of view, this provision is not based on the requirements laid down in the SOGL regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which shall also contain distribution systems. Hence, EURELECTRIC asks for rephrasing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal. Additionally, the definition of "adjacent grids" must be adapted, as it currently uses "control area or bidding zone" instead of "transmission system", following Article 2.1 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222.	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Sanni Aumala	EURELECTRIC
20		6		Proposed version: 1. The transmission grid elements described in paragraph 2 of this Article shall be included in each IGM if these grid elements are of a voltage level a. of 220 kV or above; b. of less than 220 kV and the grid elements of which are used in regional operational security analysis. [....] An equivalent model of those parts of the grid operated at a voltage of less than 220 kV shall be included in the IGM regardless of whether these parts of the grid are operated by the TSO or a DSO (including CDSO) if a. these parts of the grid have elements which are used in regional operational security analysis, or b. the relevant grid elements in those parts of the grid are connecting i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level; ii. two nodes at the 220 kV or higher voltage level. System operators may agree on using models instead of equivalent models. [...]	The CGM methodology states that mandatory elements are : - the ones of 220 kV and above - the elements needed for an appropriate representation of the grid The implementation of these requirements are under the responsibility of the TSOs, having in mind the aim of the global CGM process. Thus, it seems to us that your concern is not in the scope of the CGM Methodolgy as a pan-european methodology. The legal definition of a "control area" is given in Article 2(6) of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council: 'control area' means a coherent part of the interconnected system, operated by a single system operator and shall include connected physical loads and/or generation units if any;	Sanni Aumala	EURELECTRIC

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				Justification: In the view of EURELECTRIC, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 64.1 of the SOGL regulation) and to prescribe that "The individual grid models shall include the structural information and data set out in Article 41." (Article 64.2 of the regulation SOGL). Obviously, Article 41 of SOGL describes exclusively elements of the transmission system down to "transformers connecting the DSOs" (Article 41.1.c of SOGL). Structural data of distribution systems are described in Article 48 of SOGL and, as evidenced by Article 64.2, SOGL does not entitle TSOs to include detailed distribution-system related data in their IGM. However, the present CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame" (Article 5 of the draft CGMM proposal). This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying SOGL regulation. This is not in line with the basics of European legislation. EURELECTRIC therefore pledges to overhaul the provision in Art. 5 of the draft CGMM proposal and to limit its scope of application to those elements which are part of the grid which is regarded transmission on national level. Without doubt it is subject to the member states to define which part of the interconnected system is regarded transmission and which is distribution (cf. Article 2.3 and Article 2.5 of Directive 2009/72/EC). Following the principle of subsidiarity (Article 5(3) of the Treaty on European Union), it is at the discretion of the member state to find a proper demarcation between transmission and distribution, as it is left open in the corresponding Directive. Neither ENTSO-E nor any TSO is entitled to change this definition. The limitation of IGM and CGM to elements of the transmission system can consistently be derived from SOGL. Article 41.3.b, which gives more information on the establishment of the common grid model, reads:"[…] to establish the common grid model, […]each TSO shall exchange […]:(b) a model or an equivalent of the transmission system with voltage below 220 kV with significant impact on its own transmission system; […]". (tbc)			
21		6		(continuing) That means there is a twofold exclusion of distribution systems from the CGM: not only is the CGM limited to elements of the transmission system, but specifically to those elements of the transmission system with significant impact on the transmission system of a neighbouring TSO. Both provisions make clear distribution elements cannot be part of the CGM. Next to the provision in Article 5, EURELECTRIC sees need for revision of Articles 6.1 and 6.3 of the present CGMM proposal. These Articles describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. From EURELECTRIC's point of view, this provision is not based on the requirements laid down in the SOGL regulation. It has to be made clear that, for grids of less than 220 kV, the provision of equivalent models for the distribution systems by the respective DSOs shall be deemed sufficient. This principle is already laid down in Article 11.3 of the present CGMM proposal which requires TSOs to make use of equivalent models of their adjacent grids, which shall also contain distribution systems. Hence, EURELECTRIC asks for rephrasing Articles 6.1 and 6.3 following the principles of Article 11.3 of the draft CGMM proposal. Additionally, the definition of "adjacent grids" must be adapted, as it currently uses "control area or bidding zone" instead of "transmission system", following Article 2.1 of the Common Grid Model Methodology pursuant to Article 17 of Regulation 2015/1222.	See reply to 03_restated_02_of_03 and 03_restated_03_of_03	Sanni Aumala	EURELECTRIC