

GC ESC Update DSO Entity

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Content

1. Recommendation 11 from the Iberian incident report
2. Key EU DSO Entity points for the “Have your say” NC RfG 2.0 consultation
3. EU DSO Entity’s concern about the need for DSO implementation guidance documentation

1 - Recommendation 11 from the Iberian incident report

- Draft Terms of Reference (ToR) for progression of this recommendation, exchanged between ENTSO-E and DSO Entity.
- Some initial divergences have emerged, in interpretation of the intent of the recommendation as written, between ENTSO-E and DSO Entity.
- At the time of writing, these are being worked through.
- If agreed wording can be found, intent remains to propose a draft ToR to the ESC CG for their consideration.

2 – Response to the “Have your say” consultation.



2 - Key EU DSO Entity responses to the “Have your say” consultation

- A. High voltage ride through
- B. Hierarchy of active power controls for generation
- C. Other DSO priorities:
 - i. Joint TSO-DSO developments of requirements;
 - ii. Efficacy of RoCoF anti-islanding protection
 - iii. Full reactive power and voltage control for Type A PGMs and EVs;
 - iv. The need to create a CBA review of application to all existing generation;
 - v. Class derogations
 - vi. Grid forming capability road map
 - vii. Certification of EVs and EVSE, harmonized standards

A – High voltage ride through (HVRT)

- The EU DSO Entity explained its concerns at length in the June 2026 ESC GC – that material is attached as an appendix.
- Since June, the Entity's view of the issue has not changed, but the Entity believes that the publication of the NC RfG 2.0 is an essential opportunity to introduce appropriate requirements.
- The Entity has recommended to the Commission in its consultation response that the NC RfG 2.0 should include a joint obligation on TSOs and DSOs nationally to create a road map for HVRT implementation within two years of entry into force of the NC RfG 2.0.
- The road map shall ensure that the appropriate recommendations from the Iberian incident report are included in the road map – see next slide for suggested legal text.

B – Hierarchy of active power controls

- DSOs have realised that the rapid and significant growth of flexible distributed energy resources (DER) in their networks may pose a new security risk during periods of frequency disturbance.
- In the near future, when DSOs are using DER flexibility to ensure that DSO plant remains within its ratings, a sudden frequency dip may cause all the DER to respond (LFSM-U) and increase its output.
- If this occurs when the DSO system is already depleted by a pre-existing plant outage, the rapid increase in active power may cause protection operation, leading to local blackout.
- If this occurs, for example, on a 110kV distribution system, the effects will be relatively wide spread.

B – Entity's suggestion for control hierarchy

- A simple solution may be simply re-order the hierarchy of controls in Articles 20.7 and 21.13.

Priority	From existing hierarchy		Priority	To proposed hierarchy
1	network and power-generating module protection;		1	network and power-generating module protection;
2	synthetic inertia, if applicable;		2	synthetic inertia, if applicable;
3	frequency control (active power adjustment)		3	power gradient constraint;
4	power restriction;		4	power restriction;
5	power gradient constraint		5	frequency control (active power adjustment)

- DSOs have a clear obligation for the management of local grid security, so this risk needs to be addressed.
- The Entity understands that this would have a significant effect on frequency management overall – so further discussion is warranted.

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3 – The EU DSO Entity's responsibility for guidance.



3.EU DSO Entity guidance

- There is no provision in the NC RfG 2.0 as drafted for the EU DSO Entity to create implementation guidance for DSOs and those connecting to DSOs' networks.
- The DSO Entity does not foresee a widespread need for guidance, but considering the increasing scope of the NC RfG 2.0 to apply to mass market devices which are connected to DSOs networks, there may be future issues where the ability to issue guidance for stakeholders in the formal form of an IGD may be beneficial.
- Suggested draft legal text as an addition to Article 53:
 3. Where there are distribution specific issues of implementation of this Regulation, EU DSO Entity, jointly with the ENTSO for electricity, shall have the right to provide non-binding written guidance for distribution system operators, power generating facility owners and other relevant stakeholders. EU DSO Entity may consult relevant stakeholders when providing non-binding guidance.
 4. The ENTSO for Electricity and the EU DSO Entity shall publish the provided guidance on its their respective websites.

Thank you for your attention
Questions?
Please contact us!