

Comments on facility-data correction status and flexibility-group qualification transitions in consultation 2026/783

Submitted to: Statnett, consultation 2026/783 From: Elias Kunnas, independent analyst of technical-regulatory systems, Finland. Date: 13 August 2026

I do not represent a licensee, balance service provider, grid operator or other Norwegian market participant. This response is limited to the internal completeness, traceability and lifecycle semantics of the proposed procedures; it does not address the appropriate substantive power-system parameters, reserve requirements or market-design choices.

I focus on *the lifecycle states, responsibility, traceability and verification of the proposed procedures*. The comments below ask only for the smallest missing transition, record or decision rule; they propose no new registers, appeal rights or substantive technical requirements.

Summary

Two principal questions follow, in order of importance:

1. **fos § 14a:** separate a facility-data value's current-use status from its origin and licensee-response status, so that the record preserves how a value became current.
2. **Vilkår for FCR, art. 7a:** clarify how the new Norwegian flexibility-group category maps onto the flexible-prequalification and flexible-operation provisions of the incorporated Nordic technical requirements.

A short NVF evidence-mapping question and additional transition and drafting clarifications follow.

1. fos § 14a — preserve current-use status separately from origin and licensee-response status

The proposed text in the [consulted system-responsibility guidelines](#), in the "Frister" (deadlines) provision, says that when Statnett as *systemansvarlig* (the system operator) corrects facility data (*anleggsdata*) in Fosweb and informs the licensee (*konsesjonær*) of what was corrected and why, the licensee has ten working days to make changes to the corrected data; if no changes are made within ten working days of Statnett's notification, "vil data ansees som gjeldene [sic]" (the data will be treated as current in Fosweb). The background adds: "Konsesjonær er fremdeles ansvarlig for at dataene er korrekte" — the licensee remains responsible for the correctness of the data.

The guideline also states that Statnett will make such changes in consultation with the reporting licensee or owner.

The central observation is a provenance question, not a challenge to Statnett's need to operate on one value:

A value may be current for Statnett's operational use without having been expressly affirmed as correct by the licensee. The guideline should preserve the value's origin and the licensee's response state.

Statnett may reasonably maintain that the licensee remains responsible for facility data derived from its plant and documentation, even where Statnett performs the technical correction. Responsibility can remain with the licensee; the point is that the record should distinguish a value expressly affirmed as correct by the licensee from a value that became current through expiry of the response period. The guideline does not state how that distinction is represented or retained for later correction and supervisory follow-up.

The minimum clarification preserves the operational shortcut without prescribing Fosweb's schema: for each corrected value, record:

- the value currently used by Statnett;
- the provenance of the current value — licensee-submitted, licensee-amended following notification, or Statnett-corrected;
- the licensee's response — affirmed as correct, contested, amended, or no response by the deadline;
- notification and effective timestamps, including the start of the ten-day period;
- supersession history, or an explicit statement that the existing Fosweb audit history provides equivalent traceability.

These are minimum semantics, not a database or interface design. If Fosweb already maintains some or all of this, stating it in the guideline would close the same question.

A secondary point: the proposed text states that the processing time for new facilities starts when the case is reported and made ready for Statnett's quality assurance ("klargjort for kvalitetssikring hos systemansvarlig"). This is Statnett's processing clock. Please state whether and how the licensee is notified when the case enters the "ready for quality assurance" state, so that both parties can verify the start of the stated processing period.

2. Vilkår for FCR, art. 7a — map the flexibility group onto the Nordic flexible-prequalification machinery

A flexibility group (*fleksibilitetsgruppe*) is itself a regulating object (*reguleringsobjekt*) and "skal prekvalifiseres samlet" — shall be prequalified collectively (art. 7a nr. 4). The [consulted FCR market terms](#) incorporate Nordic FCR requirements (art. 5 nr. 2 b, referencing "Tekniske krav til FCR i Norden"). Sections 3.11.1–3.11.3 of the [Technical Requirements for Frequency Containment Reserve Provision in the Nordic Synchronous Area](#) (Version 1.1, dated 28 March 2025) distinguish flexible prequalification (resources enter or leave the group after initial prequalification) from flexible operation (the subset of group members participating during operation changes); the two may be combined. Section 3.11.3 separately covers removal through flexible operation, free removal of units added through flexible prequalification, removal through "reversed" flexible prequalification, and removal of type-qualified units, with prior TSO notification when group capacity is affected. In the prequalification application, the provider states the intended flexibility; the

reserve-connecting TSO approves it and may set limits. Changes outside those limits require a new prequalification, while flexible prequalification does not extend the original validity date.

The Norwegian terms under consultation introduce the flexibility group as a new category but do not themselves explain how this Nordic flexibility machinery applies to it. Art. 5 incorporates the Nordic requirements; art. 7a does not state the mapping:

Please cross-reference sections 3.11.1–3.11.3 of the Nordic technical requirements and clarify how their flexible-prequalification, flexible-operation and unit-removal provisions attach to an Article 7a flexibility group, including the treatment of a proposed composition change outside the approved flexibility limits and the relationship between collective, subgroup and individual prequalification evidence.

- In the Article 7a application process, where should the provider state whether it seeks flexible prequalification, flexible operation, or both, and how is the resulting approval linked to the flexibility-group record?
- Where are the approved flexibility limits recorded for an Article 7a flexibility group, and how are they linked to the group composition to which the approval applies?
- How are individual or smaller-group prequalifications accepted under art. 7a nr. 4 linked to the qualification of the collective regulating object?
- For a planned composition change outside the approved flexibility limits, may the previously approved group composition continue to deliver unchanged while the new prequalification is pending? If a unit instead becomes unavailable or must be removed, how do sections 3.11.2–3.11.3 apply to the Article 7a flexibility group, including any notification and minimum-capacity consequences?
- What happens when a membership change causes the group to fall below 1 MW or exceed 5 MW (art. 7a nr. 2 e), independently of the Nordic flexibility limits?

Two related drafting clarifications in the same article family: art. 5 nr. 2 c refers to assignment to a "stasjonsgruppe" (station group) as described in artikkel 6, while the actual assignment rules appear in art. 7 (art. 6 covers aggregation and directs the reader to art. 7); a direct art. 7 reference would be clearer. And art. 7a nr. 1 and nr. 2 c state the 1 MW condition in two forms — resources at each metering point, and the aggregate behind one metering point — which may be cumulative; please add a clarifying sentence stating whether both conditions apply.

3. NVF kap. 10 — map the new consumption-facility requirements onto the existing evidence surfaces

The [consulted NVF amendments](#) establish fault ride-through (FRT) and post-fault active power recovery (PFAPR) requirements (10.3.2.1, for consumption facilities with $P_{maks} \geq 30$ MW or connected to a network with $U_n \geq 110$ kV), a general stability requirement (10.5.1), and active-power regulation and ramping requirements (10.6.1), with a needs-assessment provision for facilities with $P_{maks} \geq 30$ MW in 10.6.2. These are newly proposed requirements for consumption facilities, but the evidence architecture is not: the current [fos §](#)

[14 guideline](#) already requires the applicant to confirm whether the NVF functional requirements are followed and, where a requirement is not followed, to identify the requirement and justify the reason, and the resulting decision may impose conditions; the current [fos § 14a parameter list](#), effective from 1 January 2026, already requires consumption facilities to submit, among other things, a specification of control functionality, a commissioning report for that functionality, a dynamic analysis or study, an annual load profile, a normal switching arrangement showing how consumption is distributed within the station and a PQ profile for different load situations.

The issue is which existing artifact or combination of artifacts is intended to demonstrate each requirement:

- Is compliance with the FRT curve and the one-second PFAPR requirement demonstrated through the existing dynamic study, a dedicated simulation, an expanded commissioning report or another artifact?
- Does the existing control-functionality commissioning report cover the new ramp-rate functionality?
- What evidence demonstrates the general stability requirement?
- The generic fos § 14 application route appears to cover an inability to meet the FRT curve itself; please confirm this and cross-reference that route expressly in NVF chapter 10.

I therefore ask that the amendments identify, for each requirement, the applicable fos § 14 application or decision step and the fos § 14a documentation artifact or combination of artifacts intended to demonstrate compliance with NVF 10.3.2.1, 10.5.1 and 10.6.1, and update the parameter list or applicable cross-reference where the current documentation does not cover a requirement. This asks only for requirement-to-evidence mapping, not new test standards, verification chapters or data-retention obligations.

4. Additional transition and drafting clarifications

- **NVF 10.3.2.1, "Med mindre det ikke er besluttet noe annet":** the double negative inverts the intended default under a strict reading. The single-negative convention used elsewhere in the same document (e.g. 10.4.1.3: "Dersom ikke annet er besluttet av systemansvarlig") indicates the intended meaning is "unless Statnett decides otherwise". Please confirm the intended default and correct the phrasing.
- **Version and transition binding:** Article 10 nr. 9 requires compliance with the technical specifications for the FCR market as updated from time to time, while Article 5 nr. 2 b incorporates the Nordic technical requirements without identifying a version. Where a change in either source affects an existing prequalification, please identify the applicable effective date, transition treatment and reassessment trigger. This is not a request for a freeze of the requirements.
- **fos § 12 second paragraph:** the second of the two proposed bullets contains an unmatched parenthesis (" (ref. fos §8b tredje ledd) med mer enn 100 MW") that should be corrected.
- **fos § 14a, "Frister":** "gjeldene" should read "gjeldende".

- **Consultation deadline:** the [consultation webpage](#) gives the deadline for this part of the consultation as 15 August 2026, while the PDF's submission paragraph states 15 August 2025. I have proceeded on the webpage date. Please correct the PDF.