

Minutes of Meeting Drafting Team Network Code on Requirements for Generators EUR

Date: 10 November 2011

Time: 10h00 – 13h00

Place: Elexon, London

Participants:

Name	Affiliation
DT RfG	
Luis Coronado	REE
Anders Danell	Svenska Kraftnät
Amir Daresoph	National Grid
Peter Freitag	Amprion / LRG
Edwin Haesen	ENTSO-E
Sergio Martinez Villanueva	REE
Mark Norton	EirGrid
Ramūnas Ponešis	Litgrid
Ralph Pfeiffer	Amprion
Thibault Prevost	RTE
Jerzy Rychlak	PSE
Helge Urdal	National Grid
Mario Valente	Terna
EUR	
Jonas Persson	Vattenfall, Sweden (chair EUR WG RfG)
Francois Luciani	EDF Energy, UK
Jukka Päiväranta	Fortum, Finland
Andreas Menze	E.ON, Germany

DT RfG: ENTSO-E Drafting Team on the Network Code on Connection Requirements applicable to all Generators.

EUR: European Utility Requirements for LWR nuclear power plants

1. Welcome, attendance, adoption of the draft agenda

Proposed agenda

- Status and next steps network code development
- Most relevant requirements/evolutions in latest working draft publication
- Key comments EUR and discussion
- AOB
- Next steps

The agenda is approved.

2. Status and next steps Network Code development

Presentation prepared by the DT (*111110 - DT RfG – EUR.pdf*)

EUR asks if other working drafts will be published. This will most likely not occur before the public consultation starts (end of January 2012)

3. Most relevant requirements/evolutions in latest working draft publication

Topics discussed based on the presentation:

Retro-active application

The DT states that the presented process is the best possible interpretation of ACER's framework guidelines.

EUR asks who performs the CBA. The TSO performs the CBA while the user is required to assist in it.

EUR mentions the high burden retro-active application could impose on small independent power suppliers (resulting in a market barrier). The DT clarifies that the code does not state who bears the costs. The global socio-economic optimal approach is taken as requested by ACER's framework guidelines.

EUR asks if TSOs expect that most existing units do not need to comply. The DT clarifies that retro-activity can be decided upon per requirement. For many requirements and many units retro-activity will not be justifiable by a CBA and not be pursued. It is noted that due to changing conditions a TSO can decide to pursue retro-activity at a future stage.

EUR agrees that retro-active application should not be pursued for all units and requirements and supports the idea of a case by case analysis. EUR asks how they can support this idea. The best way to support this approach is by commenting accordingly in the public consultation. The DT states that a support of the ENTSO-E interpretation of retroactivity would be highly welcomed.

EUR asks if it will not be considered discriminatory that requirements differ for old and new units. The DT states that the code is forward looking. It is important that mistakes from the past should not be repeated with respect to e.g. PV frequency tripping settings.

Units under construction

The code provides a specific clause to clarify if units under construction are to be considered New or Existing Units. EUR points out that long timeframes need to be

considered when building nuclear plants. The time delay between design and building may be several years. Whether requirements can be met (e.g. static/rotating exciter for FRT requirements) are decided in the design phase. A manufacturer needs a clear picture on what needs to be fulfilled at an early design phase. ENTSO-E acknowledges this situation but underlines there should be a financial commitment at that stage in order to be considered an Existing Unit. The DT will consider the comment. Note: this problem occurs only at the entry into force of the code when determining the existing units at that point in time.

If upgrades/refurbishments are performed at the generator's decision, the unit needs to comply with the relevant requirements. When spare parts are available, the code allows for using it under prescribed conditions.

Relation of the network code with national legislation

Network code requirements do not have to be taken over in national legislation, because they are applicable immediately, if the code is implemented by means of a regulation. In any case the framework guideline states that network codes will supersede national codes, standards, etc... The situation is further elaborated in an FAQ (updated version of the July 2011 document; to be published in January 2012).

EUR states there is a need for more insight in differences between network codes and national codes.

4. Key comments EUR and discussion

EUR prepared two presentations:

- a. Organization / EUR reference document
- b. First analysis by the EUR Working Group on the impact of the generator code

The EUR working group consists of five members (of which four are present). A draft position paper (16/09/2011) on the pilot code is distributed to the DT members. A detailed analysis is still to be started. It is decided that the EUR position paper will be a public document.

The position paper mentions that the draft code is not aligned with ACER's guidelines. This is true for the pilot code of March 2011 since the final framework guidelines were not available at that moment. The DT aligned the code with the ACER framework guidelines in its recent working draft. EUR agrees this needs to be re-analyzed.

The network code does not mention nuclear safety which is a key concern by EUR. The DT acknowledges the safety issues nuclear plants need to deal with. Also for TSOs security and safety issues are very important. It is nevertheless difficult to quantify safety in a CBA, so setting specific figures would inevitably invoke reactions.

The DT points out that operational topics will be part of network codes on System Operation. A first network code on Operational Security is to be submitted to ACER end of 2012. A final framework guideline is expected by the end of 2011.

EUR states that frequency requirements for hydro and nuclear need to be different as it already is in some countries. The DT argues that was due to past market situations. Now the European network codes envisage a system perspective and equitable treatment. The fact that nuclear plants are mostly of a high capacity compared to other plants is taken into account by the categorization in four types of generation.

EUR is concerned that reactive power requirements appear to be wider than existing national codes. The DT explains the rationale behind the envelopes in the requirements. The envelopes constrain TSOs as well. Also for defining a specific reactive power capability curve by a TSO the present draft requires NRA approval or a transparent consultation process. It should be pointed out that the box of reactive power cannot be larger than in Figure 6 in ENTSO-E NC.

EUR believes frequency and voltage ranges, within which disconnection is prohibited, should be considered coupled. The DT clarifies that both requirements in the network code are to be superposed. The DT will draft an FAQ to illustrate this interpretation more clearly.

EUR asks why no frequency of occurrence of events out of these ranges is mentioned in the code. The DT states this should be up to the judgment and economic optimization of the plant owner. No TSO can give future trends for these extreme events, because they are unpredictable and often triggered by force majeure. It is also not likely that network codes on system operation will give more requirements for information on this.

5. AOB and next steps

EUR will list comments on the most recent working draft document and send it to the DT mid-December.

EUR will point out where “requirements are defined using equipment design details of the plants”, i.e., EUR will add more examples of this since EUR believes that too detailed requirements are not beneficial for evolution in technology.

On-site testing may cause stress to nuclear plants especially when the test significantly deviates from normal operation: Factory tests should therefore be indicated. ENTSO-E commented that factory tests are already included in the NC and that big units should not be tested more than necessary for demonstrating compliance.

A template for providing comments (similar to the one used for the pilot code consultation) will be sent to EUR.

ENTSO-E is interested to solve the issues stated by EUR before the Public Consultation Process.

The EUR Working Group will gather material and send suggestions of changes to EUR. It should in the material be stated:

1. What paragraph should be changed?
2. Why it is a concern.
3. How it should be changed.

EUR requests a follow-up meeting on this. The DT argues that the drafting for a version to go into public consultation is in its final stage. Several stakeholder meetings are planned for December/January. It is noted that some EUR members were already involved in discussions with DT through other associations. All stakeholders need to be involved in an equitable way taking limited time and resources into account.

The DT will send a comparison document showing the changes between the March 2011 and the October 2011 version to facilitate the update of EUR's position paper.