

Minutes of Meeting ENTSO-E Drafting Team on RfG EPIA

Date: 09 January 2012

Time: 14h00 – 17h00

Place: Madrid

Participants

Name	Affiliation
<i>DT RfG</i>	
Hans Abele	ENBW
Luis Coronado	REE
Anders Danell	SVK
Torsten Haase	50Hz
Edwin Haesen	ENTSO-E
Jako Kilter	Elering
Sergio Martinez Villanueva	REE
Ramūnas Ponešis	Litgrid
Ralph Pfeiffer	Amprion
Thibault Prevost	RTE
Helge Urdal	National Grid
Mario Valente	Terna
<i>EPIA</i>	
Bernd Engel	SMA
Martin Heidl	Fronius
Manoël Rekinger	EPIA
Alexandre Roesch	EPIA
Thomas Schaupp	Kaco
Tomas Lopez	Jema

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

1. Welcome, attendance, adoption of the draft agenda

Proposed agenda topics, agreed on by ENTSO-E and EPIA are

- Status and next steps in the network code development
- Changes in the most recent working draft version (27/10/2011) compared to the pilot code (23/03/2011) and feedback from EPIA
- Technical requirements for PV systems (economic feasibility of some requirements, links with standards and national codes)
- Scope (definition of types in relation to the voltage level, cost-benefit analysis conducted for the application of requirements to existing generators)
- Compliance process and derogations

EPIA asks for clarification on the time period of the public consultation and the procedure followed

- The public consultation on this network code is planned to start the last week of January 2012, for a period of eight weeks (most likely 24.01.12 – 20.03.12).

- Assessment of all comments will be done by ENTSO-E. Comments and their assessments will all be published afterwards.
- A public stakeholder workshop is planned for 15.02.12.
- Stakeholder interaction after consultation will continue by means of stakeholder user group meetings. More information on this will follow.

The DT clarifies that the internal approval procedure for the code to enter public consultation is already ongoing. This meeting is seen as an opportunity to share concerns on the draft code; however changes cannot be included in the draft code before consultation anymore, because of the ongoing ENTSO-E approval procedures. Therefore, EPIA is requested to submit comments to be discussed with the DT in this meeting again during the public consultation phase.

EPIA agrees to have mutually agreed minutes of this meeting which will be published by ENTSO-E at a later stage.

2. EPIA's views on RfG

A presentation with EPIA's views on the draft code (dated 27/10/2011) is prepared and distributed (*120109 - EPIA presentation.pdf*). The main discussion topics are given below.

Scope:

EPIA proposes to use either type classification based on present CENELEC standardization, which refers explicitly to LV and MV connection level, or to us classification for type B with a 1MW threshold. The latter would result in type B units being most definitely MV connected as well, thus reflecting the current typical differentiation between generating units.

EPIA states that determining thresholds on national level with EU-wide harmonized maximum values only does not give sufficient confidence to manufacturers on eventual implementation of this throughout Europe. The DT notes that ACER's framework guidelines request a determination of significant users on national level. Setting a maximum lower threshold is considered the best compromise.

EPIA asks if a type A plant can become a type C in the future. As the plant would already be built, this question refers to discussions on retrospective application of requirements in the code and its related procedures. The DT notes that not only the threshold itself is of relevance, but also functionalities assigned to each type of unit. The next draft code set for public consultation will likely reflect changes in this as well. The DT considers overlaps of categories are not possible anyway.

EPIA proposes to introduce a minimum lower threshold value as well to give confidence on manufacturers on future evolutions. The DT notes that NRA will need to take public opinion into account anyway when lower thresholds are proposed.

EPIA notes that the code refers often to bilateral agreements and consultations and prefers a simple reference to a standardization process instead of having the risk to have numerous discussions with individual small DSOs and not guaranteeing a harmonized approach to mass products. In today's practice manufacturers can refer to national standards in discussions with DSOs. The latest ENTSO-E draft appears to take this away. The DT notes that harmonization is no objective in itself; sometimes even diversity is more relevant from a system security perspective. Cost efficiency through harmonization is however acknowledged as a benefit in the code and the FAQs.

EPIA asks for TSO support on relevance of standardization with respect to network codes.

EPIA strongly supports the approach on retro-activity in the latest version of the RfG draft. However, EPIA considers that more clarity should be provided on the Cost-Benefit Analysis (CBA), its parameters and its impact on retrofitting requirements. EPIA proposed that, in case of retrofitting, who receives the benefits of this also pays the cost. The DT argues that the overall socio-economic benefit is envisaged in the code and costs shall borne by the real originator according to the ACER FWGL.

Technical requirements:

EPIA considers the requirements on reactive power provisions to be disproportionate for new single phased and existing Type A and B units. Cost simulations on new and existing units have been performed to illustrate this. The DT considers the figures on existing units to be of relevance only in case retro-active application would be pursued which is not the TSO's intention. EPIA proposes a derogation in the code for single phase <16A installations on reactive power provisions, for both new and existing installations. The DT argues to not provide derogations in the code itself.

Both the DT and EPIA agree that standards can complement network codes, e.g. in defining reactive power capabilities of small units. A network code sets up a legal framework to be considered when developing standards in future.

EPIA asks for clarification why reactive power capabilities of Type A Power Park Modules are considered a cross border issue. The DT states that this indirectly supports the system security.

EPIA states that just requiring an I/O port now for new units for remote switching on/off will result in adaptations or additional modules later on when it is decided how to implement the communication path. The DT argues this should indeed be as low cost as possible and based on early standardization efforts.

EPIA considers the lower threshold limit of 400W to provide several services and especially the remote switching on/off capability by all units being too low from a system perspective and proposes to exempt the smallest units by introducing a minimum capacity size from which on the code shall apply, for example as defined in Germany (30 kW). The DT argues that mistakes from the past shall not be repeated and refers to a similar decision taken on early PV installations where frequency tripping for a small number of units was not considered a problem.

EPIA asks how variable sources are dealt with for specific services. The DT clarifies that requirements in this draft code are design requirements and will/can not be provided at any time, but only if conditions allow for operation of variable source dependent units. EPIA then proposes to exclude e.g. black start capability for variable sources. The DT states that TSOs set requirements reasonably and in line with an upfront clause in the code of general principles on how to fairly implement decisions.

Compliance procedures

EPIA welcomes the type testing approach for type A and B.

EPIA however questions the certificate registration procedure as defined by the code. The DT clarifies that registration literally means receiving and archiving certificates, it does not involve setting criteria. The DT will clarify this in a future version of the code. EPIA agrees on this interpretation. The DT points out, that certificates are considered to be issued by authorized certifiers. Manufacturer self-certification shall be excluded. EPIA is in favor of self-certification and claims that this position is in contradiction with the Directive 2006/95 (EC), which establishes manufacturer self-certification for LV installations. The DT will check this Directive from a legal view for consistency of the code.

EPIA asks what the added value of compliance simulations is. The DT argues that these are needed for demonstrating compliance with requirements that cannot be tested in practice and are furthermore needed for model verification to be used for network studies.

Adaptation of the code over time

EPIA considers that more clarity should be given in the code itself about the revision process that will be applicable. The DT clarified that the revision of the network code will follow the procedure described in Art.7 of the 714/2009 Regulation.

3. ENTSO-E status on RfG

A presentation is prepared by ENTSO-E on the timeline of the RfG development and some of the frequently asked questions in the context of this code (*120109 - DT RfG – EPIA.pdf*).



End of meeting