

# GC ESC - COGEN Europe's Contribution

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**COGEN**

EUROPE The European Association  
for the Promotion of Cogeneration

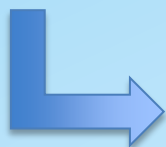
# NC RfG Implementation – Emerging Technology Classification

# ETC Implementation

## Application procedure

Original recommendations by COGEN Europe:

- Common Synchronous Area guidelines to apply for “emerging technology” status based on the initial UK/French guidelines with co-ordination support from ACER  
→ Efficiency gains for both manufacturers and NRAs



### Outcome:

- Good effort by ACER for a more centralised & co-ordinated approach to the ETC application process
- But most NRAs did not follow the recommended route
- This led to significant extra work and lack of clarity on how the manufactures should proceed against a tight deadline
- Due to the different approaches taken by NRAs, there are concerns regarding inconsistencies between countries in the upcoming assessment of applications

# ETC Implementation

## Examples

### Contact info & Guidelines

- Several countries provided ACER with contact information 1-2 days before the deadline
- Some countries never notified ACER with contact info & guidance note, although they were available (e.g. Poland)
- Back up option used: general contact info on CEER website
- Different body than the NRA responsible for the ETC implementation (e.g. in Italy)

### Languages

- Some countries accepted applications in both English and the official language (NL, BE)
- Other countries insisted on applications and supporting documents being provided in their official language (DE, AT, PL), which was in some cases unfeasible by the deadline (e.g. PL)

### Eligible applicants

- Different understanding/expectations of who should apply for ETC  
→ The German BundesNetzAgentur indicated that a single application by the engine manufacturer would have been sufficient than 7 different applications by manufacturers with products based on the same engine / this was originally included by COGEN Europe request but rejected by the SO/TSO during a NC RfG Stakeholder meeting

# ETC Implementation

## Examples

Documentation  
required

- Additional documentation and questions asked by several agencies, beyond the evidence required in the NC RfG text
- More proof of commercial availability, besides sales estimates and prices, also safety, health, environmental and technology standards have to be fulfilled in order to be allowed to sell in Germany - Luckily the deadline for extra information was extended to 14 Dec

### Recommendation:

- NRAs should confirm receipt of applications and follow-up in case there are further questions
- NRAs to allow an open period after the deadline for applicants to respond to any follow-up questions

# ETC Implementation

## Recommendations

- The inconsistencies in the application procedures among different NRAs raise concerns regarding the assessment process → How comparable will the outcomes be, if different criteria are applied?



### Recommendation:

- Apply the suggested approach in Art 69.1 which implies NRAs taking a decision on the list of ETC eligible technologies in a **co-ordinated way & with the prior opinion of ACER**
- Principles to apply in the assessment:
  - Ensure there's flexibility regarding the eligibility of different variants of the same technology (e.g. 1-2 kWe Stirling engine based micro-CHP)
  - Provide clear guidelines, consistent across the different countries, on the party(ies) eligible/responsible under the ETC → in the case of Stirling micro-CHP either MEC or the individual product manufacturers would be able to report on country level sales



# ETC Implementation

## Recommendations

- 0.1% threshold defined at Synchronous Area Level, but applied at national level proportionally to the maximum load in each country



### Recommendation:

- Depending on how Title VI implementation advances, there may be scope to open a discussion on applying the 0.1% threshold at Synchronous Area (SA) level and reallocation of thresholds within a SA

# Thank you for your attention!

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