

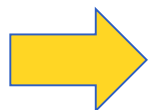
Electricity Network Codes and Guidelines

Grid Connection European Stakeholder Committee (GC ESC)

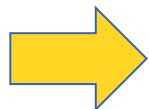
9 December 2016

* The explanations provided in the slides have been developed at service-level and cannot be construed as representing the formal view of the Commission.

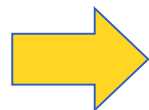
1. Can a Member State impose more stringent requirements by a separate legislation than imposed by the network code Requirements for Generators (RfG NC)?



In general, no – not outside of the values provided for in the code.

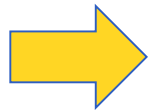


But: "the relevant system operator, in coordination with the relevant TSO, and the power-generating facility owner may agree on wider frequency ranges, longer minimum times for operation or specific requirements for combined frequency and voltage deviations to ensure the best use of the technical capabilities of a power-generating module, if it is required to preserve or to restore system security." Article 13.

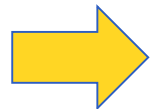


"The network codes shall be developed for cross-border network issues and market integration issues and shall be without prejudice to the Member States' right to establish national network codes which do not affect cross-border trade." Article 8, Regulation 714.

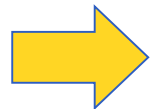
2. May a European Standard impose more stringent requirements than imposed by NC RfG and may member states use such a standard?



As provided in response to Question 1, in general no – not outside of the values provided for in the code. See also Article 13 RfG and Article 8 of Regulation 714.

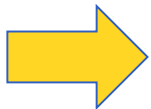


Article 7(3) requires Member States, competent entities and system operators, when applying this Regulation, to "*take into consideration agreed European standards and technical specifications.*" Hence, if European Standards impose more stringent requirements outside the values provided for in the code, this would allow Member States circumvent this limitation.

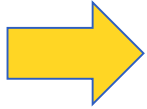


Note that ACER Framework Guidelines are non-binding.

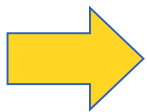
3. What is the meaning of "substantial modification" in Article 4(1)(a) RfG?



RfG does not define what is to be understood by "substantial modification".

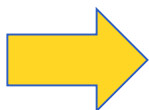


However, Article 4(1)(a) specifies that it should be a modification affecting the technical capabilities of a type C or D PGM that requires a substantial revision of its connection agreement, in accordance with the procedure set out in the Regulation.

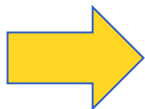


The procedure is set out in subparagraphs (i) to (iii) of Article 4(1)(a) and entails a decision of the regulatory authority or Member State on a case by case basis as to whether *"the existing connection agreement needs to be revised or a new connection agreement is required and which requirements of the Regulation shall apply"*. Hence, it is ultimately for the regulatory authority or Member State to determine whether the modernisation of a plant or the replacement of equipment impacting the technical capabilities of the PGM entails a "substantial modification".

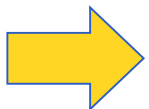
4. How should Article 15(1)(f) DCC be understood?



The term "connection point" is defined in RfG.

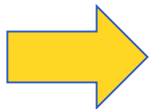


In the event that a generator is connected to a DSO, the generator becomes part of the distribution system, i.e. the network and the users connected to it. This system will be connected to the TSO network at the connection point via a connection agreement and therefore the generator will have a connection point to the distribution system (and not the transmission system). However the distribution system will have a connection point to the transmission system, and it will be required to ensure its system (network and users in totality) complies with the requirements at the connection point.

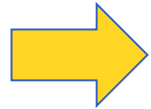


Article 15(1)(f) is therefore applicable to all connection points between the distribution and transmission systems.

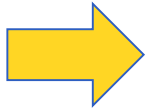
5. How should Article 15(2) DCC be understood?



Article 15.2 refers to the terms "maximum import capability" only.

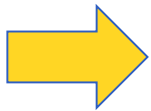


Article 15.1.b refers to both "maximum import capability" and "maximum export capability".



Article 15.1.b and Article 15.2 set two different types of obligations which cannot be interpreted together.

6. How should Article 27 DCC be understood?



Article 27 refers to different demand response services that can be provided to the system operators. According to Article 27, smart charging solutions for Electric Vehicles could be considered as demand response services if they comply with the provisions in Article 28(2) or Article 29(2).