Minutes of Meeting
Drafting Team on RfG (DT RfG)
DSO Technical Expert Group (DSO TEG)

Date: 7 December 2012
Time: 9h00 – 12h00
Place: Düsseldorf airport

Participants

Name	Affiliation	present	excused
DT RfG			
Hans Abele	ENBW	X	
Luis Coronado	REE	X	
Anders Danell	SVK		X
Torsten Haase	50Hz		X
Edwin Haesen	ENTSO-E	X	
Jako Kilter	Elering	X	
Sergio Martinez Villanueva	REE	X	
Mark Norton	EirGrid		X
Ramūnas Ponelis	Litgrid	X	
Ralph Pfeiffer	Amprion	X	
Thibault Prevost	RTE	X	
Jerzy Rychlak	PSE	X	
Helge Urdal	National Grid	X	
Mario Valente	Terna	X	
Wilhelm Winter	Tennet		X
DSO TEG			
Alberto Ceretti	Enel Distribuzione (Eurelectric)		X
Falk Engelmann	VKU (CEDEC)		X
Bruno Gouverneur	Synergrid (Eurelectric)	X	
Mike Kay	ENWL (Geode)		X
Tony Hearne	ESB Networks (Eurelectric)		X
Riccardo Lama	Enel Distribuzione (Eurelectric)	X	
Johan Lundqvist	Svenskenergi (Geode)	X	
Marc Malbrancke	Inter-Regies (CEDEC)	X	
Pavla Mandatova	Eurelectric	X	
Jacques Merley	ERDF (Eurelectric)	X	
Sylvia Michel	Svenskenergi (Geode)		X
Herman Poelman	Alliander (CEDEC)	X	
Graeme Vincent	Scottish Power (Eurelectric)	X	
Walter Schaffer	Salzburgnetz (CEDEC)		X
Pierre Schlosser	Eurelectric		X
Siegfried Wanzek	E.ON-Energie (Eurelectric)	X	

1. Welcome, attendance, adoption of the draft agenda

Proposed agenda is presented in a prepared presentation. Main topics are timing of the NC RfG process and clarification on FAQs.
The agenda is approved.

The DT announces that the agreed minutes of the meeting will be published, since ENTSO-E has to register stakeholders meetings and make related documents public.

The DSO TEG states that only a few DSO suggestions expressed during the August meeting have been included in last version of NC. The current version of the NC includes improvements in the retroactive application but no improvements on the concerns raised in August. The DSO TEG expected substantial improvement of the structure of the NC (lighter document, including only requirements which they consider to be related to cross border issue, security of supply, etc) The DSO TEG states t that in order to comply with the goals of the Third Energy Package, to deal efficiently with issues affecting cross-border trade, the EU network code for grid connection of generators should exclusively focus on issues that are directly cross-border ones. Cross-border impact of small generators connected to distribution networks is limited to frequency management. Hence, substantial reduction of requirements for small generators and to certain extent also medium size plants is proposed. Since the NC is too detailed, the DSO TEG expects a negative impact on future connection on the DSO network.

The DT argues that taking into consideration some comments does not mean acceptance. Some comments were not integrated in the code as the DT does not share the DSO TEG definition of cross border issue

The DSO TEG argues that no new comments were provided by the DSOs in the meanwhile since ENTSO-E DT did not comment on their written statement shared before previous meeting and their remarks did not change from those given during the August 22nd meeting. At that moment (20/09) there was no new draft NC RfG, so it was impossible to judge what ENTSO-E was taking into account and what not. Only after the publication of the new draft on the ENTSO-E website on October 27th the DSOs were able to evaluate the effect of their August 22nd remarks.

In July 2011 ENTSO-E sent a letter to the EC on the topic of frequency tripping of PV installations at 50.2Hz with support of the German PV industry. The DSO TEG noted that DSOs were not involved in this initiative that has direct impact on their grids.

As mentioned above, the DSO TEG agrees that frequency issues have a cross-border impact and that frequency ranges should be analyzed and possibly be widened. However, the DSO TEG states that the present code requirements can result in distribution operation problems in some countries. E.g. by requiring wider frequency ranges for small scale generation, a higher phase shift could exist over the main switch after auto-reclosure (e.g. after 600msec) and during further reclosing operation due to MV network automation system.

A problem in the present distribution operation is that DSOs nowadays often have no legal right to control (shed) generation or operate reactive power operation.

The DSO TEG believes ENTSO-E's interpretation of a cross border issue for the purposes of this network code is too wide. DSO view focusing on the technical aspects of the term was presented in first instance at the recent Florence Forum. (In the meanwhile, DSO position paper with all arguments presented in discussions was published - for details see Annex 1.)

The DT argues that the code in many cases provides flexibility to DSOs to impose or further specify requirements, e.g. on voltage stability requirements for type A units[1].

The DSO TEG has a concern on possible conflicts with national laws.

- The DSO TEG wishes to see this clause deleted and sees no added value to have it in a European NC.

[1] Working draft document published 02 Nov. 2012: *"With regard to voltage ranges a Generating Unit shall be capable of automatic disconnection of the Generating Unit at specified voltages, if required by the Relevant Network Operator. The terms and settings for automatic disconnection shall be set by the Relevant Network Operator, under the conditions and within the existing national framework, and respecting the principles of transparency, publicity and non-discrimination. "*

The DSO TEG agrees with a graded approach on significance and the fact that a categorization of users is the best way to deal with the significance issue. But as the cross-border impact and thus significance of the various system parameters varies in respect to generation types, the DSO TEG underlines that requirements for types A and B should focus on directly cross-border issues and thus be substantially reduced, namely to the frequency issue (for details see Annex 1).

The DT argues that a requirement for a type of user is only justified in the NC if it can have a cross-border impact.

The DSO TEG does not disagree that voltage problems on DSO level can result in wide scale voltage collapse. It has primary to do with the lack of production in the same region as demand or it is the result of a weak transmission network and it considers that such wide scale collapses should not occur with an appropriate defense strategy at the TSO level. A wide scale collapse is therefore a possible consequence of a failed defense strategy. However, there is no European-wide voltage common mode.

The DSO TEG agrees that the approach of the DT on retro-active application is the best approach that is allowed within ACER's framework guidelines. The DT stresses that it is important that all stakeholders support this position explicitly.

The DSO TEG expresses several concerns in the context of the presented CBA for retro-active application and proposal for compliance:

- Any new requirements should be justified by CBA (not only retro-activity), as required by the ACER FG. DSO TEG has questions on the relation between DSO/generator requirements and TSO capital expenditures thus shifting burdens in the system which are not dealt with in this NC.
- The related costs for DSOs (especially administrative costs) have to be taken in consideration
- The negative experience with self-certification (CE marking deals with safety and hazards, not with performances) (a general remark on compliance testing and monitoring); a certification by a third party is favored, cfr. present practice according to ISO standard.
- A comparison with alternative solutions for retro-active fitting was expected → The DT points out that stakeholders have the opportunity to identify these if needed in the public consultation of the retro-activity request. The NRA who has the final decision can as such compare different options.

End of meeting

Proposals formulated by the DT RfG in response to this discussion:

- Shift or reformulation of some type A/B requirements
- Clarification on certification (MD&TPC definition) by accredited bodies

Annex 1 – Draft Network Code "Requirements for Generators". Eurelectric DSO Position, published with support of CEDEC & GEODE