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# ENTSO-E NC RfG version 12/06/2012: some reflections from the wind industry

Frans Van Hulle, Paul Wilczek  
EWEA

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# NC does not yet fulfil all requirements



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- Wind industry looks forward to a well accomplished **future** version of the NC as a big opportunity for grid code harmonisation all over Europe.
- EWEA welcomes that several of its comments have been incorporated into the latest draft NC RfG (including last minute). However, input of the wind industry is still not yet sufficiently integrated in this version.
- Partly due to the tight timelines that have to be met by ENTSO-E, but also:
  - several requirements are not acceptable for EWEA as written in the June 12 version;
  - these include a number of fundamental changes made since the public consultation.

**Even June 2012 version would need additional consultation**

## Examples of issues with last minute changes (12/06)

- Article 15 2.b) 2): *providing at least 2/3 of additional reactive current within time not less than 10 ms* : where is this coming from?
- Article 4(3): At last minute this article is completely rewritten (+misprint in the reference). NRA role should be clarified.
- Leaving a number of disputed points open for national grid operators to decide, together with the change in Article 4(3) holds the risk that national TSO's impose costly or technically impossible requirements on generators while avoiding cost benefit analysis.
  - e.g. Q compensation capability during normal operation, time for Active Power recovery; 0.85 p.u. voltage recovery after fault clearance

There has been insufficient time for balanced response & discussions

- Unrealistically short timetable for ENTSO-E for this challenging task
- Process of fundamental NC structure creation carried out much in isolation >> result : very poor stakeholder acceptance (>6000 comments)
- FG still not fulfilled (no CB analysis for new/extended requirements)
- NC RfG provided for consultation in isolation from other NC's with which it interacts (OS/balancing)

# Conclusion

- Looking at process and NC contents, many remarks remain;
- Too short timeline for enabling a thorough NC creation joint ENTSO-E/stakeholders process;
- EWEA as one of the main concerned stakeholders is still sceptical about the consequences of implementing the present version NC with regards to facilitating the targets for penetration of renewable generation.