

Günther Oettinger
European Commissioner for Energy
European Commission
B – 1049 Brussels

Brussels, 30 August 2011

Subject: reaction to the ENTSO-E letter on automatic frequency disconnection settings of installed photovoltaics panels.

Dear Commissioner Oettinger,

As the voice of the photovoltaic (PV) industry in Europe, EPIA would like to comment on the issue of automatic frequency disconnection of installed PV panels, which has recently been brought to your attention by the European Network of Transmission System Operators for Electricity (ENTSO-E).

In its letter dated from 18 July 2011, ENTSO-E highlighted the inadequacy of several current national standards specifying that PV inverters should automatically disconnect from the grid whenever the system frequency deviates by 0.2 or 0.3 Hz from the required normal value of 50.0 Hz. EPIA is committed to positioning PV as a reliable energy source in Europe, and therefore acknowledges the importance of carefully addressing this issue that might have an impact on the stability of the European electricity grid as a whole.

It should however be recalled that automatic frequency disconnection settings were imposed at a time when cumulative PV installed capacity was commonly expected to remain marginal. The stronger than expected growth in PV installations in the intervening years and the increasing role PV will play in the energy sector through progressive achievement of competitiveness, clearly require an adaptation of these inappropriate grid connection rules.

Our members have already proactively responded to the frequency disconnection issue in Germany, by ensuring that new inverters will be able to participate in the mitigation of a system overfrequency.

But EPIA would also like to bring its expertise and its knowledge of the PV sector in order to shed light on the two-phased approach suggested by ENTSO-E as far as the existing PV installed capacity is concerned. The PV industry has been an active stakeholder in the ENTSO-E "Requirements for Grid Connection Applicable to all Generators" network code development process; we believe our input could also bring some added value in the current discussion, and therefore suggest to set up bilateral meetings with your team and relevant stakeholders in order to identify win-win solutions for a high security of supply in Europe.

I remain at your disposal for any further information and look forward, dear Commissioner, to our future collaboration.

Sincerely,



Reinhold Buttgereit
Secretary General