



**ETSO Amendments to Proposal for a directive of the European Parliament and
of the Council on the promotion of the use of energy from renewable sources –
COM (2008) 19**

28 May 2008

EUROPEAN PARLIAMENT

2004



2009

Committee: Industry, Research and Energy

AMENDMENT by: European Transmission System Operators (ETSO)
Boulevard Saint Michel 15
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To DRAFT
REPORT/OPINION by

PE

On

Proposal for a Directive

COM (08): 0016

C6:

Date: Wednesday, 28 May 2008 Signature:

(Amendment 1)
Article 12, paragraph 1

1. Member States shall ensure that any national rules concerning the authorisation, certification and licensing procedures that are applied to plants for the production of electricity, heating or cooling from renewable sources, and to the process of transformation of biomass into biofuels or other energy products, are proportionate and necessary.

1. Member States shall ensure that any national rules concerning the authorisation, certification and licensing procedures that are applied to ***transmission and distribution lines***, plants for the production of electricity, heating or cooling from renewable sources, and to the process of transformation of biomass into biofuels or other energy products, are proportionate and necessary.

Justification

The development of electricity produced from renewable energy sources will increase the need for stronger grids and interconnectors. For Transmission System Operators to be able to meet this demand it is important that the authorities speed up and improve the authorisation process.

(Amendment 2)
Article 12, paragraph 2

2. Member States shall clearly define any technical specifications which must be met by renewable energy equipment and systems in order to benefit from support schemes. Where European standards exist, including eco-labels, energy labels and other technical reference systems established by the European standardisation bodies, such technical specifications shall be expressed in terms of those standards. Such technical specifications shall not prescribe where the equipment and systems are to be certified

2. Member States shall clearly define any technical specifications which must be met by renewable energy equipment and systems in order to ***be connected to the grid and to*** benefit from support schemes. Where European standards exist, including ecolabels, energy labels and other technical reference systems established by the European standardisation bodies, such technical specifications shall be expressed in terms of those standards. Such technical specifications shall not prescribe where the equipment and systems are to be certified

Justification

In order for Transmission System Operators to guarantee the security and the adequacy of the power systems installations wishing to be connected to the grid have to comply with the grid codes.

(Amendment 3)

Article 14, title

Access to the electricity grid

Access to the electricity grid ***and system development***

Justification

The challenge of integrating electricity from renewable energy sources will not only be for access to the grid but for grid development, and in general the development of the whole system.

(Amendment 4)

Article 14, paragraph 1

1. Member States shall take the necessary steps to develop grid infrastructure to accommodate the further development of electricity production from renewable energy sources, including interconnectors between Member States.

1. Member States shall take the necessary steps to develop ***the*** grid infrastructure ***and the electricity system in order to allow the secure operation of the electricity system*** to accommodate the further development of electricity production from renewable energy sources, including interconnectors between Member States. ***Related to this development, authorisation procedures for grid facilities should be accelerated and coordinated with renewable energy plant***

authorisation procedures.

(This amendment refers to amendment 1 on article 12 paragraph 1)

Justification

The integration of electricity produced from renewable energy sources requires the development of, not only the grid, but the system as a whole, since it will result in a more complex and advanced operation. The fast growing development of the electricity produced from renewable energy sources requires fast grid development and consequently better and coordinated authorisation procedures.

(Amendment 5)

Article 14, paragraph 2

2. Without prejudice to the maintenance of the reliability and safety of the grid, Member States shall ensure that transmission system operators and distribution system operators in their territory guarantee the transmission and distribution of electricity produced from renewable energy sources. They **shall** also provide for priority **access** to the grid system of electricity produced from renewable energy sources. **When dispatching electricity generating installations**, transmission system operators shall give priority to generating installations using renewable energy sources insofar as the security of the national electricity system permits.

2. Without prejudice to the maintenance of the reliability and safety of the grid, Member States shall ensure that transmission system operators and distribution system operators in their territory guarantee the transmission and distribution of electricity produced from renewable energy sources. They **may** also provide for priority **connection** to the grid system of electricity produced from renewable energy sources. **Member States may decide that** Transmission system operators shall give **dispatch priority with market based balance responsibility** to generating installations using renewable energy sources insofar as the security of the national electricity system permits.

Justification

Unlimited priority for electricity produced from renewable energy sources is contrary to the IEM directive, which requires non-discriminatory procedures among market players. Renewable energy plants have to have complete balance responsibility as this is in line with the open electricity market.

(Amendment 6)

Article 14, paragraph 3

3. Member States shall require transmission system operators and distribution system operators to set up and publish their standard rules relating to the bearing and sharing of costs of technical adaptations, such as grid connections and grid reinforcements, which are necessary in order to integrate new producers feeding electricity produced from renewable energy sources into the interconnected grid.

These rules shall be based on objective, transparent and non-discriminatory criteria taking particular account of ***all the costs and benefits associated with*** the connection of these producers to the grid and of the particular circumstances of producers located in peripheral regions and in regions of low population density. The rules may provide for different types of connection.

3. Member States shall require transmission system operators and distribution system operators to set up and publish their standard rules relating to the bearing and sharing of costs of technical adaptations, such as grid connections and grid reinforcements, which are necessary in order to integrate new producers feeding electricity produced from renewable energy sources into the interconnected grid. ***Member States shall ensure that the changes in the costs caused by this Directive are taken into account and transmission system operators and distribution system operators are compensated in tariff structures.***

These rules shall be based on objective, transparent and non-discriminatory criteria taking particular account of the connection of these producers to the grid and of the particular circumstances of producers located in peripheral regions and in regions of low population density. The rules may provide for different types of connection.

Justification

(Amendment 7)
Article 14, paragraph 5

5. Member States shall require transmission system operators and distribution system operators to provide any new producer wishing to be connected to the system with a comprehensive and detailed estimate of the costs associated with the connection. Member States may allow producers of electricity from renewable energy sources wishing to be connected to the grid to issue a call for tender for the connection work.

5. Member States shall require transmission system operators and distribution system operators to provide any new producer wishing to be connected to the system with a comprehensive and detailed estimate of the costs associated with the connection ***based on the costs referred in paragraph 3.*** Member States may allow producers of electricity from renewable energy sources wishing to be connected to the grid to issue a call for tender for the connection work.

(This amendment is linked to amendment 6 on article 14, paragraph 3)

Justification

(Amendment 8)
Article 14, paragraph 6

6. The sharing of costs referred in paragraph 3 shall be enforced by a mechanism based on objective, transparent and non-discriminatory criteria taking into account the benefits which initially and subsequently connected producers ***as well as transmission system operators and distribution system operators*** derive from the connections.

6. The sharing of costs referred in paragraph 3 shall be enforced by a mechanism based on objective, transparent and non-discriminatory criteria taking into account the benefits ***with regard to connection costs*** which initially and subsequently connected producers derive from the connections.

(This amendment is linked to amendment 6 on article 14, paragraph 3)

Justification

The calculation of the possible benefits for the entire system as well as the already connected producers will never provide an unambiguous result. A possible consequence of this might be distortion among applicants.

(Amendment 9)
Article 9, paragraph 3

3. Subject to the provisions adopted pursuant to paragraph 2, guarantees of origin may be transferred between persons in different Member States ***provided they have been issued in relation to energy produced from renewable sources by installations that became operational after the date of entry into force of this Directive.***

3. Subject to the provisions adopted pursuant to paragraph 2, guarantees of origin may be transferred between persons in different Member States.

Justification

This statement limits the disclosure market. It is very likely that physical trade of green electricity will take place instead. This physical trade might create unnecessary congestions in the grid and distort the electricity market.