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ACER reasoned opinion on the NC RfG: Views from the wind industry on the way forward

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Final NC RfG main concerns

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The ACER reasoned opinion on the NC RfG must be taken as an opportunity to alleviate the following key deficits:

<u>Missing CBA:</u> requirements in the NC RfG with no proper justification must be reconsidered, the list is long:

- Fast reactive current injection at FRT
- Limitations to U-Q/Pmax range for < 110 kV connected plant
- Post fault active power recovery: minimum recovery time
- Time and voltage parameters of FRT profiles
- Q capability below maximum capacity, particularly at P near 0 for type C
- Voltage range for Q provision : Clear distinction to be made between < 110 kV and > 110 kV connected plant
- *...to be continued*

Final NC RfG main concerns

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Art. 4 (3): to be clarified and made waterproof!

The door is open for arbitrary decisions by national TSOs via Art. 4.3 on non-exhaustive requirements.

Like it stands, this NC creates more uncertainty than clarity on non-exhausitve requirements!

- NRA role should be clarified, especially also in technical matters.
- 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 inappropriate requirements on generators while avoiding cost benefit analysis.
  - e.g. steady state Q capability, Active Power recovery; 0.85 p.u. voltage recovery after fault clearance

Conclusion

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NC Revision process must urgently tackle:

- Too much room for 'arbitrary' local TSOs decisions via Art. 4 (3) – failing proper CBA enforcement
- Requirements are still not properly justified – not technically / nor economically
  - Particularly severe with regards to some requirements introduced by ENTSO-E <u>last minute</u> (after end of public consultation and before submission to ACER)

EWEA ready to engage with stakeholders on these items during the revision!