EUTurbines

ENTSO-E User Group meeting on NC RfG

How to progress in areas of ACER's Opinion

Brussels

22 November 2012

WHO we are

70.000 employees in the sector
Business Volume 25 billion €
More than 6 billion € purchase volume in Europe (mostly to SMEs)

Issued position paper on NC RfG
Provides manufacturer-relevant answers on 2 out of 4 areas of ACER's opinion.

ACER opinion, p.6
NC shall justify of the significant deviations from existing standards and requirements (1/2)

Power output vs. frequency

As-is

- Go further than any current regulation
- Incur loss of efficiency and flexibility with current and tomorrow's technologies

Solution

- Modify requirement
- Balance cost to develop, install, operate, and bear risks of failure **vs.** alternative measures on network side

Frequency response time

As-is

•Define "Maximum choice as 30s"… pass criteria may be lower!

•Expose to unexpected tightening of req't

Solution

•Modify requirement

•Re-write response time "≤30s" (UCTE-type of verbiage)

Strong technical limitations…
Propose to change the two above requirements

ACER opinion, p.6
NC shall justify of the significant deviations from existing standards and requirements (2/2)

Fault Ride Through

As-is
- Applied to generation only
- BUT behaviour varies on operating regime AND grid characteristics
- Grid data are seldom made available…

Solution
- Modify requirement, and add process
- Urge TSO to
  - Provide detailed information
  - Contact and work with manufacturers to find optimal solutions (on generation OR transmission sides)

Application for Combined Heat and Power plants

As-is
- CHP are exempted
- Exemption is valid as alternate will:
  - Put at stake plants reliability (may happen to disconnect as not designed for frequency regulation
  - Menace efficiency (design would provide freq margin…not optimize!)
  - Jeopardize opportunities (plant owners may prefer derating and not export residual power)

Solution
- **Keep exemption**

Propose to modify FRT requirement and keep CHP exemption

ACER opinion, p.9
National scrutiny of the Network code to be implemented at the national level

As-is
- The decisions left to individual NRAs may create discrimination, and may result in non justification of requirements

Solution
- Reduce use of non-exhaustive requirement in NC RfG
- Define process to interpret requirements not only in light of NC RfG but also along its supporting documents (e.g. FAQ)

Propose to avoid non exhaustive requirements

Thank you

For further information, please read
EUTurbines NC RfG position paper (Nov 12)

Should you have any question, please contact the General Secretariat of EUTurbines:

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BACK-UP