



COGEN Europe proposed amendments to the NC RfG

15 January 2013



Significance test

Draft NC RfG	COGEN Europe Proposal
ARTICLE 2 – DEFINITIONS (Glossary)	
	<i>(New) Accumulated Level of Penetration of a Technology Group – refers to the aggregated Maximum Capacity of all the Power Generating Modules in a Technology Group as a percentage of the Peak Load capacity in a given synchronous area.</i>

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ARTICLE 2 – DEFINITIONS (Glossary)	
	<i>(New) Technology Group – Group of power generation technologies which have common distinguishable characteristics with respect to frequency response.</i>
Justification	
<p>Given that there are a range of technologies within the type A generator category, each has its own and different characteristics with respect to the different Network Code articles and sub-clauses. There is no implicit accumulation of the behaviours which suggest that the capacity of different non-significant grid users' needs to be added. However, technologies with identical behaviours should be treated cumulatively.</p>	

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ARTICLE 2 – DEFINITIONS (Glossary)	
	<p><i>(New) Significance Test for Generators – is employed to determine the significance of a Power Generating Module in a Technology Group based on penetration and aggregate reactions to network conditions in a specific synchronous area. A Power Generating Module is deemed significant in accordance with the Significance Test if the Accumulated Level of Penetration in a given synchronous area exceeds a certain level, that is decided and reviewed regularly, but not more often than ..., by(according to a suitable established process). The Significance level shall initially be set at 0.1% of maximum system load in the respective synchronous zone</i></p>
<p>Justification</p> <p>The most difficult situation to address is a major disturbance with a dynamic frequency drop beyond the design specification of a given synchronous area. Using this as the determining factor, the authors propose as a criterion for significance under frequency disconnection of a total installed capacity of around 0.1% of maximum system load in the respective synchronous zone. The 0.1% level is a conservative estimate and higher accumulated penetrations may be possible.</p>	

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ARTICLE 3 (6) – SCOPE	
	<p>3 (6) (a) A Power Generating Module is of Type A if its Connection Point is below 110 kW, and its Maximum Capacity is 0.8 kW or more and <i>is deemed significant following the application of the Significance Test for Generators.</i></p> <p>Requirements applicable to Type A Power Generating Modules are the basic [...]</p>
<p>Justification</p> <p>COGEN Europe believe that for a healthy innovation environment within Type A module micro generators a significance test should be used to minimize innovation risk due to advancing NC requirements.</p>	

Derogation process

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ARTICLE 52 (3)	
2. It shall apply as well to Network Operators when applying for derogations for classes of both existing and new Power Generating Modules connected to their Network.	2. It shall apply as well to Network Operators when applying for derogations for classes of both existing and new Power Generating Modules connected to their Network. <i>Network Operators shall initiate a derogation procedure at the request of third parties, including but not restricted to manufacturers of Power Generating Modules, belonging to a Technology Group.</i>
<p>Justification</p> <p>Restricting the original applicant to the grid user is not practical: The user of the network, in the case of the very small Type A module, is an individual home owner. It is unrealistic to expect that an end consumer will make such an application for a product or that thousands of home owners should be expected to make individual applications. The manufacturer of Type A generating units acting on behalf of future and current consumers is the appropriate applicant for derogation.</p>	

Draft NC RfG & (in italics) Briefing Note ENTSO-E of 17 th December 2012	COGEN Europe Proposal
ARTICLE 52 (3)	
<p>3. The derogation process shall be transparent, non-discriminatory, non-biased, well documented and based in particular on the Cost-Benefit Analysis performed, in the conditions set forth by Article 33(4) and (5), by the Relevant Network Operator in coordination with the Relevant TSO. Cost-Benefit Analysis does not need to be performed by the Relevant Network Operator if, on its reasoned request, an individual exemption is granted to the Relevant Network Operator by the National Regulatory Authority.</p> <p><i>National Regulatory Authorities may set specific derogation criteria for connections for a limited period or for a limited system wide volume of certain types of generation technologies taking into account the recommendation of the Relevant Network Operator in coordination with the relevant TSO. These specific criteria shall be communicated to ACER by the National Regulatory Authority. ACER will open a consultation process in order to ensure that a non-discriminatory and objective treatment is</i></p>	<p>3. The derogation process shall be transparent, non-discriminatory, non-biased, well documented and based in particular on the Cost-Benefit Analysis performed, in the conditions set forth by Article 33(4) and (5), by the Relevant Network Operator in coordination with the Relevant TSO. Cost-Benefit Analysis does not need to be performed by the Relevant Network Operator if, on its reasoned request, an individual exemption is granted to the Relevant Network Operator by the National Regulatory Authority.</p> <p><i>National Regulatory Authorities may set specific derogation criteria for connections for a limited period or for a limited system wide volume of certain types of generation technologies taking into account the recommendation of the Relevant Network Operator in coordination with the relevant TSO. These specific criteria shall be communicated to ACER by the National Regulatory Authority. ACER will open a consultation process in order to ensure that a non-discriminatory and objective treatment is</i></p>

<p><i>guaranteed EU-wide. ACER's opinion shall be taken into account by the NRAs. The criteria set by the Relevant National Regulatory Authority shall be non-discriminatory, objective and shall be published by the National Regulatory Authority.</i></p>	<p><i>guaranteed EU-wide. ACER's opinion shall be taken into account by the NRAs. The criteria set by the Relevant National Regulatory Authority shall be non-discriminatory, objective and shall be published by the National Regulatory Authority.</i></p> <p><i>ACER shall initiate a consultation process on granting a EU-wide derogation for connections for a limited period or for a limited system wide volume of a certain Technology Group at the request of a third party, including but not limited to a manufacturer, provided that enough evidence is made available, including a Cost-Benefit Analysis performed by the third party in line with the conditions set forth by Article 33(4).</i></p>
<p style="text-align: center;">Justification</p> <p>Restricting the original applicant to the grid user is not practical: The user of the network, in the case of the very small Type A module, is an individual home owner. It is unrealistic to expect that an end consumer will make such an application for a product or that thousands of home owners should be expected to make individual applications. The manufacturer of Type A generating units acting on behalf of future and current consumers is the appropriate applicant for derogation.</p>	

Exemption for CHP employed in industrial processes

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Article 3 (6) (h)	
<p>Without prejudice to the general applicability of the requirements set forth in this Network Code, a requirement of this Network Code shall not apply to Power Generating Modules of facilities for combined heat and power production (CHP) embedded in the Networks of industrial sites in the following cumulative circumstances:</p> <ul style="list-style-type: none"> - the primary purpose of these facilities is to produce heat for production processes of this industrial site; - the generation of heat and power are rigidly coupled to each other, i. e. any change of heat generation results inadvertently in a change of Active Power generation and vice versa; - the Power Generating Modules are of Type A, B or C according to Article 3(6) (a) to (c); and - the requirement is related to the capability maintain constant Active Power output or to modulate Active Power output other than Article 8(1) (c) and (e). 	<p>Without prejudice to the general applicability of the requirements set forth in this Network Code, a requirement of this Network Code shall not apply to Power Generating Modules of facilities for combined heat and power production (CHP) embedded in the Networks of industrial sites in the following cumulative circumstances:</p> <ul style="list-style-type: none"> - the primary purpose of these facilities is to produce steam heat for production processes of this industrial site; - the generation of steam heat and power are rigidly coupled to each other, i. e. any change of steam heat generation results inadvertently in a change of Active Power generation and vice versa; - the Power Generating Modules are of Type A, B or C according to Article 3(6) (a) to (c); and - the requirement is related to the capability maintain constant Active Power output or to modulate Active Power output other than Article 8(1) (c) and (e).
<p>Justification</p> <p>Steam is only one of the different forms of heat carriers employed in industrial processes which use CHP.</p>	