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Sent: Friday, January 11, 2013 1:59 PM
To: Edwin Haesen; ralph.pfeiffer@amprion.net
Cc: Thanh-Thanh Le Thi; Buquet, Maxime (GE Power & Water); Tomschi, Ulrich (E F ES EN PTEC PE 3); Luca Guenzi; matthias.zelinger@vdma.org; assistant.euturbines@mcm.be; Kirsten Parczyk; Dimitrios Chaniotis
Subject: EUTurbines: NC RfG user group meeting Jan 16- LETTER TO ENTSOe prior to the next stakeholder meeting

EUTurbines

Dear ENTSO-e Team,

EUTurbines welcomes the organization of the 16th of January workshop as a further step to solve the residual issues of NC RfG.

In order to prepare the meeting we would kindly ask you to consider adding the following item at the agenda:

1/ EUTurbines' main views on NC RfG document and Briefing Notes

- a) Significance test:
Briefing Notes mention that ACER's point makes possible manufacturers to come in the derogation process, but ENTSO-E considers that we can "not be given a formal role or responsibility in [this]". We do advocate for a role of manufacturers, to be recognized as "valid advisors" in this derogation process.
- b) Justification of deviations:
 - i. FRT: We are strongly in disagreement with ENTSO-E 's statement, "the industry is ready for this requirement". This is oversimplifying, and assuming that interpretation at national level will be technology-smart and flaw-less. We ask for more clarity/details in this requirement
 - ii. CHP: We are confused by the prerequisite to exemption saying that "the requirement is related to the capability to maintain constant Active Power output or to modulate Active Power output other than Article 8(1) (c) and (e)." Is it an obligation to handle LFSM-O and power output vs. frequency profile in CHP? Please let us know.
 - iii. Output vs. frequency appears to be ignored in briefing notes. We shall highlight again that this point has not been to us properly assessed and answered (cost of rq't vs. residual risks)
 - iv. Frequency response time. Our request for clarification seems not to be mentioned. Please consider doing this modification in NC RfG.
- c) Implementation at national level. We consider that the proposed modifications do not solve remaining issues on transparency and justification of national interpretation. As such, we would like to understand who and what process is in place to oversee this. What is currently happening in Germany is a striking example of not considering (or non-compliance with) NC RfG, showing that the objectives of the NC cannot be fulfilled as it is.
- d) Recovery of costs.
No comments from EUTurbines.

2/ Organisation of four specific meetings on those four points mentioned by ACER.

Indeed, our Association sees no chances of success in resolving gaps without giving us the chance of a thorough review. Justification of deviations shall be at least a one-day discussion. Please consider setting this up.

From the agenda's standpoint, please let us know if short interventions from stakeholders will be possible.

We look forward to debating with you next week.

Kind regards,

Maxime Buquet
Luca Guenzi

-Chairman and Co-Chairman EUTurbines TF Grid Code-
EUTurbines-

Florian Boeger

- Manager of European Affairs