



DSO Associations Comments on ENTSO-E Briefing Note on Network Code RfG (17/12/2012)

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1. Significance Test / Refining Derogation Procedure

Proposed amendment of art. 52(3):

“NRA may set specific derogation criteria for connections for a limited period or for a limited system wide volume of certain types of generation ... criteria shall be communicated to ACER ... ACER will open a consultation process...”

- May each NRA decide on what ‘limited’ means separately?
- The NC should be more specific in this respect

2. Justification of Significant Deviations

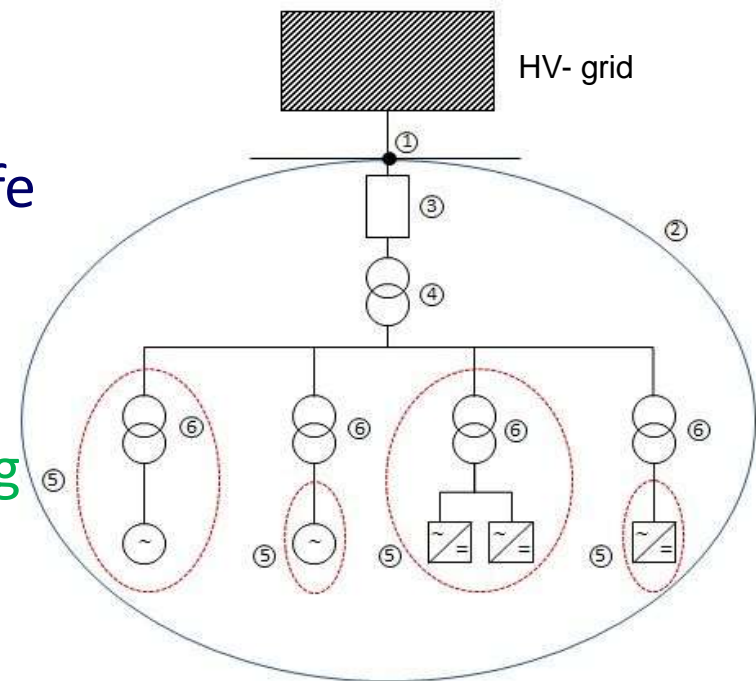
Fault-ride through for Type B (>110 kV & max. capacity threshold – see table):

- DSO TEG does not contest the provided justification for capability of MVFRT but questions necessity of LVFRT (may fall under type B in some countries)
- CBA on LVFRT based on measurements in Italian network proves this
- Unclear definition between requirements for modules and facilities at the connection point comes back

| Synchronous Area | maximum capacity threshold from which on a Power Generating Module is of Type B |
|--------------------|---|
| Continental Europe | 1 MW |
| Nordic | 1.5 MW |
| Great Britain | 1 MW |
| Ireland | 0.1 MW |
| Baltic | 0.5 MW |

‘Responsibility gap’ because of unclear determination of requirements at the connection point(s)

- Clear definition of requirements for generators at the grid connection point(s) to public grid are key for safe grid operation.
- RfG definition is unclear, based on requirements for „Power Generating modules“
- Review of definitions and related procedures for compliance is necessary (need for well-defined compliance tests)



- 1 Grid Connection Point
- 2 Power Generating Facility
- 3 Point of transfer
- 4 Grid Transformer
- 5 Power Generating Unit
- 6 Generating Unit Transformer (not a part of the unit)

3. National scrutiny (Art. 4(3))

- DSO TEG welcomes more clarity on art. 4(3) that now clearly states that the TSO is not in all cases the deciding actor.
- The DSO, when being the Relevant Network Operator (for generators connected to their grids), shall be adequately involved in the process

4. DSO TEG fully supports ENTSO-E views on cost recovery

- In the context of already high pressures on network costs due to major investments needed at distribution level ...
- ...the RfG network code as well as other network codes on grid connection and system operation imply further costs for DSOs: new and increased requirements lead to added capital expenditure (i.e. reactive power management) and high administrative costs (i.e. compliance monitoring)
- Recovery of reasonable and proportionate costs in a timely manner via network tariffs is an absolute necessity for DSOs
 - Cost assessment will have to be done at national level
 - Link with CBA: Knowledge of costs would allow for proper evaluation of new requirements