



EWEA
THE EUROPEAN WIND ENERGY ASSOCIATION



EWEA feedback on ENTSO-E briefing note on NC RfG

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ACER reasoned opinion states:

Page 4: *adequate justifications should be provided ...*

From the briefing we observe that ENTSO-E will not provide more justifications (especially on the relevant EWEA points of concern) – **How is the ACER reasoned opinion then met?**

Page 5: *issues can be addressed by :*

Targeted amendments

Increasing flexibility of provisions

Amending supporting documents

All of this still has to be seen; the note does not make us optimistic

Page 5: *without reopening the overall structure:*

Wording suggests that parts can (and should) be amended without changing the structure. The request of EWEA to address its points of concern is fully in line with how we read the ACER

Wind and solar industry: joint expression of concerns

- ❖ Technically, the concerns of both industries are largely identical as both technologies make use of power electronic converters.

Focus now on 2 of 4 responses of ENTSO-E

Justification
of significant deviations



FRT introducing fast reactive current

National scrutiny of
NC requirements



Introducing: deus ex machina

Justification of significant deviations (1)

Briefing Note is unjustly restricting its answer to ACER to article 9(3)a of the NC:

- ACER mentions: **voltage related issues at MV level.**
- ENTSO-E Briefing Note FRT argumentation avoids to mention fast current injection requirement **that is implicitly a very essential part of FRT.**

Until proper action of ENTSO-E the **FRT requirement** thus remains not justified, not documented, nor based on any system studies.

Justification of significant deviations (2)

- Discussions between ENTSO-E and EWEA/EPIA in the last months have not resulted in any indication that the 10 ms issue will be corrected by ENTSO-E
- Stakeholders to be aware that the NC FRT requirement became **the Trojan Horse** for introducing this requirement.
- Despite repeatedly expressed concerns of UG members, the issue is even not mentioned in the Briefing Note.
- Instead, the Briefing Note is ignoring the 10 ms issue - introduced last-minute before publication - **and without proper justification based on documented system studies.**

ENTSO-E is displaying a serious underestimation of

Justification of significant deviations (3)

Voltage related issues at distribution level:

- ACER mentions: **at least for one such requirement ...**
- Reactive power – voltage ranges (U-Q and P-Q requirements) at MV level is such a requirement .
- Justification is missing in the Briefing Note that the NC RfG implicitly applies HV rules for reactive power at the MV level.

Justification of significant deviations (4)

- HV Voltage range related rules to MV: >> needless and costly overdimensioning of equipment.
- Better would be to adapt the NC so that no justification should be looked after for such unjustifiable requirements.
- EWEA / EPIA do not accept the minimalistic approach of ENTSO-E (limitation to one issue) and have provided a concrete proposal to be adopted in the NC - > see joint EWEA-EPIA position paper with alternative formulations.

Justification of significant deviations (5)

EWEA disagrees on conclusions in the Briefing Note:

- the justifications for key requirements remain absent;
- Need for amending provisions of the code on
 - fast current injection during FRT
 - Active power recovery after a network fault
 - Specific UQ requirements for distribution level

National scrutiny of the NC's requirements (1)

- Article 4(3) in the June 2012 version was inadequate:
 - Many concerns remained on national implementation of non-exhaustive requirements
- The Briefing Note explains the double intention of Art 4(3) but leaves us in the dark on the provisions in the NC for the general TSO/DSO decision-making framework
- Thus, this TSO/DSO decision-making framework is introduced in a similar way as a **deus ex machina**

A ***deus ex machina*** Latin: "god from the machine"; is a plot device whereby a seemingly unsolvable problem is suddenly and abruptly solved with the contrived and unexpected intervention of some new event, character, ability, or object.










Depending on usage, it can be used to move the story forward when the writer has "painted himself into a corner" and sees no other way out, to surprise the audience, or to bring a happy ending into the tale.

National scrutiny of the NC's requirements (2)

- New proposal of article 4(3) again mentions: TERMS AND CONDITIONS FOR CONNECTION AND ACCESS
- origin of this terminology can be found in Article 37 of Directive 2009/72: deals only with economic/legal aspects – the formulation does not provide more confidence.
- The suggestion of ACER reasoned opinion to explicitly mention *an entity competent for technical matters* is not taken up. The reference to Directive 2009/72 is overly vague.
- Conclusion: as long as the language in the Article 4(3) is not clear on our concerns (and the ones of ACER), we do not agree with these conclusions of the briefing

Conclusions

- Current ENTSO-E approach is disappointing in view of the severity of the deficits
- The goal in this revision process must be to come up with targeted amendments rather than defensive briefing notes.
- The identified deficits are still to be alleviated!

Issue	Concern	EWEA comment	Solution acceptable to the industry – described in recent policy paper [*] The world's highest standard – homogeneous across all of Europe
lq – 10 ms (66 %) New minimum limit	 	Unrealistic No documentation of need Holistic design view missing Fully fluffy definitions Many technical bindings Many discussions	60 ms (90 %) 
P recovery time Kept fully undefined	 	Excessive uncertainty for manufacturers Many technical bindings Many discussions	0.5 s (90 %) 
UQ-chart Deviation from typical best-utility-practice		Not a cross border issue Shift of cost from utility to generation – VAR's for free !	Separate MV and HV Cut-the-corners  (typical best practice)
Article 4(3)		Very concerned – high risk of - many discussions - legal interpretation trouble - disputes/derogations - TSO/DSO discussions - trials	?? 