

Florence Forum

3.4. Lessons from the Pilot Phase State of Play

Grid Connection, FG and NC

May 24th 2011

Grid Connection – ACER's FG

EURELECTRIC favours harmonisation of minimum connection requirements: important for integrated EU energy market; level-playing field at EU level, but

- **COMMON BINDING MINIMUM REQUIREMENTS**
- **CROSS BORDER ISSUES – definition missing!**
 - Need to be properly defined, otherwise harmonisation and subsidiarity will never match!
- **Impact assessment/Cost benefit analysis: required!**
 - Should highlight the main policy options and give evidence to the choices made
- **System operation FG and subsequent NCs missing!**
 - It is of the outmost importance to understand how the electricity system will be operated in 5-10 years before entering into the details of connection requirements
- **Avoid unnecessary requirements to existing users**
 - Need to protect existing generators from unnecessary requirements, irrespective of the associated costs;
- **Role and powers of DSOs**
 - Requirements on DSOs should apply at the connection point between TSOs and DSOs. How DSOs regulate connection regimes with distributed generation is their responsibility

Grid Connection – ENTSO-E's NCs

1. EURELECTRIC general position: close cooperation between TSOs, DSOs and Power Generators is key for success, common objective
2. CONCERN WITH PROCESS, e.g. Official consultation for two months, not one.
EURELECTRIC calls on ENTSO-E to stick to the official procedure
3. Common minimum binding requirements
4. Impact Assessment and CBA
5. Justification for chosen categories (like frequency ranges)
6. Derogations
 - FG doesn't clarify who bears responsibility for granting derogations
 - NC stipulates that “Users may apply for derogation to this Network Code by submitting a request to the Relevant Network Operator”. In other words, TSOs set principles and judge them

Link to EURELECTRIC position papers by Generators (February 1st 2011) and DSOs:

http://www2.eurelectric.org/DocShareNoFrame/Docs/1/NAFIHKCAADEBDIODOCOFFHBJ59VLOL5RVG5CSHAPH7VN/Eurelectric/docs/DLS/EURELECTRIC_comments_draft_network_code_for_grid-2011-150-0001-01-E.pdf