



EWEA

THE EUROPEAN WIND ENERGY ASSOCIATION

EWEA response on the consultation on the ENTSO-E second annual Work Programme 2010-2011

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1. General remarks

EWEA welcomes the ENTSO-E consultation on its second annual work programme as required under the third Liberalisation Package and recognises it as a step towards the achievement of the goals outlined in this crucial piece of EU legislation. We believe that this consultation will bring additional benefits with regard to the quality of the final deliverables foreseen in the third Package, in particular network codes and the Ten-year network development plan (TYNDP). The TSOs have set up ENTSO-E prior to the full implementation of the third Package in March 2011 with a dedicated organisational outline and responsibilities as well as an ambitious first work programme. EWEA wishes to express its ongoing support to ENTSO-E in this early start and for the demanding tasks it has set itself, which will require stakeholders to work closely with ENTSO-E. This will facilitate progress on the issues of most interest to EWEA, particularly the pilot code on grid connection with special focus on wind generation and the TYNDP.

2. Key areas of work throughout 2010 and 2011

a. Network code preparatory work

ENTSO-E rightly states in the consultation document that the network code priorities for 2011 should be based on the need to ensure secure network operation, the integration of RES and market integration, and on the other hand on enough clarity and consensus between the relevant stakeholders on goals and methods. In this context, EWEA fully supports the priority work on the "pilot code" on grid connection with a special focus on wind generation, and welcomes ENTSO-E's ambition to complete its work by early 2011. Regarding the content and structure of the pilot code, EWEA will of course remain committed to maintaining the dialogue with ENTSO-E on this crucial deliverable for the European wind industry¹.

¹ EWEA's position on harmonising grid code requirements for wind power generation in Europe has been described in the response to the first ENTSO-E annual work programme. For more detailed information, see:

http://www.ewea.org/fileadmin/ewea_documents/documents/publications/position_papers/091210_EWEA_Harmonising_Europes_GC_for_the_Connection_of_Wind_Power_Plants.pdf

EWEA urges ENTSO-E to ensure:

- that the stated goal of "identifying and developing European rules harmonising grid code requirements particularly relevant to wind power generation" can be achieved in this first pilot code; and
- that previous and ongoing work from the wind industry on this subject is properly taken into account².

EWEA furthermore regards all ENTSO-E's preparatory work on a forthcoming network code on capacity allocation and congestion management rules as very important for a cost-effective large-scale integration of variable RES, such as wind power. The momentum for creating proper market integration models is evident with the ongoing work of the "Ad-hoc Advisory Group", the Florence Forum and ERGEG's intention to publish a first draft Framework Guideline on capacity allocation and congestion management later this year. As stated in the response to the first ENTSO-E annual work programme, EWEA calls for a swift deployment of such market design rules, particularly on cross-border electricity markets in intraday timeframes. The uptake of liquid intraday electricity markets is crucial for the smooth integration of large amounts of wind energy and constant cross-border trading in the intraday timescale. This should be facilitated through implicit continuous capacity allocation and gate closure times as close to real time as possible, as well as the application of intra-day power supply and demand forecasting, including for wind power, to allow for low reserve requirements. A swift development of a subsequent network code on capacity allocation and congestion management would therefore be most welcome.

Regarding ENTSO-E's intention to prepare two first system operation-related network codes (on operational security and on primary, secondary and tertiary control and reserves), EWEA is convinced that this will be of added value for the operation of power systems with a large share of variable energy sources, such as wind power. In particular, EU-wide rules for the coordination of system operation and the determination of the common operational principles should help wind power integration (e.g. by minimising the need for curtailments) and ensure a better coordination of cross-border power flows. In this context, EWEA calls on ENTSO-E to take due account of the provisions in the Directive (2009/28) on the promotion of the use of energy from renewable sources, especially in relation to priority or guaranteed access to the grid for renewable electricity, priority during dispatch, and the requirement to minimise curtailments of RES. In this respect, EWEA also urges ENTSO-E to investigate options for the "pooling" of wind power forecasts to minimise overall balancing cost and consumer prices.

Furthermore, EWEA plans to actively participate in subsequent consultations and workshops on these issues.

² EWEA published in December 2009 a first "Generic Grid Code Format for Wind Power Plants": http://www.ewea.org/fileadmin/ewea_documents/documents/publications/091127_GGCF_Final_Draft.pdf

b. The Ten-Year Network Development Plan (TYNDP)

Ahead of the implementation of the third Package in early 2011, ENTSO-E published a first pilot version of the TYNDP in March this year focussing on bottom-up scenarios and highlighting mainly short to mid-term trends in grid reinforcements, which have up to now been proposed by TSOs.

The Pilot TYNDP has been welcomed and also extensively commented on by a wide range of stakeholders from the power sector and the expectations of the first official version of the TYNDP, due in early 2012, have been made clear³.

As stressed by the European Commission at the last Florence Forum meeting, "the plan needs further development and should be based on proper scenarios and market- and network modelling and in particular reflect the National Renewables Action Plans"⁴. EWEA therefore welcomes ENTSO-E's decision to develop market and network modelling criteria and methods to be applied in the first official TYNDP in 2012. Importantly, this work programme outlines the commitment to apply a top-down pan-European approach during 2011 and to already reflect this in the 2011 ENTSO-E System Adequacy Forecast.

Again, EWEA can only reiterate its view that best use of the TYNDP must be made as a key tool for a truly European approach to grid planning, and that it should be updated it as soon as possible to reflect the content of the National Renewable Energy Action Plans (NREAPs), together with a list of priority projects to convert the TYNDP from a mere forecast document into a concrete implementation plan.

c. Further key areas of TSO cooperation

Another important key area of work has been rightly identified as a long-term system/grid strategy up to 2050. The goal must be to develop a roadmap towards a pan-European supergrid able to handle all power generation coming from RES in the time-frame up to 2050, with up to 50% of electricity demand met by wind power. Accordingly, EWEA remains committed to maintaining a dialogue with ENTSO-E on this matter, particularly focussing on transmission infrastructure, changes in system design and operation, and the development of integrated cross-border electricity markets.

Furthermore, EWEA welcomes ENTSO-E's intention to publish a consolidated R&D plan for TSO needs and plans to participate in subsequent consultations or workshops in this area.

³ See the EWEA response to the Pilot TYNDP :

http://www.ewea.org/fileadmin/ewea_documents/documents/publications/position_papers/EWEA%20response%20to%20the%20consultation%20on%20the%20first%20TYNDP%20draft.pdf and the EWEA-Eurelectric Joint Declaration on grid development and market integration:

http://www.ewea.org/fileadmin/ewea_documents/documents/policy/position_papers/EWEA_EURELECTRIC_Joint-Declaration_9June2010.pdf

⁴ See Florence Forum conclusions:

http://ec.europa.eu/energy/gas_electricity/doc/forum_florence_electricity/meeting_018_conclusions.pdf

Further areas of ENTSO-E's work which EWEA regards as relevant and plans to actively participate in are investment initiative schemes for new transmission infrastructure, ancillary services, offshore grid development and coordinated system operation.

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The European Wind Energy Association (EWEA) is the voice of the wind industry, actively promoting the utilisation of wind power in Europe and worldwide. It now has over 650 members from 60 countries, including manufacturers with a 90% share of the world wind power market, plus component suppliers, research institutes, national wind and renewables associations, developers, electricity providers, finance and insurance companies and consultants. This combined strength makes EWEA the world's largest and most powerful wind energy network.