

## **EWEA response to the ACER consultation on the Framework Guidelines on Electricity Grid Connection**

### **Comments on the structure and the Framework Guidelines in general:**

EWEA welcomes that the ACER Framework Guidelines contains improvements in its structure, as the previous categories in the ERGEG Pilot Framework Guidelines such as “distributed generation” are now deleted. However, there is still a lack of a clear indication with regards to the handling and criteria for classification of the different generation types in the Network Code. EWEA believes that generation technologies should be categorised simply by name, according to their primary energy source and its transmission entry capacity.

It remains furthermore unclear why the section on governance is now deleted in the present ACER Framework Guidelines. Such a section would be important with regards to how any new requirement would be introduced and governed practically at a European level in the Network Code with the requirements agreed and specified at an EU level first, and then rolled out to the local level. Such a section should state that all TSOs in Europe have Network Codes and specifications appropriately put in place and cannot therefore delay or refuse connection of any technology or unfairly discriminate in operation as a result. In EWEA’s view as few issues as possible should be left to national codes and local TSO in order to avoid that the actual borderline in terms of cross border issues remains blurry and not well defined when it comes to network management rules in an interconnected European power system. In this context clear and systematic specifications would be the actual added value of a network code, with the corresponding Framework Guidelines demanding those and clarifying their roll-out in a section on governance.

The worst case would be a supplementary regulatory layer at European level, adding rather than solving existing diversity in network management rules: the real risk is then having over 30 unharmonised national rules on grid connection with a high degree of diversity in technical requirements remaining, with an additional European regulation requiring a multiplicity of interpretations by ENTSO-E on a case-by-case basis. Such a diversity is not only making power generation unnecessarily expensive as it would increase the necessity for maintaining locally adapted products and maintaining staff for interpretation of network codes, but it also causes additional costs for network operators due to a persisting diversity of technical requirements across the EU.

ACER should therefore consider amending the current Framework Guidelines with a governance section covering quality principles for ENTSO-E during the development of a network code (to this end it could also alternatively refer to the ENTSO-E rules of procedure, and there more specifically on the ENTSO-E network codes development process), and in addition outline the maintenance cycle of the network code and its interplay with national codes. If a dedicated section on this is not wanted, the section 2.4. “Adaptation of existing

arrangements to the network code” could be used for an inclusion of the above mentioned items.

In general ACER should make ENTSO-E in these Framework Guidelines strive for the highest possible level of clear and systematic specifications in the network codes in order to ensure a practical and unambiguous application.

### **Comments on section 1 General Provisions:**

#### **1.2 Application and 1.3 Definition:**

EWEA can only reiterate its view that it is highly confusing to include DSOs also as a grid user per se. Under the section “application” DSOs are considered as grid users whereas under the section “definitions” it reads as if they are both grid users and system operators. Instead, it should be clearly stated if a DSO is in the context of the framework guideline considered as a grid operator, a grid user or both.

There is no definition given what a significant user is other than that it should be defined in the network code(s). EWEA therefore suggests deleting this item under the section “definitions”.

Furthermore, a definition of ancillary services should be given, see also next section.

### **Comments on section 2 minimum standards and requirements for connections**

EWEA believes that balancing should neither be in the scope of the framework guideline nor the respective network code on electricity grid connection. Balancing is a task (of the system operator), not a technical connection requirement. Some Generation units may need to have provisions to enable the system operator to execute this task. In this respect all requirements on balancing should be covered in the framework guidelines on balancing and the according network code hereon.

Moreover, the provision of ancillary services is stated in the list of requirements, unfortunately without defining them. Although it makes full sense that variable generation may be forced to contribute to power system security in case of a large disturbance, variable renewables and any other generation must not be forced to provide ancillary services for free to the TSO and DSO. The FG must ask the NCs to make it clear:

- a) When a capability is required (in the generation plant) but where delivery of that capability is not compulsory and will be subject to a further voluntary contract.
- b) Where the capability is required and where the delivery of that capability is compulsory and is provided free of charge.



- c) Where the capability is required and where the delivery of that capability is compulsory and but will be rewarded at a market, agreed or regulated price.

EWEA believes that with regards to ancillary services there is the need to make optimal use of the specific characteristics of different generation technologies, given the fact that variable renewables provide grid support services, but not in an identical way as conventional thermal generation.

Whereas certain aspects of ancillary services procurement may be covered in the upcoming network code on balancing, we are still lacking a proper definition of ancillary services and linked deliveries at a European level. Furthermore, a wide range of ancillary services are a commodity with a market value and are to be traded as such. Therefore a market based approach to procuring ancillary services should be adopted where possible instead mandating compliance. This should be clarified in the current framework guidelines as well as which rules for ancillary services could be covered under already planned network code topics, i.e. network codes on balancing or on requirements and operational procedures in emergencies.

EWEA therefore suggests deleting the bullet point under 2.1 on “Balancing capabilities and provision of ancillary services”.

With regards to point 2.4 “Adaptation of existing arrangements to the network code” it remains unclear how the respective network code should be applied to already existing power generation installations. Adaption to existing installation should be furthermore justified by a cost-benefit analysis in order to show the actual value of adapting those generators to the requirements stated in the network code.

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