



Open letter from the wind and solar PV industries to ENTSO-E on the Network Code on “Requirements for Generators” (NC RfG)

January 2013

Dear Mr Staschus,

The European wind and solar industries, represented by EWEA and EPIA, have been closely involved in the development and ongoing revision process of the NC RfG.

As you are aware we prepared a joint association [paper](#)¹ at the beginning of January 2013 as constructive input in view of the currently on-going revision process of the NC RfG.

It is essential that the NC RfG, just as all ENTSO-E network codes, encompasses sound, non-discriminatory and well-balanced rules which are aimed at enhancing efficiency in system operation as well as maintaining security of supply and facilitating the integration of renewable electricity.

As it stands now, the wind and solar industries strongly disagree with the current NC RfG specifications in relation to the following three areas:

(1) The first main objection is the FRT specification for type B renewable power plants – one of the four issues raised in the ACER reasoned opinion – as they include requirements on fast reactive current injection that are exorbitant, discriminatory and far beyond typical best industry practice.

These requirements were introduced in the very last moment after the public consultation was finalised without proper justification or any real opportunity for discussion or engagement with the industry. The wind and solar industries sees a very high risk of non-intended secondary effects with this requirement as it is introduced for reasons that appear to have no foundation.

We have requested ENTSO-E to provide a reasonable technical and economic rationale for this requirement, with due regard both to power system security and generator capabilities.

(2) Our second main objection is to the vague formulation on the time for active power recovery after a fault within the current FRT specifications. To keep this aspect fully unquantified creates a huge technical and economic uncertainty for manufacturers as this aspect is one of the absolute key elements in FRT design. In a

¹ http://www.ewea.org/fileadmin/files/library/publications/position-papers/EWEA_EPIA_NC_RfG_concerns_and_alternative_formulations.pdf

wind turbine it will have a secondary impact on foundations, towers, gear-boxes, drive trains and many other electrical aspects.

(3) Our third objection is to the formulation of the voltage and reactive power requirements. This is related in a broader way to the concerns of ACER regarding deviations from present practices and leading to unjustified cost increases, as described in the Framework Guideline. Again, it remains very questionable if the current formulation in the NC RfG will improve existing grid stability.

On these three points, we have proposed solutions in the joint association paper, which closely follows the text of the NC RfG. Moreover, these proposed solutions are fully in line with typical best utility practice in large parts of the world, including Europe.

We believe that if the ENTSO-E NC RfG is not amended on these three crucial items, its enforcement will lead to unnecessary technology changes that instead of bringing incremental benefit will cause an increase of generation cost, distortion of fair industry competition and lengthy legal disputes at national level, and as a consequence will seriously endanger the achievement of the EU's 2020 renewable energy targets.

Europe is currently seen as the benchmark for integration of multiple forms of generation with many countries copying European rules and regulations for the integration of renewable energy generation technologies. Rules with dubious if any benefit will thus have a ripple effect in export markets for European technology.

We, the signatories of this letter urge ENTSO-E to appreciate our genuine concerns and make the necessary changes in the NC RfG ahead of the Comitology process. We consider the proposed solutions in the joint EPIA-EWEA position paper to be viable solutions on these controversial items.

We would be very happy to meet with you to discuss our concerns and highlight our willingness to continue working with ENTSO-E to find a mutually acceptable solution.

Our organisations are at your disposal to discuss these points in further detail and look forward to your response.

Yours sincerely,



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CEO EWEA,
European Wind Energy Association



Reinhold Buttgerit,
Secretary General, EPIA,
European Photovoltaic Industry Association

Cc: Matti Supponen, Tadhg O'Briain, Joachim Balke (DG Ener), Uros Gabriel (ACER)

Wind energy and solar PV companies as further signatories, in alphabetical order:



Gamesa



K A C O



new energy.



ENERGIZING LIFE TOGETHER



REC



RWE

The energy to lead



SOLAR TECHNOLOGY



Vestas

Wind. It means the world to us.