

# Network Code Requirements for Generators FEBEG position

28 May 2012



30 mei 2013



# Stand van zaken van de code

- Juli 2011: Publicatie van de Framework Guidelines door ACER
- Juni 2012: Indiening van 1<sup>ste</sup> voorstel van code door ENTSO-E bij ACER
- Oktober 2012: Publicatie van de opinie van ACER die vraagt voor de wijziging van 4 issues
- Februari 2013: Aanduiding door de Commissie van DNV-KEMA als onafhankelijke consultant voor uitvoering impact assessment
- Maart 2013: indiening van geamendeerd voorstel van code door ENTSO-E bij ACER
- 27.03.2013: aanbeveling van ACER aan de Commissie voor goedkeuring van de code
- 31.05.2013: start Comitology procedure
- Ten vroegste september 2013: finale impact assessment DNV-KEMA



# FEBEG main concerns NC RfG

1. Fundamentals of the NC RfG are wrong
  - First, consensus is necessary on how the system as a whole will be operated based on an agreed level of security and quality. These operational principles should be defined first in the network codes for system operation (NC for Operational Security, Planning and Scheduling and Load Frequency Control & reserves) before deriving requirements for connections of generating or demand facilities.
  - There is no balanced allocation of responsibilities between main stakeholders (TSO – DSO's – Producers – Consumers); now responsibilities and costs are pushed away from TSO, but benefits are with TSO's.
  - Without a conceptual design first, it appears that many inconsistencies between codes occur.



# FEBEG main concerns NC RfG

2. No guaranteed level playing field between generation installations in Europe
  - Too many requirements (41) are left to national/regional implementation.
  - Only after the national implementation, an effort for harmonization will be made = too late.



# FEPEG main concerns NC RfG

3. Lack of impact assessment and cost-benefit analyses
  - No impact assessment of the code has been undertaken. The assessment of the independent consultant DNV-KEMA is not expected before September 2013.
  - As it is now, without proper cost-benefit analyses of requirements, no control upon extra costs for producers exists. Alternative technical solutions can often offer a better cost-benefit ratio.
  - Serious doubts exist about feasibility for some critical consumers such as hospitals, communication centers,... (e.g. frequency below 48.0 Hz during more than 30 min).



# FEBEG main concerns NC RfG

4. Technically, the code is too demanding
  - Several requirements go beyond international standards.
  - Several requirements go beyond the technical limits of proven technology, endangering the reliability of power plants and consequently the security of supply.



## FEBEG main concerns NC RfG

- Real stakeholders consultation and consideration is necessary
- NC RfG should be set on hold until the system constraints and the requirements for TSO's are set out and agreed in the Comitology of the NC's for system operations



# FEBEG concerns NC RfG

+ andere punten:

- Stijging van de kosten van elektriciteitsproductie
- Framework Guidelines die door ACER opgesteld werden niet altijd gerespecteerd
- De algemene eis voor levering van ondersteunende diensten