

**COMMENTS AT THE FINAL REPORT
OF THE EXPERT GROUP
CRITERIA FOR SUBSTANTIAL MODERNIZATION
(CSM)**

GC ESC 7/12/2021



Historical Overview



30/09/2021 : Start consultation of the CSM final report

14/10/2021 : VGB mail to ACER and ENTSO-E with comments

15/10/2021 : Mail from ENTSO-E with proposal to add **comments as Annex to the report**

15/10/2021 : Mail from ENTSO-E with following announcements :

- We received one feedback for CSM report which we **will follow up on accordingly.**
- We are happy to say that the reports **will be publicly available on our website....**

21/10/2021 : VGB Mail to ACER and ENTSO-E accepting the proposal of an annex at the final report.

27/10/2021 : Mail from ENTSO-E stating:

For the record, changes to the reports are always possible **if the GC ESC decides so** and we can have “document control and versioning” to indicate those changes.

VGB cannot accept that ENTSO-E publishes a report without mentioning the existence of comments. This is violation of the principle of respect for stakeholders endangering a fair collaboration in the future.

Short description of the issues of the VGB comments



Comments are based on the principle of a unique European level playing field for all member states (MS).

Short description of the issues:

- Fair and realistic ranges are missing for the thresholds of increase/change of active power, reactive power and inertia.
- “RECOGNISED spare part” is not clear. The notion “recognised” is unknown in several countries.
- A change of the voltage level at the connection point, imposed by the TSO/DSO, cannot be considered as a substantial modernisation of the PGM. Such a change is NOT a subject of the RfG NC*.
- The „pro rata“ principle of modernisation for windfarms is not clear. How to apply this principle on the voltage or frequency ranges? A detailed description of the application of the „pro rata“ principle is needed.

(*) As justification of this position: see national implementation of the RfG NC in Austria page 10:

Keine wesentlichen Änderungen im Sinne dieses Teils der TOR sind z.B.:

- die Erneuerung von Maschinentransformatoren durch den Netzbetreiber auf Grund der Anpassung der Spannungsebene am Netzanschlusspunkt;

A philosophical question.

This topic stands outside the core competence of VGB and has not to be considered as a comment.

Art.13 and Art.14 of the RfG NC specify the requirements for PGMs type A & B to impose a unique European level playing field. Also the results of the EG BftA will be imposed at a European level.

Art. 4 specifies the rules for a substantial modernisation only for PGMs type C & D.

The requirements for a substantial modernisation of PGMs type A & B are subjected to national legislation.

As example:

A new photo-voltaic panel of 5 kW is designed according to the European RfG NC Art. 13 and the BftA EG
But if the inverter has to be replaced after X years, the rules of each member state apply.

Is this the intention of the expert group?

This does not sound logical.

A similar reflection can be made for demand connected at < 1000 V.

Conclusions



VGB asks for following actions:

- That this ESC would vote on the acceptance of the VGB comments in an annex at the final CSM report. The precise comments which were sent to ACER and ENTSO-E are added as back-up slides.
- That ENTSO-E will avoid repeating what happened with the report of the EG CSM and pending comments that are correctly submitted to ENTSO-E.
- The final goal of each EG is the submission of a final report describing a common position supported by all participants. VGB supports this intention completely. Nevertheless if no common position can be reached, the opinion of a minority of the participants should be inserted in the final report as „Opinion of minority XXX“. VGB proposes that all future EG are informed of this possibility.

QUESTIONS?

Back-up slides

Detailed VGB comments (1)

Ranges for the increase or change of active power, reactive power and inertia of PGMs are missing in the final report. The reason is a lack of time. This is unacceptable because a uniform level playing field will not exist in the future. Technological improvements to increase the total efficiency of a PGM by installing new blades in the turbine or a new rotor will be interpreted differently in each MS (Member State). For one MS an increase of the active power or inertia of 0.2% will be a substantial modernisation, for another MS a similar increase of 30% will be classified as a not substantial modernisation.

VGB proposes that fair and realistic ranges for the national threshold for all characteristics should be imposed by ACER and consequently by the Commission in which each MS can define its value and that the lower limit of the ranges does not endanger maintenance or efficiency improvements by classifying them as substantial modernisation. VGB proposes a range with an absolute value of 15% to 30% for a change of active power or reactive power and a range with an absolute value of 5% to 15% for the change of inertia.

Detailed VGB comments (2)



The report accepts that the use of RECOGNISED spare parts is never a substantial modernisation. But the word “recognised” is not defined. A spare part is well defined in EN 13306 and the expert group should respect the definition. VGB thinks that the expression “recognised spare part” could be common language in a few Member States but the majority of Member States uses the simple expression “spare parts”.

VGB proposes to erase the word recognised in this statement in order to use an expression understandable in all Member States

Detailed VGB comments (3)

The report states that a change of the voltage level at the connection point imposed by the TSO/RSO is a substantial modernisation and that *“The question of who bears the cost should already exist in national arrangements (costs-by-cause principle) and has not been considered further by the EG.”* If the TSO/RSO imposes a modification of voltage level, this is due to a restructuring of the network and that the PGM has to accept this. Such point of view is not in line with the intention brought in by the European Commission stating in 2016 in Art. 4 of the RfG NC: “power-generating facility owners who intend to undertake the modernisation ...”.

VGB proposes to erase the process of a change of voltage level initiated by the TSO/RSO completely in this report. It is a completely different process and stands outside the scope of a substantial modernisation initiated by the owner of the PGM

Detailed VGB comments (4)

The application of CSM on windfarms / PV installations where only some units are modernised is not clear. The terminology “pro rata principle” is used but it is unclear how to apply this in practice. Annex 3 at the report gives an explanation only for reactive power. VGB expects that all Member States will apply the pro rata principle in a unique manner. The statement in the SO GL that characteristics of existing PGMS have to be respected, applies also in case of a modernisation of only some units of a PPM. VGB does not see how to apply the pro rata rule for the frequency or voltage range.

VGB proposes that the rules for modernisation of PPMs should specify more in detail the requirements for each characteristic mentioned in the report.