



Connection Network Code Amendments - The Necessity of procedural improvements

Conference Call
9 March 2021

Targets – Objectives

The objective of raising this problematic is to optimise the **implementation of the RfG** and improve it where necessary.

Effective **harmonisation & alignment** of existing requirements call for **transparent and strong monitoring procedures**.

The aim is therefore to review the current processes on different levels, explicitly **clarifying roles and responsibilities** of different actors, to identify procedural gaps and **improve or propose clear process**.

A focus on improving the **transparency** of the implementation process on all levels, calls for proposals on **optimizing information sharing procedures, platforms and monitoring**.

Previous Recommendations

Past presentation highlighted recommendations in 5 areas that require improvement from an industry perspective:

1. Alignment of NCs and Standards.
2. Exhaustive requirements: prevent national decisions to infringe NCs.
3. Non-exhaustive requirement: harmonise and justify.
4. Transparent implementation at national level.
5. Efficient implementation at national level (e.g. compliance).

EUTurbines was invited to develop a proposal on bases of the above recommendations. The proposal has been shared with other stakeholders and discussed in detail with VGB, which concluded in this joined presentation.

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 1

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previous ESCs
<p>Article 59 (1)</p> <p>ENTSO for Electricity shall monitor the implementation of this Regulation in accordance with Article 8(8) of Regulation (EC) No 714/2009. Monitoring shall cover in particular the following matters:</p> <p>(a) identification of any divergences in the national implementation of this Regulation.</p> <p>(b) assessment of whether the choice of values and ranges in the requirements applicable to power-generating modules under this Regulation continues to be valid.</p>	<p>Proposal to adapt existing article 59 (1): Delete “ENTSO for Electricity shall monitor the implementation of this Regulation in accordance with Article 8(8) of Regulation (EC) No 714/2009.” replace by “ACER shall monitor the implementation of this Regulation in accordance with Article 32 of Regulation (EC) No 2019/943”</p>	<p>EU 714/2009 has been replaced by 2019/943.</p> <p>Monitoring role has been moved from ENTSO for Electricity to ACER (as outlined in article 32 of EU 2019/943).</p> <p>This needs to be reflected in the text of the RfG.</p>	<p><u>Roles and responsibility.</u></p> <p>Monitoring was tasked to ENTSOE in the previous regulation. Based on Article 32 of EU 2019/943, the monitoring role has been transferred to ACER.</p> <p><u>For Discussion:</u></p> <p>Role of the European Stakeholder Committee to be considered as the focal point for Grid Code monitoring and how to formalise this role within the regulation.</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 2

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previous ESCs
Article 59 (4) Where ENTSO for Electricity or the Agency establish areas subject to this Regulation where, based on market developments or experience gathered in the application of this Regulation, further harmonisation of the requirements under this Regulation is advisable to promote market integration, they shall propose draft amendments to this Regulation pursuant to Article 7(1) of Regulation (EC) No 714/2009.	Proposal to replace existing article 59 (4): “Draft amendments to this code can be proposed according to article 60(1) of EU 2019/943.”		

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 3a

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals
<p>Article 59 (3)</p> <p>Relevant TSOs shall submit to ENTSO for Electricity the information required to perform the tasks referred to in paragraphs 1 and 2. Based on a request of the regulatory authority, DSOs shall provide TSOs with information under paragraph 2 unless the information is already obtained by regulatory authorities, the Agency or ENTSO-E in relation to their respective implementation monitoring tasks, with the objective of avoiding duplication of information.</p>	<p>Proposal to adapt existing article 59 (3): Delete “Relevant TSOs shall submit to ENTSO for Electricity the information required to perform the tasks referred to in paragraphs 1 and 2.” replace by “Relevant TSOs and DSOs shall submit and keep updated to ACER through the national regulatory authority, the information requested by ACER to perform the tasks referred to in paragraphs 1 and 2.”</p> <p>Addition to article 59 (3): “The ACER in cooperation with ENTSO for electricity shall set-up a public online tool where national relevant information is collected and accessible to all relevant parties and interested individuals. The information to be gathered are the following:</p> <ul style="list-style-type: none"> - Link to legal text - Definition of exhaustive and non-exhaustive parameters - TSOs requirements and compliance tests and process to be performed (this can consist of a link to the TSO website) - DSOs requirements and compliance tests and process to be performed (this can consist of a link to the EU DSO website) - National website - Contact mail and contact phone where requests can be posted. - Any information relevant that can be useful for any person that has an interest in the code. <p>The online tool can be used by TSOs and DSOs for eventual additional communication specific to their system. The information shall be organized to permit easy access and provide a complete usable information to relevant party including plant owners and manufacturers. Stakeholders shall be involved in developing the online focal point.</p> <p>TSOs and DSOs shall ensure the information provided is updated.</p> <p>TSOs and DSOs shall provide the requested information within two months, or in case of specific requests within a given realistic deadline, after receiving the request.”</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 3b

Explanation	Recommendation as presented in previous ESCs
<p>During the implementation Manufacturers and Plant owners struggled to access the information relevant to the new regulation.</p> <p>A single point where updated information can be accessed is needed.</p> <p>The information needs to be reliable, therefore TSOs and DSOs shall be responsible to provide and update the information.</p> <p>ENTSO for Electricity and ACER shall coordinate to provide an online focal point for the information.</p> <p>It is recommended to introduce a dedicated article, so that there is a formal obligation by the relevant parties to provide information.</p> <p>Transparent clarification on the work flow and role of actors such as the national regulatory authorities would allow for a clearer picture.</p>	<p>Single focus point for information</p> <p>A clause in the RfG could be considered to formalise a single point where information is collected and where TSOs and DSOs in Europe shall make Grid Code requirements information accessible and updated.</p> <ul style="list-style-type: none">• System Operators should have a maximum time to update the information once prepared.• This single place should host also contact information details (so that anybody can reach a reference person) allowing for exchange with experts that have a clear understanding of technical details.

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 4

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previous ESCs
Article 59 (5) NEW	<p>Proposal for new article 59 (5)</p> <p>“Stakeholders may provide feedback on the implementation of this regulation and identification of any divergences to it, supporting ACER in conducting its activities as described in article 32 (1) of EU 2019/943. ACER shall keep the stakeholders informed on the follow up actions.”</p>	<p>Article 32(1) in the EU 2019/943 should be referenced in this context.</p> <p>Relevant stakeholders shall have the formal possibility to provide feedback to ACER, which shall be formally processed.</p> <p>Penalties are mentioned in article 66 of EU 2019/943, but not referenced here.</p>	

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 5

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previous ESCs
<p>Article 59. (6) NEW</p>	<p>Proposal for new Article 59 (6)</p> <p>“Based on the experience gathered in the implementation of this regulation, ACER and ENTSO for Electricity, may propose amendments to the present requirements with focus on an efficient, harmonized and cost containing implementation of the regulation, taking into account the needs of all stakeholders in value chain involved. “</p> <p>To this end, experience gathered shall be shared with the regional coordination centre as part of their task as defined in EU 2019/943 and with the mandatory participation of involved stakeholders once a year.</p> <p>The aim is to achieve a common understanding, to harmonise, where possible, the requirements and effectively optimise the compliance process and the connection to the grid, with a focus on cost effective solutions.</p>	<p>Focus on production and compliance costs for the industry.</p> <p>Non efficiencies on the system means also to have a cost-effective industry. That means that the electrical system shall be reasonably flexible to permit lean production and lean process to prove compliance.</p>	<p>Information sharing and gathering:</p> <p>Sharing on information shall not happen only at national level. Synchronous areas should be considered, and stakeholders should be involved.</p> <p>A way to define how this could be done in practice would need to be developed.</p> <p>Any National Revision process should include all relevant stakeholders in order to ensure harmonisation of requirements. An appropriate forum and process of discussions and information sharing should be guaranteed.</p> <p>Harmonisation of the requirements</p> <p>As much as possible, harmonisation should be pursued as a target in the definition of the requirements.</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 6

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
<p>Prologue (27) “The regulatory authorities, Member States and system operators should ensure that, in the process of developing and approving the requirements for network connection, they are harmonised to the extent possible, in order to ensure full market integration. Established technical standards should be taken into particular consideration in the development of connection requirements.”</p>	<p>Proposal for adding to Prologue (27)</p> <p>The regulatory authorities, Member States and system operators should ensure that, in the process of developing and approving the requirements for network connection, they are harmonised to the extent possible, in order to ensure full market integration. Established technical standards should be taken into particular consideration in the development of connection requirements.</p> <p>Development of requirements shall be carried involving European standardisation organisations therefore permitting the evolution of product standards and, as a consequence, the adoption of the same by industry.</p>	<p>Manufacturers use quality processes associated to international recognized standard including product standard (like the IEC 60034 for generators).</p> <p>A regulation is not sufficiently detailed to lead to the definition of a product. The definition and revision of the requirements through technical standards is therefore the most efficient process to align the industry products with less impact (costs, process, quality issues, responsibilities.).</p> <p>Experience of Technical committees is also of advantage for the definition of the requirements and it shall be taken into consideration in the requirements (product standards). Wherever reasonable, references to product standards shall be used.</p>	<p><u>Use of existing and consolidated standards.</u></p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 7

Draft Amendment and Proposal	Explanation	Recommendation as presented in previous ESCs
<p>Proposal for new article 59 (x) or new article 4 (x) or both: The introduction of new requirements or amendments to the present regulation shall be regulated by an approval process. Information about new requirements or amendments to the existing regulation and associated approval process shall be publicly available free of charge.</p> <p>Proposal for consideration: “Once the new requirements or the amendment is approved, its applicability will be defined based on a timeframe that will permit the manufacturers to understand and adopt it in their new product. This time shall be coordinated among stakeholders and shall consider:</p> <ul style="list-style-type: none"> - Applicability to ongoing projects (costs for retrofiting) - Applicability to projects for which the major components had been bought (costs for retrofiting) - Time to certify the generating unit or plant (if certification process applies) - Time for a certification body to get its own approval for certifying the new requirement. - Roll-out of the requirement <p>The new requirements shall be introduced considering a minimum time of 1 year (or ??) between the date of their publication and the entering into force and will affect only installations for which major components are not ordered yet at the moment of official publication of the approved new requirements.”</p> <p>Article 4 would permit to adapt the wording on applicability to existing plants. As an alternative modification to article 7 and reference to article 4 for existing plants (which shall then be a bit adapted).</p>	<p>The introduction of new requirements has been problematic.</p> <p>The industry is facing challenges in finding the correct requirements to be implemented, timeline, process etc. This is detrimental for the market since it does not provide confidence to investors.</p> <p>A proper process shall be set in place in a transparent manner.</p>	<p><u>Timing in the introduction of the requirements and associated grace period</u></p> <p>It has been recognised that the text of Chapter 4.3 is not well-written.</p> <p>Some modifications should be considered. Specification on the grace period for compliance testing for newly introduced values is necessary.</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 8

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
Article 41 (Addition)	<p>Proposal for an addition to article 41.7</p> <p>“In the frame of compliance testing, when the system operator requires proof of compliance of specific requirements, it shall establish a procedures permitting generating units to be connected to the grid with the purpose of conducting such tests and verifications, including certification test process when requested.”.</p>		<p>It can happen to some system operator require a Declaration of conformity based on testing before permitting the connection of the generating unit to the grid. It shall be permitted to carry out compliance testing when connected to the grid in coordination with the RSO, eventually based on a preliminary declaration of conformity. This situation can cause relevant issue for generating unit for which the size or unities does not permit to be tested in a laboratory.</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 9

COMISSION REGULATION (EU) 2016/631-Article	Draft Amendment and Proposal	Recommendation as presented in previous ESCs
<p>Article 42 (Addition)</p> <p>Common provisions for compliance testing</p> <p>2. Notwithstanding the minimum requirements for compliance testing set out in this Regulation, the relevant system operator is entitled to:</p> <p>(a) allow the power-generating facility owner to carry out an alternative set of tests, provided that those tests are efficient and suffice to demonstrate that a power-generating module complies with the requirements of this Regulation;</p> <p>(b) require the power-generating facility owner to carry out additional or alternative sets of tests in those cases where the information supplied to the relevant system operator in relation to compliance testing under the provisions of Chapter 2, 3 or 4 of Title IV, is not sufficient to demonstrate compliance with the requirements of this Regulation; And</p> <p>(c) require the power-generating facility owner to carry out appropriate tests in order to demonstrate a power generating module's performance when operating on alternative fuels or fuel mixes. The relevant system operator</p> <p>and the power-generating facility owner shall agree on which types of fuel are to be tested.</p>	<p>Proposal for an addition to this article 42.2.</p> <p>“(d) allow the use of alternative or same set of tests carried out in a different facility provided that those tests are efficient and suffice to demonstrate that a power-generating module complies with the requirements of this Regulation.”</p>	<p><u>Certification, use of certificates and use of the tests already carried out</u></p> <p>Ideally, some common criteria should be developed, to optimise testing and testing procedures.</p> <p>While recognising the right to ask for specific verifications, certificates or tests carried out in different places should be recognised in different countries.</p> <p>The topic recognition of 3rd parties outside a given country should also be addressed.</p> <p>Reflection on if this recommendation should be formulated in an amendment that is an addition to Article 40 (on compliance demonstrations)?</p> <p>Our understanding is that Article 42 is valid for all provision in chapter 2.</p>

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 10

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
Article 42 5. (NEW)	<p>Proposal for a new additional point 5 to Article 42:</p> <p>“Instead of carrying out the relevant test, power-generating facility owners may rely upon equipment certificates issued by an authorised certifier to demonstrate compliance with the relevant requirement. In such a case, copies of the equipment certificates shall be provided to the relevant system operator.”</p>		

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 11

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
Article 43 (NEW) Common provisions on compliance simulation	Proposal for new Article 43 (6) “43.6 The relevant system operator shall allow the use of compliance simulation as described in article 43.2 also for Type A and Type B generating module. The provision described in art 15.6(c) are in this case applicable also to Type A, and Type B when compliance simulation is used.”	As an alternative the content of paragraph 15.6.c can be moved to Art. 13.	

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 12

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
Article 15.6. (Addition)	<p>Proposal for addition to article 15 6.</p> <p>“The relevant system operator shall cooperate and not unduly delay the verification of the model through tests.”</p>	A plant facility owner can be requested to provide compliance evidence through simulation model, which do not need a validation as mutually agreed or which need still to be validated. There shall be a process in place that permits to carry out model validation, with the generating unit connected to the grid.	

Amendment Proposals according to art 60(2) (EU) 2019/943 – Amendment Nr 13

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previously
Article 3 (NEW)	<p>Proposal for new Article 3.3.:</p> <p>To be defined.</p>	<p>A non-binding translation of the national legislation into a common language (e.g. English) is necessary. It would facilitate compliance as it gives any EU stakeholder the possibility to access and understand all relevant national requirements. Translation of the technical text from 24 official EU languages is a burden to compliance.</p> <p>Article 7 Regulatory Aspects, 3 (b/c) is touching upon this topic. A formulation and the feasibility of an amendment should be discussed.</p>	<p>Common language</p> <p>Common language could be used for harmonisation purposes.</p>

Collaboration and next steps

The proposal has been shared with **EUGINE**. The document found basic support and EUGINE is currently in discussion with its members on details, continuing the dialogue on this matter.

The proposal has been equally shared with **WindEurope** who considers some of the raised issues as matters that deserve further discussion and exchange. For this reason WindEurope is invited to look into this suggestion and give detailed feedback.

It is considered to develop further amendments in the topic of compliance and to discuss on a minimum common ground for the definition of families and variants, in the same format.

Other stakeholders are invited to join the discussion and reflection process.

Contact



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