



## **Connection Network Code: Need for procedural improvements**

GC ESC Conference Call  
17 September 2020

# Agenda

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Building on past presentations, EUTurbines would like to cover the following areas towards a discussion on a EG on various technical topics:

1. Background
2. Problem Statement
3. Recommendations towards an EG task description
4. Next steps

# 1. Background

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EUTurbines presented its findings at several occasions, sharing with other industry representatives and regularly following up within the ESC.

- GC ESC 11 September 2019 EUTurbines & EUGINE presentation: “Connection Network Code Feedback from Industry”
- GC ESC 12 December 2019 EUTurbines presentation providing detailed examples and recommendations
- GC ESC March 2019 – focus on format adaption during the pandemic
- GC ESC 4 June 2020 EUTurbines is invited to prepare a proposal for an EG on various technical topics.
- GC ESC 17 September 2020 EUTurbines introducing amendments proposal to the RfG Review

## 2. Problem Statement

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The objective of raising this problematic is to optimise and if necessary improve the **implementation of the RfG**. This requires:

- effective **harmonisation and alignment** of existing requirements
- **transparent and strong monitoring procedures**
- **Reviewing** the current processes on different levels, explicitly **clarifying roles and responsibilities** of different actors.
- identify procedural gaps and **improve or propose clear process.**
- improving the **transparency** of the implementation process on all levels, calls for proposals on **optimising information sharing procedures, platforms and monitoring.**

The core issues have been outlined at different occasions. Today's presentation focuses on **recommendations and a proposals on how to proceed towards an EG.**

## 3. Recommendations towards an EG task description

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The 5 recommendation clusters below shall give the direction for drafting “tasks description” for the EG ToR.

### 1. Alignment of NCs and Standards

- Improve participation of National Representatives of SOs in mutual cooperation/support structures between CENELEC and ENTSO-E.
- Review national requirements, aiming at harmonisation with standardisation, in view of a revision of the present implementation of the regulation.
- Ensure that studies are not over simplified regarding technology specificities. Technical Committees shall be involved in the definition of new requirements (EN, ISO, IEC, etc).

## 3. Recommendations towards an EG task description

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### 2. Exhaustive requirements: prevent national decisions to infringe NCs

- National decisions must comply with NC. MS shall notify any additions or deviations. NER must signal a deviation to SO that must request a derogation.
- Associated values/ eventual deviation from exhaustive requirements shall be recorded (e.g. indicated in the monitoring file) and subject to a transparent derogation processes, that includes reviews from stakeholders at EU level.
- Deviations should be permitted following a proper derogation process that shall include a. Technical justification b. CBA c. participation of stakeholder.

## 3. Recommendations towards an EG task description

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### 3. Non-exhaustive requirements: harmonise and justification

- Workshops: Ensure SOs participation, introducing a MS quorum.
- Expert groups: Reinforce role of EGs and dissemination of results as basis for necessary discussions.
- Consider that the requirements in the regulation are subject to review within the next 2-3 years. It is necessary to identify the entity responsible for the review process.

### 3. Recommendations towards an EG task description

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#### 4. Transparent implementation at national level

- Accountability: National grid operators to respond to EU integrated market requirements.
- Audit and structure national grid requirement portals, ensuring accessibility for all stakeholders
- National Authorities shall involve at least stakeholders participating to GC ESC.



### 3. Recommendations towards an EG task description

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#### 5. Efficient implementation at national level

##### KPI:

- English language (copy)
- Free access to Rules
- Coherent structure with NCs (RfG and beyond)

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Compliance Testing

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Certification

##### Why:

- Guarantee access for any EU stakeholder
  - Compliance must not be a question of costs
  - Avoid mis-understanding and confusion.
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- Need clear descriptions on compliance tests, with reference to the applicable rules and criteria
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- Need to clearly state whether and under which conditions a certification process is foreseen – at plant and/or at unit level and based on which requirements.

# Next steps

EUTurbines presented the problems from an industry perspective in September 2019 and developed:

- detailed recommendations as presented above
- concrete amendment proposal



## EUTurbines Contribution

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

COMMISSION REGULATION (EU) 2016/631 – Article	Draft Amendments and Proposals	Explanation	Recommendation as presented in previous ESCs
<p><b>Article 59 (1)</b> 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 <u>in particular</u> 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><b>Proposal to adapt existing article 59 (1):</b> <del>“ENTSO for Electricity shall monitor the implementation of this Regulation in accordance with Article 8(8) of Regulation (EC) No 714/2009.”</del> <b>replace by</b> “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 <del>RfG</del>.</p>	<p><u>Roles and responsibility.</u> 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><b>Article 59 (4)</b> Where ENTSO for Electricity or the Agency establish areas subject to this Regulation where, based on market</p>	<p><b>Proposal to replace existing article 59 (4):</b> “Draft amendments to this code can be proposed according to article 60(1) of EU 2019/943.”</p>		

## 4. Next steps

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### Next possible steps are:

- Circulate amendment proposal
- Development of ToR for an Expert Group on bases of todays discussion

The comments of todays discussion on the proposed elements of an EG problem statement, targets and recommendations on thematic clusters words task description should feed into the ToR draft.

## Contact

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EUTurbines – European Association of  
Gas and Steam Turbine Manufacturers

[Magdalena.kurz@euturbines.eu](mailto:Magdalena.kurz@euturbines.eu)