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ACER workshop on the NC RfG: Views from the wind industry

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More than 700 members from almost 60 countries

- Manufacturers with a leading share of the global wind power market
- Component suppliers
- Research institutes
- National wind and renewable associations
- Developers
- Electricity providers
- Finance and insurance companies
- Consultants
- Contractors

This combined strength makes EWEA the world's largest and powerful wind energy network

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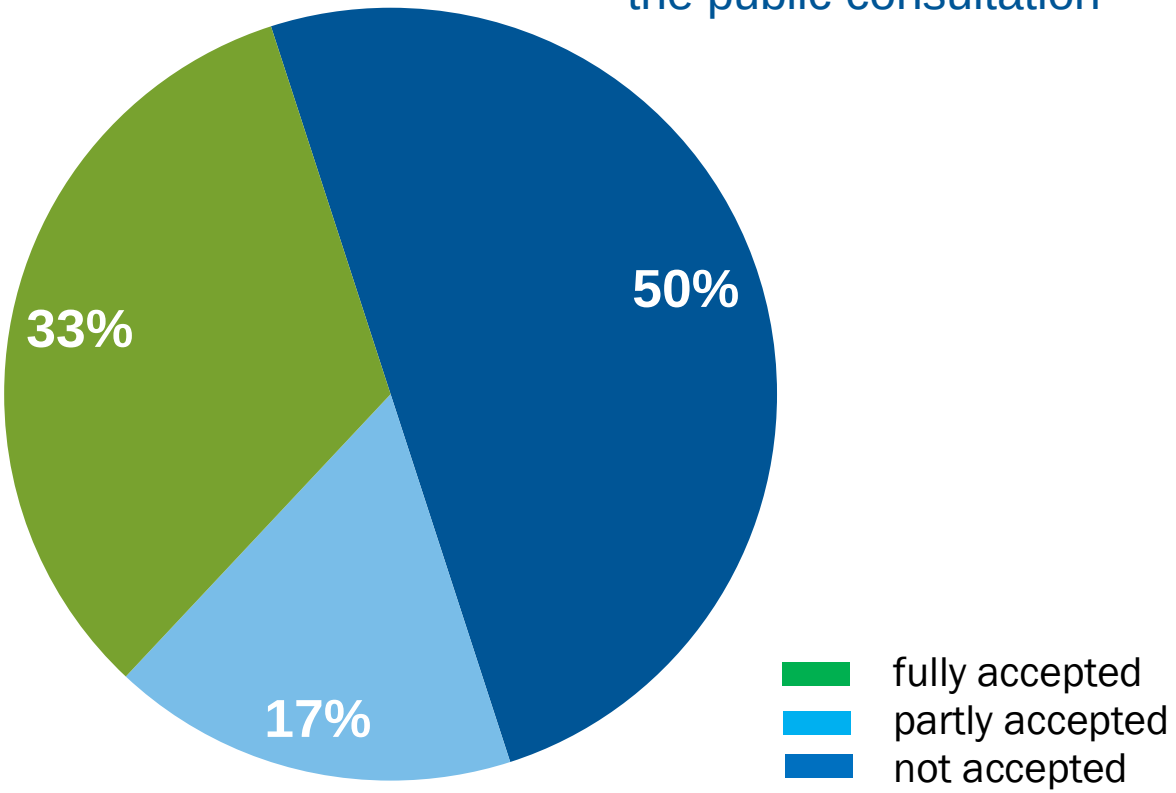
EWEA's leading members

How were EWEA comments on the NC RfG dealt with?

EWEA submitted 60 comments to the public consultation



Final NC RfG main concerns

EWEA welcomes that several of its comments have been incorporated into the final NC RfG (including last minute)

- BUT: Many remaining technical issues. There has been insufficient time for balanced response & discussions
  - Throughout the whole process
  - between end of public consultation and final NC version
- Partly due to the tight timelines that have to be met by ENTSO-E

Joint letter on 17 July from six major EU associations to flesh out the main concerns across the entire power generation sector on the NC RfG!

Final NC RfG main concerns

Non-exhaustive requirements open the door for arbitrary decisions by national TSOs via Art. 4.3 in the NC

- NRA role should be clarified, especially also in technical matters.
- Leaving a number of disputed points open for national grid operators to decide, together with the change in Article 4(3) holds the risk that national TSO's impose costly or technically inappropriate requirements on generators while avoiding cost benefit analysis.
  - e.g. steady state Q capability, Active Power recovery; 0.85 p.u. voltage recovery after fault clearance

Final NC RfG main concerns

ACER FG still not fulfilled as no CB analysis for new/extended requirements

- Especially the non-exhaustive requirements are not properly justified, in particular reactive power:

- This means, with reference to Art. 4.3. a Relevant Network Operator can request a fully rectangular P-Q/Pmax-profile from a PPM!

Why are these wide reactive power capability ranges needed?

None of the accompanying ENTSO-E documents answer this sufficiently!

Final NC RfG main concerns

Example in the justification documents: confuses ancillary service capabilities with protection schemes

- **Misleading example to compare Ancillary Services with Anti Collision Systems in air traffic.** ACS is protection system and should be compared with electrical protection in a plant to avoid equipment damage, not with capabilities.
- **<u>Better examples would be</u>**:

  -Power supply to a Telecom/IT-Network (not every telecom-customer need to provide power to the network to keep it operational)

  -Keeping roads and highways clean for motorised traffic (not every car holder needs to keep shovel and broom in his car)

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Mental exercise:

Imagine a single code for road users ....

Conclusion

Looking at process and NC contents, many remarks remain:

- Too much room for ‘arbitrary’ local TSOs decisions via Art. 4 (3) – failing proper CBA enforcement
- Requirements are still not properly justified – not technically / nor economically
- NC RfG is provided for consultation in isolation from other NC’s with which it interacts (OS/balancing)