

EG HCF - Harmonization of Product Family Grouping and Acceptance of Equipment Certificates at European Level

32nd GC ESC

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Freddy Alcazar

Extended Position for agreed proposal

Based on document „ENTSO-E_EG_HCF_Agreed outcome“

General Notes:

- A concern exists: the still open definitions and measures deemed too detailed or specific will (in theory) be shifted to an IGD; the contribution of stakeholders is VERY limited if these IGDs are in the sole ownership of ENTSO-E, which could bring similar issues as seen with some IGDs in the past
- The EG welcomed the negotiations with ENTSO-E that resulted in the proposal of an additional coordinated article on Equipment certificates
- However, based on the results as described in the overall accepted final report, some gaps still exist with respect to further measures that may contribute to an accelerated availability and enhanced acceptance of Equipment certificates, as well as to less efforts and needless barriers to the industry

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A) Different pathways to define certification requirements

- **Reason:** The EG’s final report identified different ways of defining these requirements to provide a more flexible, cost-effective and generic certification procedure while still ensuring a high quality of conformity statements
- Article 44 (1) (a) as proposed by ENTSO-E is formally restricting the certification requirement to the national grid code implementation only
- The objective is to provide the RSO with a pathway in case they MAY want to define it within their compliance scheme
- For a precise handling of the complex matter, we propose to introduce two more definitions in Article 2

[Article 44 (3) NEW]

3. Notwithstanding the provision of Article 44 (1) (a) RSOs may accept equipment certificates that provide a statement of conformity with respect to certification requirements others than the requirements at national level implemented under this Regulation according to the provisions of Article 7 (1). In such case, the RSO shall specify the acceptance conditions within the compliance scheme, as well as which additional information needs to be provided in order to demonstrate the compliance of the equipment with the established requirements at national level implemented under this Regulation.

‘certification requirements’ are the provisions applying to power-generating units, power-generating modules or components which need to be fulfilled to provide a statement of conformity as a condition of establishing or maintaining certification. These may refer to the requirements as set out in Title II, provided by a national implementation under this Regulation, by relevant recognized European and international standards and conformity assessment schemes or by alternative schemes that may also be applicable.

‘Statement of conformity’ means an attestation based on a conformity assessment that the fulfilment of certification requirements has been successfully demonstrated. The statement of conformity is provided in the equipment certificate.

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B) Option for selective certification

- **Reason:** The EG’s final report identified the option of selective certification to only part of the overall requirements as a helpful measure to accelerate the availability of certificates
- For example, the provision of FRT or LFSM certificates together with respectively validated simulation models will provide an important step within the operational notification procedure based on simulations, while the steady state behaviour might be demonstrated via onsite compliance testing
- With the existing restriction (Article 44(1) is requesting “the conformity with the relevant technical requirements”), any not demonstrated conformity due to a selection is formally a non-conformity according to ISO/IEC 17065
- The objective is to provide the RSO with a pathway in case they MAY want to define it within their compliance scheme
- IECRE has published the first and only international certification scheme on grid code compliance (IECRE OD 009). However, that scheme **is applicable to capability certification only**. It CANNOT be applied to a national grid code implementation.

[Article 44 (4) NEW]

4. The compliance scheme defined by the RSO may define as eligible those equipment certificates where the statement of conformity covers only selected certification requirements required capabilities.

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C) General linkage of the compliance scheme to the operational notification procedure

- ENTSO-E introduced the new definition of a compliance scheme, providing an important and helpful term for the overall compliance process on PGM level
- The coordinated version with ENTSO-E provided a minor amendment to Article 29 (2) which covers a linkage of the compliance scheme to the operational notification procedure, which included the statement “in the case RSO provides for the use of equipment certificates”
- In our opinion, this condition is not correct as a compliance scheme must always be provided by the RSO for the following reasons:
 - Article 29 (1) implies that the PGFO must demonstrate that it has complied with the requirements set out in Title II of this Regulation. The PGFO needs to know the scheme to apply in order to demonstrate compliance;
 - Articles 30(2) and 32(2) list several measures the RSO shall specify during the operational notification procedure to be provided by the PGFO to demonstrate compliance. In our view, the compliance scheme is the appropriate document on RSO level to define this.
- We propose to delete the condition from Article 44 (2) in the coordinated version
 2. The relevant system operator shall clarify and make publicly available the details of the operational notification procedure which shall include the compliance scheme ~~in the case RSO provides for the use of equipment certificates.~~

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D) Regulatory aspects on compliance schemes

- Neither RfG 1.0 nor RfG 2.0 provide a binding time schedule to implement compliance assessment measures on national level
- For the industry, this regulatory loophole is an incalculable risk, as it means that the commissioning of PGMs is linked to undefined preconditions and needs to be negotiated on a case-to-case-basis

[Article 7 (10); NEW]

10. The relevant system operator or TSO shall submit a proposal for a compliance scheme, for approval by the designated entity within two years from the entry into force of this Regulation. The Member State may provide for a shorter time period. In this case, the Member State shall communicate the shorter time period to the European Union Agency for the Cooperation of Energy Regulators (ACER).

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E) Additional definitions

- Some definition amendments were proposed but not taken in the coordinated version
- For completeness reasons we list them here

[definition; amended]

(46) ‘authorised certifier’ means an entity that issues equipment certificates and/or power-generating module documents and *is accredited according to the relevant internationally recognized standard* ~~whose accreditation is given~~ by the national affiliate of the European cooperation for Accreditation (‘EA’), established in accordance with Regulation (EC) No 765/2008 of the European Parliament and of the Council

(47) ‘equipment certificate’ means a document issued by an authorised certifier *based on a certification scheme according to the relevant internationally recognized standard* for equipment used by a power-generating module, demand unit, distribution system, demand facility or HVDC system. The equipment certificate ~~defines the scope of its validity at a national or other level at which a specific value is selected from the range allowed at a European level~~ *provides a statement of conformity demonstrating that certification requirements as defined on national or other level are fulfilled by the equipment*. For the purpose of replacing specific parts of the compliance process, the equipment certificate may include models that have been ~~verified~~ *validated* against actual test results

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Annex:
ENTSO-E_EG_HCF_Agreed
outcome

Article 2.

Definitions

'power generating unit' or 'PGU' means an aggregation of components converting a primary source of energy into electricity at the terminals of a unit generating electricity, which is synchronously to the network or which is either non-synchronously connected to the network or connected through power electronics.

'component' means any active element which is part of a power-generating module whose response may have an impact on the electrical characteristics and /or compliance with the requirements of this Regulation.

'PGU family' means a group of PGU from the same manufacturer with equivalent characteristics to a representative unit which has undergone conformance tests (tested PGU), in terms of electrical performance. The range of applicability of the PGU family will be defined within the compliance scheme by the RSO.

'Component family' means a group of components from the same manufacturer with equivalent characteristics to the representative component which has undergone conformance tests (tested component), in terms of electrical performance. The range of applicability of the component family will be defined within the compliance scheme by the RSO.

"Certification scheme" means conformity assessment system according to internationally recognized standards, that the RSO may include in the compliance scheme, which shall be related to PGM, PGU or components, and their fulfilment with specific rules and procedures to demonstrate compliance.

"Compliance scheme" means a compliance verification programme provided by the RSO which shall specify all evaluation and assessment measures to be taken, aimed to demonstrate the compliance of a PGM, PGU and/or components with the relevant technical requirements during the operational notification procedure for connection. When equipment certificates are applied within the compliance scheme, it shall include, or provide a reference to, a certification scheme for the equipment. The applied equipment certificates must be valid for the specific equipment installed within the PGM for which a connection request has been made.

Article 29

General provisions

1. The power-generating facility owner shall demonstrate to the relevant system operator that it has complied with the requirements set out in Title II of this Regulation by completing successfully the operational notification procedure for connection of each power-generating module described in Articles 30 to 37.

2. The relevant system operator shall clarify and make publicly available the details of the operational notification procedure which shall include the compliance scheme in the case RSO provides for the use of equipment certificates.

Article 44

Common Provisions on Equipment Certificates

1. In the case that the compliance scheme specified by the RSO provides for the use of equipment certificates issued by an authorised certifier in the context of Title III and/or Title IV, the equipment certificates shall comply with the following provisions:
 - a) Any equipment certificate shall be based on a certification scheme defined within the compliance scheme that shall be specified by the RSO. The equipment certificates include PGU certificates and component certificates. The equipment certificates shall demonstrate the conformity with the relevant technical requirements under this Regulation as of the national implementation. When the RSO decides that the evaluation methodology provided in the certification scheme may not be applicable to conclude the conformity assessment, the RSO should provide alternative methodologies for evaluation. These methodologies should, to the extent possible, be harmonised with or provide unambiguous references to established technical standards or conformity assessment schemes.
 - b) If not otherwise specified by the certification scheme defined within the compliance scheme based on which the equipment certificate is issued according to (a), the equipment certificate shall contain the information specified by the RSO as a minimum, which shall be provided to the PGM owner by the RSO upon request.
2. RSOs may accept equipment certificates, for power generating units or components, issued by authorized certifiers of Member States whose accreditation is given by the national affiliate of the European cooperation for Accreditation ("EA").
3. RSOs may accept equipment certificates for PGU and/or components which belong to a family with a range of applicability defined within the compliance scheme, that shall be specified by each RSO, under which the assessed PGU and/or component is certified.