

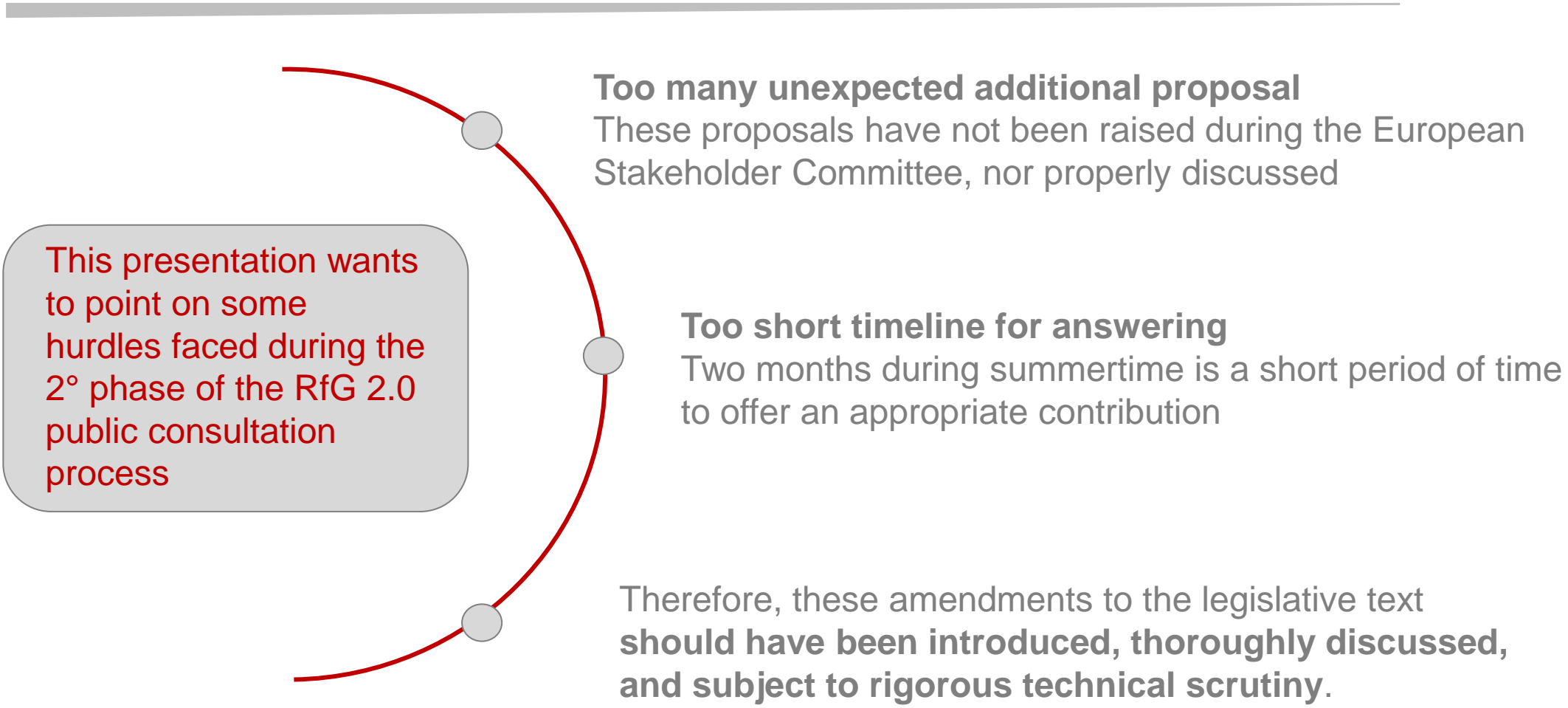


EUTurbines – GC ESC

28th September 2023



EUTurbines feedback on RfG Public Consultation





Too many unexpected additional proposal

- **These new technical proposals lack consensus vetting and detailed justifications, making them unrealistic in their current form.**
E.g. Block Signal for LFSM logics, 52.5 Hz over-frequency, 1.3 pu High Voltage Ride Through, simulation models, etc.
- Our question: **In the current regulation proposal, there is the level of details and harmonization needed?**

We seek a harmonized approach, requiring clear consensus and potentially delegating tasks to European technical committees

Immature requirements should not be integrated in the regulation

We promote improved stakeholder cooperation and information sharing.



Too many unexpected additional proposal: IGDs

- In the current proposal IGDs were the source of information for some additional requirements:
 - Currently, IGDs lack consensus (often ignoring stakeholder feedback) and are solely owned by ENTSO-E, as defined in market regulation.
 - Often, IGDs lag behind and fail to reflect discussions in various countries or the practical insights of stakeholders
 - Reference to consolidated and used technical standard (EN and IEC) would have been preferred. EUTurbines members wonder if the absence of reference to harmonized standards is due to limited accessibility to such documentation.



Too many unexpected additional proposal: RoCoF

- Discussions have not been fully efficient regarding RoCoF requirements:
 - EUTurbines members had engaged appropriate R&D budgets and resources within their companies, **but no clear specifications have been provided to proceed.**
 - ENTSO-E has not provided ever any presentation or study to be used as a basis for discussion
 - There are still too many interpretation of the phenomena to properly be assessed as requirements



Public consultation - Current process may not be effective

- During discussions, it was noted that stakeholders in some countries had not provided feedback on certain requirements.
- Conducting consultations during the summer/vacation seasons and simultaneously across multiple MSs is not deemed acceptable. Instead, consultations should be well-promoted and given a longer timeframe for consideration.
- Consultations should be better organized and presented, with the possibility of using GC ESC as a main consultation platform.
- English language proficiency is important to prevent the loss of information and is considered a must.
- MSs appear to lack awareness of specific discussions on technical limitations. EUTurbines has previously emphasized the need for structured discussions among Member States and stakeholders, especially concerning topics related to stability.
- There should be a concerted effort to gather and share information.



Public consultation - Current process may not be effective

We recommend that EUTurbines' proposal for harmonized requirements and cross-discussions among Member States should be seriously considered and appropriately implemented.

EUTurbines provided detailed inputs in its consultation reply, hence we wonder if we will be involved during the analysis process when considering our specific proposals.