



The voice of the European generating set industry



# **EUROPGEN views on SPGM definition**

May 2024

# Determination of Significance of SPGMs



ACER's proposed amendment to NC RfG, Whereas (11) states:

“ (11) The significance of power-generating modules should be based on their size and their effect on the overall system. Synchronous machines should be classed on the machine size and include all the components of a generating facility that normally run indivisibly. An installation containing a set of synchronous machines that **cannot** be operated **independently from each other**, such as combined-cycle gas turbine installation, should be assessed on the whole capacity of that installation. Non-synchronously connected..... ”

One key question arises....

If a set of synchronous machines can be operated (started, stopped, connected and disconnected/tripped) independently from each other, then how should they be classed?

– individually, or aggregated?

# Determination of Significance of SPGMs



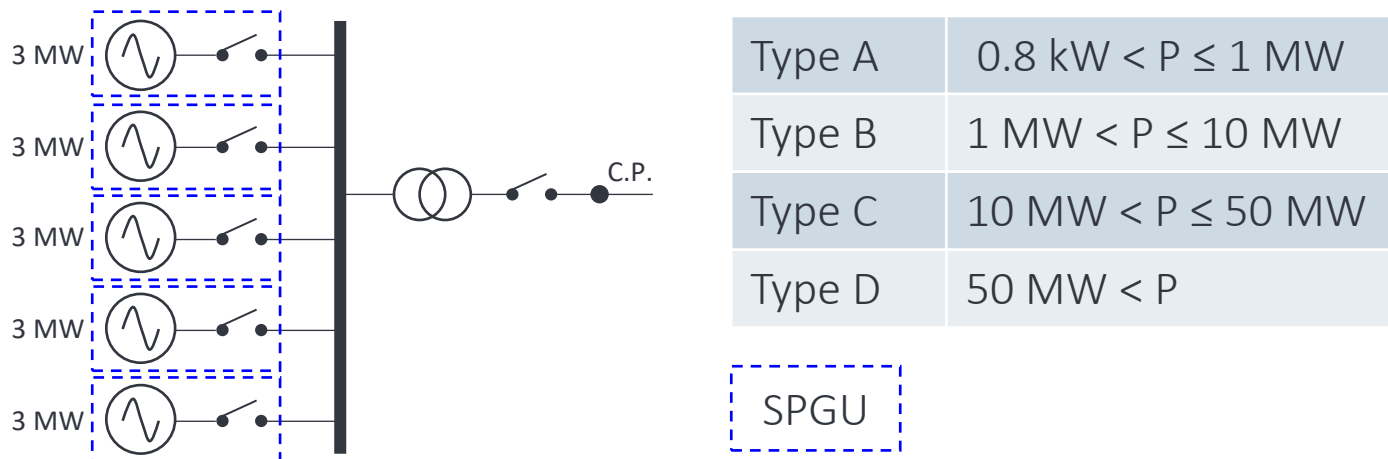
The proposed (and existing) text fosters inconsistency across Member States with different interpretations

## Why does this matter?

- If aggregation is applied, manufacturers must always design equipment to fulfil the most stringent requirements (Type D) because they cannot predict the facility size
  - **Adds unnecessary cost** to installations where the unit is considered Type A or B (oversized generators, more expensive controls, etc.)
- A unit that is designed to fulfil Type B requirements in one Member State where each SPGU is classed on its individual rating **cannot be sold into an identical application in another Member State** where aggregation is applied, as Type C may be needed
  - This is a **market barrier** and not consistent with EU market principles

# Determination of Significance of SPGMs

Example: multiple synchronous power generating units (SPGUs), single connection point (C.P.)



Each unit has its own breaker and can therefore be started, stopped, connected and disconnected/tripped **independently** from the others.

EUROPGEN interpretation: each SPGU is considered a SPGM, of **Type B**

# Proposed Next Steps



- EUROPGEN would welcome feedback from other stakeholders on the issue presented
- EUROPGEN request ACER clarify how “Whereas (11)” should be interpreted and applied to the example on the previous slide
- EUROPGEN request that the Expert Group proposed by EU DSO Entity include synchronous power generating modules within the scope of the ToR

# Questions?