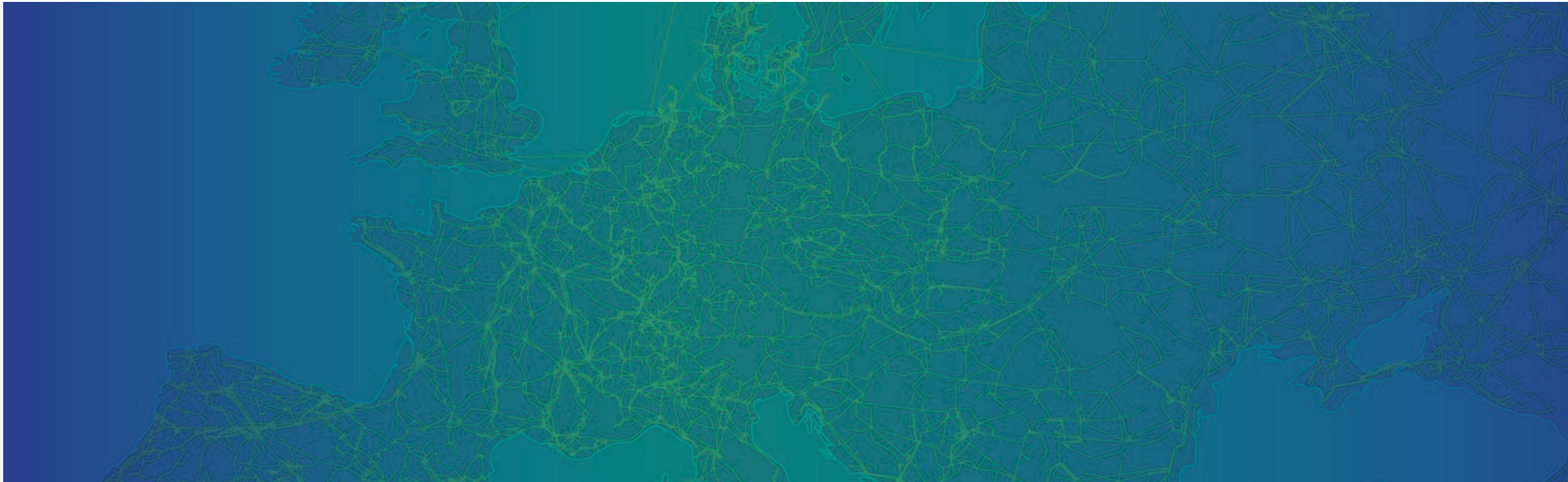


TOP.6 – Reaction to the joint industry statement on SPGMs

11 September – GC ESC in Brussels



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TOP.6 – Reaction to the joint industry statement on SPGMs

System Operators initial reaction

Regarding the SPGMs workstream, **ENTSO-E, supported by the EU DSO Entity**, would like to share an **initial reaction from System Operators to the Joint industry statement "NC RfG 2.0: Industry Call for Clarification on Aggregation Concept and Compliance Scheme"** presented at the last workstream meeting.

Initial reaction

- ❖ The **stakeholders' proposal** would **not** be **aligned** with the proposed requirements of the **NC RfG**, as the aggregation of the Pmax of non-synchronously power-generating units sharing a connection point (CP) is essential for sizing a PPM, given also that the NC RfG requirements **apply at the CP, the aggregation of Pmax is crucial for Article 5.**
- ❖ Therefore, any proposal will need to **clarify and ensure consistency between the legal provisions and the whereas sections** of the **NC RfG.**

Legal text proposal is therefore provided to support the discussion

TOP.6 – Reaction to the joint industry statement on SPGMs

Legal text proposal

Legal text proposal

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 power-generating units ~~of the same underlying technology~~, where they are collected together to form an economic unit and where they have a single connection point should be assessed on their aggregated capacity. ~~Moreover, to ensure an appropriate harmonisation or rules for mass-market products, capacities of units of different classes, for instance, photovoltaic, electricity storage, combined heat and power installations, or V2G electric vehicles, should not be aggregated for the purpose of the determination of significance.~~

Electricity storage modules integrated to a power-generating module, where the module is either non-synchronously connected to the network or connected through power electronics, used solely for the purpose of meeting the requirements of this regulation should be considered as part of such module while its capacity should not count towards the power-generating module capacity.

Legal text proposal as starting point for further discussions and improvements with the stakeholders in the ACER workstream on SPGMs