



NC RfG 2.0: Industry Call for Clarification on Aggregation Concept and Compliance Scheme

35<sup>th</sup> GC ESC

Freddy Alcazar

11th September 2024

## **Background**



### Points to Clarify within NC RfG 2.0

- 1. Modify recital 11 with two main objectives:
- clarify the issue with synchronous technology regarding units and modules; and,
- clarify the ambiguity for the aggregation rules of non-synchronously connected power generating units into a PPM or ESM.
- 2. Impose a clear timeline and responsibility to propose a compliance scheme as well as opening certification schemes and requirements as a door opener for enhanced compliance in the European power system.

### Signed by



**COGEN EUROPE - The European Association for the Promotion of Cogeneration** 



**EUGINE - European Engine Power Plants Association** 



EUROPGEN - The voice of the generating set industry



EUTurbines - European Association of Gas and Steam Turbine Manufacturers



SolarPower Europe



VAZ e.V. - Verband akkreditierter Zertifizierungsgesellschaften e.V. - on behalf of EFAC -European Federation of Associations of Certification Bodies



Wind Europe

# **Our proposal**

Recital 11



(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...

#### Change to:

(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. An installation containing a set of synchronous machines that can be operated independently from each other, such as diesel or gas reciprocating engine-driven synchronous generating units, should be assessed on the individual machine size and not the whole capacity of that installation...

# Our proposal

Recital 11...continued



(11) ... 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 underlying technology, for instance, photovoltaic, electricity storage, combined heat and power installations, or V2G electric vehicles, should not necessarily be aggregated for the purpose of the determination of significance unless so agreed between the relevant system operator and the power-generating facility owner, or determined by other appropriate means, where an agreement is not required. Also, when V2G electric vehicles and associated V2G electric vehicle supply equipment are connected to a V2G electrical charging park their capacities should not be aggregated for the purpose of the determination of significance. Electricity storage integrated to a power-generating module used solely for the purpose of meeting the respective requirements of this Regulation should be considered as part of such module while its capacity should not count towards the power-generating module capacity.

#### Change to:

(11) ... Non-synchronously connected power-generating units of the same any 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 maximum agreed export capacity as agreed between system operator and asset owner. Moreover, to ensure an appropriate harmonisation or rules for mass-market products, capacities of units of different underlying technology, for instance, photovoltaic, electricity storage, combined heat and power installations, or V2G electric vehicles, should not necessarily be can be aggregated for the purpose of the determination of significance unless so agreed between the relevant system operator and the, power-generating facility owner, or determined by other appropriate means, where an agreement is not required. Also, when V2G electric vehicles and associated V2G electric vehicle supply equipment are connected to a V2G electrical charging park their capacities should not be aggregated for the purpose of the determination of significance. Electricity storage integrated to a power-generating module, used solely for the purpose of meeting the respective requirements of this Regulation should be considered as part of such module while its capacity should not count towards the power-generating module capacity.

## Our proposal Article 7 (10) [NEW]



Ends in Article 7(9)





(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).

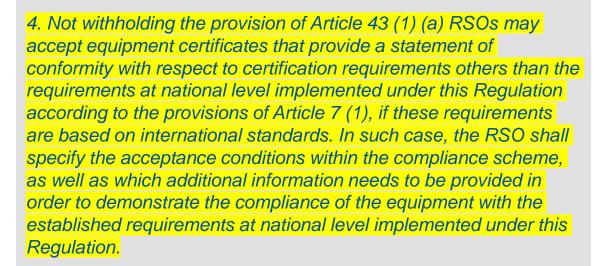
## Our proposal Article 43a (4) [NEW]



Ends in Article 43a (3)



Article 43a (4)





Thank you! Any comments or questions?