



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

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)



Change to:

Article 7

(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)



Change to:

Article 43a (4)

4. Not withholding the provision of Article 43 (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), if these requirements are based on international standards. 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.



Thank you! Any comments or questions?