

COGEN EUROPE

Towards an efficient, integrated and cost-effective
net-zero energy system in 2050



COGEN
EUROPE

European Stakeholder Committee on Grid Connection
12 March 2024, Brussels

Members

National Associations



Corporate Members



Our Mission

Cross-sectoral voice of the cogeneration industry

Work with EU Institutions and stakeholders to shape better policies by:



Building a robust evidence-base demonstrating the benefits of cogeneration.



Using the expertise of our membership.



Establishing strong coalitions and partnerships.

COGEN Europe feedback on ACER RfG Recommendation to the European Commission I

1

More time for stakeholder discussion required

- *RfG revision includes significant additional measures with major impact*
- *EG recommendations, developed over 2 years, not fully considered in the original ACER draft*
- *Majority of stakeholder comments not addressed, without the opportunity for a follow-up discussion on potential alternative solutions*

2

Adequate implementation timeline

- *Appropriate timeline for the introduction of requirements, allowing enough lead time for manufacturers to sign new contracts based on published/well defined requirements*

3

Proposals for new/additional/extended requirements should be accompanied by alternative approaches or flexibilities

- *Grid forming → More time required to assess impacts and agree on optimal implementation*
- *Fault Ride Through for Type A → Not aligned with EU standards on gas appliances*
- *Active Power Response → Alternative approaches required, recognition of different capabilities depending on technology*

COGEN Europe feedback on ACER RfG Recommendation to the European Commission II

4

Implementation Guidance Document: only if stakeholders inputs are properly considered in the document; avoid risk of loophole in the regulation

5

Harmonization of requirements: mandatory, non exhaustive requirements shall be reasonably defined to get a minimum level of harmonization, too much level of freedom would not work toward a safe and reliable system

6

Frequency related requirements shall be in line with present status. Higher values may create unsustainable costs and risks for the safety of the electrical system

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