

Remarks of PSE Operator S.A. to the ERGEG consultation paper entitled “Pilot framework guidelines on electricity grid connection”

PSE Operator S.A. welcomes the ERGEG consultation on “Pilot framework guidelines on electricity grid connection” (hereinafter “Pilot FG”). Below we answer some questions for consultation.

Question 3

Should harmonization of identified issues be across the EU or, perhaps as an interim, by synchronous area?

The harmonization of rules and technical requirements should be conducted at the level of synchronous areas, not all EU. Only for specific issues such coordination can be introduced for the EU level. Due to differences in systems’ characteristics common solutions can cause that too general requirements will be determined (interpretation will be adapted for needs of individual synchronous area) or too precise requirements (but not taking into account the needs of individual area) will be determined. Such situation can bring to risk of not to safeguard the operational security.

Question 4

Should the requirements apply to existing grid users? How should it be decided? To which existing users should the requirements apply? How should timelines for transitional periods be set? Who should bear any costs of compliance?

In our opinion new requirements should be applied only to new generation units. Current requirements defined by individual TSOs (in the framework of ENTSO) ensure the secure work of synchronously operated systems. New, coordinated requirements should ensure the security of system operation having in view new challenges in the future. Applying these new requirements for existing generators could be result in additional costs related with process of adaptation. There is not justification for implementation them for generation units, for which expected time of operation is shorter then 5-10 years.

Furthermore it is worth to mention, that as a result of network codes the new requirements in some issues can be less restrictive than current requirements of individual TSOs. It can result in limiting technical capacities of generation units.

The costs of adjusting should be incurred by parts generating them:

- TSOs – cover the costs of adjusting to the legal regulations (and potential costs of renegotiation of issued connection terms) and another costs related with adjustment of grid operation after enforcement of network codes,
- generation units – costs of adjustment to the new requirements when new regulations cover also existing generation units.

In case when new requirements apply to existing generation units – process of identification the degree of fulfillment of these requirements should last about 42 months. Time of adjustment should be determined by TSO/DSO and generation unit individually, taking into account the technology of generation and individual determinants.

In case when new requirements apply to new generation units (assuming that as the new generation unit we treat units without concluded connection agreements) transitory period should enable verification and adjustment the legal regulations to the new EU legislation. This process should last about 36 months.

Question 6

Is it necessary to be more specific regarding verification, compliance and reinforcement?

There is not the need of more precise or additional defining the issues concerning testing and verification of meeting the requirements by new generation units connected to the grid.

According the Pilot FG, apart from Commissioning there is anticipated the Compliance Monitoring, as the process independent of Commissioning. This process is carried out in the scope of coming into operation of new installation.

According to the Pilot GF, Compliance Monitoring is the tool of the identification of the level of fulfillment the requirements by existing generations and defining for them the transitory period for achieving applicability to new requirements. It is worth to underline, that in the scope of Compliance Monitoring also technical capacities of “new” generators can be verified.

That is why we propose to precise logical relations between Commissioning and Compliance Monitoring, to avoid ambiguity in interpretation of these two processes.

We assess rules presented in Pilot FG as sufficient to define in network codes the way of verification of fulfillment the requirements by the generation units.

General question

According to the Pilot FG, network codes should identify and define minimum requirements. The meaning of “minimum requirements” should be unambiguously explained.