

To the attention of:  
Ms Barbara Vest  
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09 July 2012

**Subject:** your letter “Network Code - Grid Connection Requirements for Generators (RfG)” of 5 July 2012

Dear Ms Vest,

Thank you for copying your letter of 5 July regarding the concerns of the Joint European Standing Group (JESG) in respect of the Requirements for Generators (RfG) Network Code to me. Your letter raises some important points which I would like to address and clarify.

Let me firstly say that we appreciate the considerable input which JESG members have provided on the RfG Network Code and on the other codes which ENTSO-E is currently developing. As you also point out, ENTSO-E has been improving its processes for this and other codes that are currently being drafted and we welcome proposals from all interested parties about ways in which the consultation processes can further be improved. I note that ENTSO-E’s consultation manager will attend the next JESG meeting, which I understand will be held on 17 July, and will be pleased to have a discussion regarding these issues.

We are aware that some stakeholders point out that the 6 and 12 month period given by the 3<sup>rd</sup> package to ACER and ENTSO-E respectively for the finalization of the framework guidelines and the corresponding network codes is short. While ENTSO-E understands this point of view, this timescale also obliges ENTSO-E, ACER and stakeholders to manage the consultation process in the best way possible in order to provide network codes which are technically complete and fully consulted, taking into account the enormous challenges our power systems are already facing today.

Actually, in the given 12 month timeframe, numerous stakeholder meetings and workshops have taken place complementing the 8-week web-consultation phase of the Network Code RfG. The results of this common effort are documented in the extensive report made available by ENTSO-E on the comments received and the further explanatory documentation delivered together with the Network Code. It is natural that stakeholder concerns remain on issues where opinions diverge and ACER will need to exercise judgment based on the comprehensive package ENTSO-E will deliver on 14 July.

Throughout the 11 months given to ENTSO-E for developing the RfG Network Code (and the Pilot period since end 2009) we have sought to follow an open and transparent process to ensure that we fully understand

the views of stakeholders and to ensure that we explain to stakeholders how comments have been taken into account. The stakeholder group meeting (SHG meeting) on 28 June was to achieve the second of these two purposes as we felt it was important to provide stakeholders with an opportunity to consider the Network Code and explanatory documents as a package and to give us their views on the final deliverables.

Since the first day, it is our expectation that Associations of stakeholders present in the User Group are able to adequately represent the views of their members from across Europe. Should this not be the case, this issue deserves special attention from ENTSO-E, ACER, EC and stakeholders now and in the future.

As you mention, there was an unfortunate incident in which one JESG member was unable to participate in the SHG meeting on 28 June. The confusion resulted from it being unclear to ENTSO-E whether this JESG member, *who had not been nominated as a member of this group*, was actually representing an Association member of the stakeholder group. We regret the fact we were not able to directly talk to this JESG member on the day of the meeting in order to try find a pragmatic solution; therefore we would like to apologize to him and JESG and reassure you that measures will be taken so as to avoid such issue in the future.

The process that ENTSO-E has followed in developing the RfG network code (and in working on the Pilot Code before this) has provided interested parties with considerable opportunity to provide views and I can reassure you that all those comments have been taken into account. A frequently raised comment has been the need to further research the requirements for HVDC connected generators, which led to our decision to tackle this issue separately. The SHG meeting on 28 June confirmed that this change serves the purpose of maximizing the effectiveness of the RfG code as well as ensuring a swift implementation so as to maintain the high reliability customers are expecting from the whole European power system. Therefore, ENTSO-E maintains its conclusion that the network code has significantly improved during the process and should not be further delayed.

I would be very pleased to discuss the points raised in your letter further.

Yours sincerely,



Konstantin Staschus  
Secretary-General

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