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4<sup>th</sup> July 2012

Dear Ms Bernaerts

**Network Code - Grid Connection Requirements for Generators (RfG)**

A Joint European Standing Group (JESG) has been established in Great Britain to facilitate information sharing in respect of the electricity Network Codes being developed by European Network of Transmission System Operator for Electricity (ENTSO-E). The JESG provides a means for National Grid Electricity Transmission plc (in its role as National Electricity Transmission System Operator) to discuss with members representing GB interested parties the various Network Codes under development by ENTSO-E.

Since being established just over a year ago we have held 12 JESG meetings, some of which have focussed on the technical aspects of the draft Network Codes in detail. We attract a wide range of GB members including those who are generators from a wide range of technologies, suppliers, consumer representatives, Distribution Network Operators and other GB Transmission System Operators (GB TSOs) who are members of the ENTSO-E. The link below will take you to the National Grid JESG webpage should you require further information relating to the work of the JESG<sup>1</sup> or who attends the meetings.

I am writing to you today as Chair of the JESG to bring to your attention concerns expressed by industry JESG members<sup>2</sup> at our last JESG meeting in relation to the RfG Network Code which I note from your letter of 29<sup>th</sup> June 2012 is now due to be submitted to ACER on the 14th July 2012.

JESG members were very uncomfortable with the fact that the RfG Network Code could be submitted to ACER without the opportunity for industry and consumer representatives to comment on the final draft produced by ENTSO-E, beyond the user's group meeting of 28<sup>th</sup> June, particularly given the significant amount of changes to the final version of the NC RfG. Some of the changes to the structure and definitions have led to new interpretations of the NC RfG with substantial effects. For example, changes to fault ride through could now be interpreted to apply inside a power plant

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<sup>1</sup> <http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/workingstandinggroups/JointEuroSG/>

<sup>2</sup> Excluding National Grid

module or directly at the terminal of a synchronous machine. Offshore code requirements now only apply to AC connections rather than HVDC connections which will be set out in a separate code. This leaves offshore projects considering HVDC technology with massive uncertainty in relation to the technical requirements with which they will need to comply.

It appears strange that the final opportunity for stakeholder comment on the suite of Network Codes being developed by ENTSO-E should not include the opportunity for those who are to be directly impacted by those codes provision to comment on the final ENTSO-E proposals. We note that the ENTSO-E user group meeting on the 28<sup>th</sup> June which was published on their website was only open to trade associations. This is unfortunate given that one JESG member registered for the event but was turned away at the door.

The ENTSO-E statement of 3<sup>rd</sup> July 2012 clearly states that the RfG Network Code, which was unanimously approved by the ENTSO-E General Assembly on the 26<sup>th</sup> June 2012, has 'improved' significantly since the web-based public consultation ENTSO-E conducted from 24<sup>th</sup> January to 20<sup>th</sup> March 2012 (which many JESG members responded to). JESG members strongly support being provided with an opportunity to comment on the final ENTSO-E version of the RfG Network Code as they believe that the provision of views from stakeholders, from across all Member States, will better inform ACER (and the National Regulatory Authorities) in their deliberations on the ENTSO-E final draft of the RfG Network Code.

We therefore ask DG ENER to request a formal stakeholder consultation on the final ENTSO-E version of the RfG Network Code once it has been published (on the 14<sup>th</sup> July). I would suggest a short consultation, with views submitted directly to ACER, be conducted perhaps 14<sup>th</sup> July to 28<sup>th</sup> August 2012. Many stakeholders previously had concerns about the restrictive nature of the electronic consultation process, and we would welcome an open stakeholder forum with stakeholder presentations to accompany this consultation.

I would also wish to note that Article 10 of the EU Electricity Regulation No 714/2009 requires consultation in the development of the Network Codes. While ENTSO-E has taken steps to comply with Article 10 requirements, we believe that there is a question as to whether this has been done within the spirit of the law, or whether it has been more akin to "going through the motions."

If you should require any further information then please do contact me on either 0207 930 9390 or +44 7736 107 020.

Yours sincerely

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(Correspondence by email)

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