

Network Code for Requirements for Grid Connection applicable to all Generators (RfG)

Progress Update to JESG
19th March 2013

Recap

- As the first Code, RfG has pioneered the process...and definitions are expected to be used in other Network Codes.
- Significant complications for application within GB, especially regarding new categorisation of users.

(replacing Large, Medium & Small Power Station classifications with A (800W to 1MW), B (1MW to 10MW), C (10 to 30MW) and D (larger than 30MW or connected at or above 110kV))

Power Station size (SQSS definition)	Direct Connection to:		
	SHET	SPT	NGET
Small	<10MW	<30MW	<50MW
Medium			50-100MW
Large	10MW+	30MW+	100MW+

- Generally, strong alignment with existing GB codes

Code Development Process...reminder

- Final code submitted to ACER 13 July 2012.
- GB stakeholder workshop held 2&3 August 2012.
- ACER workshop held 3 September 2012.
- ACER review of code published 13 October 2012 (opinion of how code meets Framework Guidelines). Generally positive with 4 areas identified for improvement:
 - Significance test for small scale units
 - Insufficient justification for:
 - Deviation from existing practice with regards to Fault Ride Through requirements;
 - Exemption of CHP units (proposal that the exemption should be extended to cover heat as well as steam);
 - Amendments required to national scrutiny for those elements to be determined on a national level (to ensure appropriate oversight and clarity of requirements);
 - Recovery of costs incurred by TSOs and DSOs (not required in the Network Code and should be deleted).

Status of issues raised in ACER Opinion

- Significance test - Addition section drafted to allow exemptions for new technology with a cumulative national limit.
- Deviations from existing requirements:
 - (a) FRT for Type B – Required for frequency stability; difficult technical issue. Position finalised. To be further addressed during national implementation.
 - (b) Exemptions for CHP units – Agreed and closed.
- Article 4 (3); determination of T&Cs in accordance with national law - Looking to pursue preparatory national processes in parallel with Comitology. References to art 4(3) analysed and amended. EC have stated that art 4(3) is likely to be one of those that they will be addressing during comitology.
- Cost recovery – Importance of retention stressed by DSOs. Follow CACM precedent to retain article.

Latest Progress

- Public information session held by ENTSO-E 7th March 2013
- ENTSO-E reissued revised RfG code in response to ACER's opinion 8th March
- ACER to issue updated opinion – end March / first week April
- EC Comitology stage 1 already started (assumes positive ACER opinion)
- EC effectively now 'have the pen'.

Comitology Process (EC targets summary)

- Technical translation by consultants (DNV KEMA/COWI) EC March-June:
 - ENTSO-E drafting team - comitology preparation meeting with DNV KEMA 24th April
 - Further stakeholder input will also be required
- Draft Impact Assessment by EC - June
- Final IA by ACER- July/August
- Stage 2 Comitology (the political part): Aug-Dec 2013
- Target code enacted Dec 2013

Messages from EC on next steps

- Legal ‘cleaning’ and aligning to take place– could merge RfG and DCC
- Extensive engagement of EC legal expertise
- Consultants engaged to carry out technical assessment – will contact stakeholders
- Format of further stakeholder involvement undecided but unlikely to be through user groups/workshops
- Drafting team involvement is still envisaged – further clarity required.
- Comitology may open max 2-3 issues on which more evidence is requested.
- Network codes are ‘moving targets’ (slim kind of legislation) with frequent revisions envisaged.

Messages from EC specifically to stakeholders

- Choose your battles
- Come with costs and figures, not with complaints
- EC needs quantified information
- Any change needs good arguments to change conclusions

GB Application / Implementation

- ENTSO-E initiating preparatory study on national implementation.
- GB parties (NGET, Ofgem, some DSOs) have been working on RfG application options – to present back to April JESG.