

The Hungarian distribution licensees summarise their views on the consultation document published by ERGEG as follows.

In principle we support the initiative of the European regulator to modify the EN 50160 standard. The standard on voltage quality must provide clear guidelines for both the network operators and the users of the grid, in order to determine or control the quality of the expected or provided services. We accept that the quality level set out by the standard does not mean a downgrade in a given country compared to the actual quality level and it should not imply an instant improvement pressure on the distributors either.

We would like to comment on some of the recommendations. (References are made to the items of the consultation document.)

#### **4.2 Limits of Voltage Fluctuations**

According to Figure 2, the significant decrease of the averaging time in itself can reduce the voltage appropriateness. Voltage values which are 100% appropriate with 10 minute averaging time would not necessarily be appropriate with 1 minute averaging time. Thus simultaneous abolishment of the closing provision regarding the 95% of time would lead to quality deterioration in this way, even at the existing best service quality levels. Thus we consider the simultaneous modification of the two parameter neither appropriate nor justified.

The deletion of the closing provision regarding the 95% of the time also raises questions regarding extraordinary operational situations and extraordinary circumstances. An extraordinary operational status established for the duration of eliminating a grid outage, although with somewhat reduced quality characteristics, can still ensure power supply. It would not be wise to fully abandon this option, but we accept, that this must be regulated.

#### **4.5 Considering Rights and Liabilities of the Affected Parties**

We agree with the proposed principles. In our opinion, it is important to emphasize, that the specification, tightening of the quality related stipulations can not be one-sided. Voltage quality parameters are significantly influenced by the consumers and the installed appliances. Thus distributors must have the option and ground to take actions against consumers – producers operating inadequate equipment significantly compromising quality, so as to make them to comply with the rules of co-operation.

#### **4.6 Introducing Value Limits for Voltage Events**

Accepting the intention of the regulators regarding the introduction of value limits, we would like to point out that voltage collapses are caused not only by faults occurring on the distribution network but also by those occurring in consumers' appliances. When determining the value limits for voltage events this must be taken into consideration and proper measures must be taken. This can be done similarly to Table 2, allowing for local and grid characteristics.

#### **4.7 Concept of Power Quality Contracts**

The development of power quality contracts can be a means for managing specific quality expectations. However, its wider application poses a theoretical question, which affects the applications of the principles of anti-discrimination and proportionate financing. Such a question is, how would the existence of such a contract affect those additional consumers, benefiting from the higher quality power supply provided for the requestor? Is it just to have the requesting consumer pay all cost and can the other consumers be obliged to pay higher fees?

#### **B) Specific Issues**

- 1) When defining the responsibility distribution curve, one must observe that voltage collapses are not caused only by faults on the distribution grid but also by faults in consumer equipment. The duration of voltage collapses depends on the duration of repair, thus it heavily depends on the local conditions, grid characteristics, consumer equipment and the operation of protections.
- 2) In our opinion the reduction of the voltage fluctuation range ( $U_n \pm 10\%$ ) in itself does not improve the perceived quality of the customers. In this respect only the actual measurable fluctuation range is important, the limitation, reduction of this is just as important as the tightening of the tolerance range.
- 3) In our opinion the abolishment of the 95% of the time rule makes it necessary to cover the handling of accidental deviations and extraordinary events in the scope of the regulation. It is important, that in many cases weather conditions, especially the gale force winds, do not cause direct but rather indirect damages to the grids, typically damages to networks are inflicted by fallen trees and washed debris. This is important for the distributors with regards to the interpretation and identification of extraordinary weather conditions.

In addition to weather related events the handling of extraordinary network situations and operational statuses is also crucial to the distributors. The principles applied for the design and scaling of such networks usually build on the expectation management of the existing regulations. The abolishment or significant tightening of those would imply significantly larger investments and worsened cost efficiency for the distributors.

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On behalf of the Hungarian Electricity Association as distributors

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