

**Position Paper of CEZ, a. s.  
on the Draft Guidelines for Good Practice on  
Electricity Grid Connection and Access**

<b>CEZ persons responsible</b>	
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## I. Introduction

CEZ, a. s. (hereinafter referred to as “CEZ”) welcomes the opportunity given by the ERGEG to all interested parties to comment the text “Draft Guidelines for Good Practice on Electricity Grid Connection and Access “ within the Public Consultation process.

In this paper, CEZ has answered the questions published in the text.

## II. Specific comments of CEZ

*1. Do you agree with the problems these GGP are trying to solve – are there other problems that should be addressed within grid connection and access not yet included in these guidelines?*

We welcome the idea of standardized guidelines for grid connection and access. Nevertheless at the moment it is hard not know if any other problems occur – GGP implementation in practice will show if any aspects are omitted.

*2. Do these guidelines address the problem - will they lead to more transparent, effective and non-discriminatory grid connection and access?*

We strongly feel the necessity to emphasize the differences in starting conditions for GGP implementation in separate member states; not only as to technical properties and operating procedures but also restrictions given by the actual legislation.

*3. Please outline your views on the description of the roles and responsibilities set out in Section 3.*

3.4.2 We recommend to be careful as to the publicly available data about the grids as well as those provided individually for specific purposes – considering also valid legislation.

*4. Are the technical framework and general provisions for generation, consumption and DSOs relevant and practical? Is there anything else that should be included / excluded? (Sections 4&5).*

The technical framework and general provisions for generation, consumption and DSOs can be taken as relevant and practical; the majority of these provisions have been implemented in every well-operated system. However in some cases there can occur discrepancies between whole-hearted rules and actual reality – e.g. renewables not included in GGP. Growing amount of preferential connection applications for renewables can lead to the pressure on real grid capacity. Our comment arises from the extreme raise of regulatory burden that could endanger improper grid operation.

4.3.1 Instead of harmonics emissions we prefer to use flicker (quick changes in voltage).

5.1.2, 5.2 We recommend to quote links to the relevant standards (e.g. EN 50160, EMC standards), to take into consideration valid, elaborated od prepared EN and IEC standards (e.g. for connecting the sources) as well as CIRED and CIGRE results.

5.2.1.2 We do not agree with the requierement to have the generator reactance as low as possible; it is necessary to consider also fault currents – short circuit resistance of the equipment and collective remote control signal influence.

5.3.6 Periodic testing is very important; DSO however must be legislatively given the power to execute it.

5.4.2.2 Strict prohibition of the reactive power flow between TSO and DSO networks can result in the cost growth both in TS and DS.

*5. How would the implementation of these GGP affect your business / market – what would the impacts be?*

We as DSO await that the implementation of some GGP chapters will will result in single cost-raise. See the answer to point 4 as to the preferential connection of renewables to the networks; it can be considered as a strong market deformation and the first signals can be detected just now

*6. We note that respondents to the consultation on the Implementation of the 3rd Package asked for certain areas, such as priority access for renewables, to be dealt with by ERGEG GGP. Priority access has not been covered by these particular guidelines, however, regulators welcome further input on this and other relevant issues.*

Please see our answer to the point 4.