

Mrs. Fay Geitona  
Secretary General  
Council of European Energy Regulators (CEER)  
Rue le Titien, 28  
B 1000 Bruxelles

Your correspondent :	Your references	Our references	Date
Koen Wouters		0428/21022007	21.02.2007

Concerning: Comments on the public consultation paper ‘Towards voltage Quality Regulation in Europe.’

Dear Madame,

Synergrid and its members, the Belgian distribution grid operators and the Belgian transmission system operator, are following the Voltage Quality issues for a long time.

The experiences of Synergrid are:

The European standard EN 50160 has created a good framework and harmonisation for the follow up and monitoring of Voltage Quality problems and the development and use of adequate electrical equipment and installation. Its diversity in national criteria would undermine this framework and harmonisation of equipment (loads and generation equipment like cogeneration, wind turbines and photovoltaic installations)

Voltage Quality complaint procedures are well developed. These procedures encourage steps to identify the cause of the complaint. It is very important to analyse the possible problems because a solution must be found at a reasonable cost and in an appropriate place (customer installation and protection against disturbances, network change).

In our opinion, there is no evidence justifying the need to change limits in standards like EN 50160 or to change measurement principles due to unmet requirements of the customers.

The Belgian network operators put a lot of energy into implementing international technical documents, especially in the field of the “disturbing” installations (loads and generation) in order to prevent any eventual degradation of the Voltage Quality (flicker, harmonics and voltage variation).

Voltage dips however will always occur and this on a stochastic base: limiting the number of voltage dips is in most cases extremely difficult or costly. Introducing limits and responsibilities in this area does not change the nature or the prevention of these phenomena. Often there is a lack of know how to cope with small voltage dips. An appropriate

“immunisation” of the equipment and the process systems is a key success factor in the long term consideration of the customer’s interests.

Expert groups and technical commissions on an international level are very important to evaluate eventual changes in standards, definitions and measurement criteria. They should continue their work step by step in order to reach balanced solutions for every party and this with the best added value for society.

Please note that the above-mentioned standpoints and comments are not exhaustive. The lack of Synergrid's reaction on certain standpoints, analyses, recommendations and conclusions of the ERGEG paper cannot imply its acceptances of these standpoints, analyses, recommendations and conclusions. Synergrid reserves the right to make further comments and standpoints in the future than those set out in this letter and to further develop or refine the comments and standpoints already explained.

Yours faithfully,

Ferdinand de Lichtervelde  
Secretary General