

The Association of Norwegian End-users of energy

Asker, Norway
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European Regulators' Group
for Electricity and Gas
28 rue le Titien
1000 Bruxelles
Belgium

Comments on the Public Consultation Paper Towards Voltage Quality Regulation In Europe

'Norske energibrukeres forening', The Association of Norwegian End-users of Energy is a national association for professional consumers of energy in private and public sectors. This association has for many years been a profiled spokesman for a better quality on the delivery of electricity to consumers. This statement is based on feedback from our member companies, as well as a developed understanding of the future needs and advantages of a safer electricity supply.

The Association became a bit surprised when got the information about the actual European regulations on the deliveries on the supply of electricity. It is hard to understand that these regulations represent a basis for a good industrial practice and societies needs in 2007 .

We studied with interest the seven proposals in the EREG to CENELEC for revising the EN 50160.

We will just give some brief comments:

1. There are some voltage quality parameters whose measurement rules and definitions should be better defined, searching for the widest international consensus as possible.

We see the proposal as a wise policy for the European work. At the same time we will stress the need to preserve better national standards where such are defined.

2. Limits for voltage variations – Avoid "95%-of-time" clause and avoid long time intervals for averaging measured values.

We would like to underline the need for continuous and good quality in the delivery of electricity. In most of its use, the quality can be considered as a lack of short time deviations from the generally defined delivery quality.

3. Limits are needed for every voltage level: high voltage and extra-high voltage levels should be considered in the renewed standard.

We will support this proposal, because we understand that a good quality of delivery is important for the energy intensive industries. At the same time we are sure that the

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quality standard should include the whole national grid. A better quality in the high end will probably mean a more stable quality also in the other parts of the transmission system.

4. Indicative values given in EN 50160 for voltage events are too vague, and no longer acceptable. As a preliminary step, dips and swells could be classified by severity.

We agree to the statement. In a world of modern technology the traditional standards are often too loose. We know this from actual experiences among our members.

5. Duties and rights of all parties should be taken into account.

We believe that good quality very often is a result of conscientious and systematic work of many participants. In a complex system like a national electricity grid the need for cooperation is obvious.

6. Realistic and event differentiated voltage quality levels should be defined according to network characteristics.

We will support this statement and underline the fact that a harmonization shall not mean an adaptation to lower standards.

7. The concept of "power quality contracts" should be developed

Some consumers have needs for higher standards than most of the others. It is important to develop a general contract which can take care of the needs for these special groups. A general rise in the total standard is often not efficient in view of the economy of the total society.

We accept the fact that higher delivery standards from the transmission network may mean higher costs. At the same time we will focus on the fact that higher standards can be very profitable investments for the society. The need for higher investments must continuously be balanced towards costs, and we will stress the need for selecting the cost effective investments and measures.

We believe that the work for better delivery standards has to follow two different tracks. It is important to develop good standards for the common European society. At the same time it is important to continue the national work for better performances. Different needs and different quality standards in the European nations today, gives arguments for this two track-policy.

Arne Kjeldsen (signed)
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