

## Towards Voltage Quality Regulation in Europe (ERGEG Public consultation)

Comments from :

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General	<p>A list of recognized normative references should be provided.</p> <p>As indicated in the document, EN50160 is often more descriptive than prescriptive. Nevertheless, it has to stay in line with the EMC Basic Publications which are the reference for the EMC standards that govern the relationship between equipment and between equipment and supply system. The EMC community has published many basic standards, guides, technical report giving valuable information. They should have been considered, specially :</p> <ul style="list-style-type: none"> <li>▪ IEC TR 61000-2-8 : voltage dips and short interruptions on public electric power supply systems with statistical measurement results,</li> <li>▪ IEC TR 61000-2-14 : overvoltages on public electricity network,</li> <li>▪ IEC/EN 61000-2-2 : compatibility levels for Low frequency conducted disturbances and signalling in public LV power supply systems,</li> <li>▪ IEC/EN 61000-2-12 : compatibility levels for Low frequency conducted disturbances and signalling in public MV power supply systems)</li> </ul> <p>As equipment is generally not connected to the system but to an installation. It seems also not possible to deal with the issue without any reference to installation standards (for LV : IEC/EN 60364).</p> <p>IEC 60038 (standard voltages) is also a basic standard.</p>
4	EN 50160 is a European Standard, result of a recognized standardization process, expressing a consensus between stakeholders. If not explicit, the consideration of costs and benefit of the requirements should be regarded as implicit.
4.1	I fully support improvement of definitions and measurement rules provided it is in line with the international standards. In case of new definition or disturbance/interference not covered adequately by existing standards (rapid voltage change ?), the documentation and proposals should be offered first to the EMC community (IEC SC77A) so that rules insuring compatibility are established.
4.5	<p>If “Rights and Duties” means legal responsibilities of the parties, it should not be placed in a standard. Additionally, they are already defined by the EMC Directive for disturbance and Low Voltage Directive for damage to LV equipment.</p> <p>If only the technical aspects are addressed, the collection of EMC standards is already at least a part of the response by defining immunity, compatibility and emission limits for equipment and installations.</p>
4.5 Fig 6	Immunity is more complex than a simple limit. In EMC standards, research of optimum leads product committees to define performance criteria (A,B,C) depending on the specificity of the product and the severity of the disturbance.
7.b	<p>ITIC curve is mentioned at many places in the document. Nevertheless, that curve addresses only a family of products and, additionally, should not be used without its application note. It is available at <a href="http://www.itic.org/technical/iticurv.pdf">http://www.itic.org/technical/iticurv.pdf</a> , its scope reading :</p> <p><i>“The ITI (CBEMA) Curve and this Application Note describe an AC input voltage envelope which typically can be tolerated (no interruption in function) by most Information Technology Equipment (ITE). The Curve and this Application Note comprise a single document and are not to be considered separately from each other. They are not intended to serve as a design specification for products or AC distribution systems. The Curve and this Application Note describe both steady-state and transitory conditions.”</i></p>