

To
ERGEG
From
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Memo

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Re
Pilot FG on Electricity Grid Connection

Liander's reaction to the ERGEG public consultation E09-ENM-18-04a:

“Pilot framework guidelines on Electricity Grid Connection”

Introduction

Liander is one of the largest DSOs in the Netherlands. We build, maintain, replace and manage the electricity and gas grids in large parts of the country. Our grid supplies the energy to 2.8 million electricity and 2.1 million gas customers. In addition, we facilitate the market by handling over 448,000 switches annually.

Liander has read the ERGEG public consultation paper with great interest. We welcome the work done by ERGEG, and would like to take the opportunity to contribute to the process with this set of comments on the public consultation.

Answers to Questions for Consultation

General Issues

1. Are there additional major problem areas or further policy issues that should be addressed within the Grid Connection Framework Guideline?
 - a. Answers
 - i. It should be emphasized that these FW Guidelines for Grid Connection are addressing **all** the network/system operators and their customers and not only the TSOs. In the Netherlands the codes basically refer to the network operator (in the Dutch Electricity Law 1998: netbeheerder) and his customers, with special tasks/responsibilities for the only (National) TSO (TenneT, in the Dutch Electricity Law 1998: de landelijke netbeheerder).

- ii. Also the (dependant) relationship between the TSO and the DSO's should be pointed out in a more explicit way (e.g. gathering information).
 - iii. The network codes should not impose too restrictive requirements to make it impossible to deal with the special (capacitive) character of the Dutch grid with a high degree of cables instead of overhead lines.
 - iv. These FW Guidelines for Grid Connection should be adjusted (or at least be synchronized) to the work that already has been done by ENTSO-E on the pilot Network Codes.
 - v. These FW Guidelines for Grid Connection should also deal with the problems that may occur due to the obligation to connect in relation to the existing grid capacity (Congestion Management).
 - vi. These FW Guidelines for Grid Connection should also address the special demands due to Closed Distribution Systems (Third EU-Energy package).
 - vii. These FW Guidelines for Grid Connection should take into account new developments such as Smart Grids, especially at DSO level with a lot of distributed generation.
2. What timescale is needed to implement the provisions after the network code is adopted? Is 12 months appropriate or should it be shorter or longer?
- a. Answers
 - i. This will depend to what extent the network code will be contradictory to the existing network codes under the present Dutch law. Beforehand we do not think this will be the case so the 12 months will probably be enough.
3. Should harmonization of identified issues be across the EU or, perhaps as an interim, by synchronous area?
- a. Answers
 - i. This should at least be by synchronous area. Nevertheless due to the market related part of the network codes this also has to be so within each market (e.g. the North West European market) with more than one synchronous area.

Grid Users related Aspects

4. Should the requirements apply to existing grid users? How should it be decided? To which existing users should the requirements apply? How should timelines for transitional periods be set? Who should bear any costs of compliance?
- a. Answers
 - i. If the new requirements are extending the contemporary requirements within each EU-member the existing grid users in general do not have to comply with the new requirements. Only if they will change their consumption units or generating units they fully have to comply with the new requirements.
 - ii. In exceptional cases (e.g. data needed for market participation or system operation) however it will be necessary to apply the new requirements to existing grid users. If so, there should be a transitional period. The length of such a period depends mainly on the time needed to develop and implement new

- IT-systems or to purchase and install new measuring devices. So in general a minimum transition period of one year will be required.
- iii. The grid users and the system/network operators each have to comply with the network codes. So to be compliant they have to put up with these costs, recoverable within their methodology of regulation.
5. The framework guideline identifies intermittent generation, distributed generation and responsive demand as requiring specific grid connection guidelines. Is it appropriate to target these different grid users? How should the requirements for intermittent generation, distributed generation and responsive demand differ from the minimum requirements? Is there a need for more detailed definition / differentiation of grid users?
- a. Answers
- i. Yes it is appropriate to target these different grid users.
 - ii. For instance the differentiation (after their installed power, their kind of generation or the voltage level of the connection point) could be made in their contribution to the power/frequency control, voltage control or balancing regime.
 - iii. As stated above in the examples of differentiation there is a need for more detailed definition / differentiation. It could be realized by allowing ENTSO-E via these requirements to do so in the network codes.

Implementation

6. Is it necessary to be more specific regarding verification, compliance and reinforcement?
- a. Answer
- i. We do not think so. There are enough margins to allow full play to ENTSO-E to optimize these items in the Network Codes.
7. What are the key benefits and types of costs (possibly with quantification from your view) of compliance with these requirements?
- a. Answers
- i. The FW Guidelines for Grid Connection (via the Network Codes) will create a EU- level playing field to all TSOs/DSOs and their customers, especially the generators.
 - ii. We do not think that the FW Guidelines for Grid Connection will generate extra costs to the Dutch electricity market or more specifically the TSO/DSO.
8. How should significant generation and consumption units be defined?
- a. Answers
- i. That depends on what you mean with "significant". If this is the extent in which these generation and consumption can contribute to help solving critical grid situations it could be:
 1. the extent in which these generating units are controllable or
 2. the voltage level of the grid they are connected to or

3. the installed power.
9. For what real-time information is it essential to improve provisioning between grid users and system operators? Do you envisage any problems such greater transparency? What are the costs (or types of costs) and benefits you would see associated with this?
- a. Answers
 - i. Recently the Network Codes in the Netherlands have been changed to create even more transparency to grid users regarding the transport capacity of the grid and the actual capacity load. So to make it possible to better use the existing transport capacity.
 - ii. The costs due to adjust IT-systems and procedures must be recoverable within the methodology of regulation.