GEODE COMMENTS ON ERGEG PUBLIC CONSULTATION ON PILOT FRAMEWORK GUIDELINES ON ELECTRICITY GRID CONNECTION

GEODE, the European association representing the interest of energy distribution companies welcomes **ERGEG Pilot Framework Guidelines on Electricity Grid Connection.**

II.- General Comments.-

GEODE agrees with **ERGEG** on the importance of having a Network Code that identifies standard minimum requirements on grid connection to be complied by grid users.

As a general comment, **GEODE** would like to point out that more clarification in the text is needed to distinguish when it refers to transmission or to distribution grid, as sometimes concepts seemed to be mixed in the paper.

II.- Comments on ERGEG concrete questions 1 to 9.-

General Issues

1. **Are there additional major problem areas or further policy issues that should be addressed within the Grid Connection Framework Guideline?**

   GEODE considers that main issues as regards gird connection have been considered within ERGEG proposal for Framework Guidelines on Grid Connection.

   GEODE would like to stress the importance of impact assessments and cost-benefit calculations, when a network code, modifies existing standards or introduces new ones. Standards should only be changed or newly introduced if a clear socioeconomic benefit can be demonstrated. In that aspect, **GEODE** supports ERGEG principle that not the guidelines neither the network code shall lift the obligations already set by relevant international technical standards and regulations.

   Any impact assessment and the cost benefit calculation should be transparent and subject to consultation.

   GEODE considers the Framework Guidelines should address the issue of grid connection and network reinforcement cost allocation.

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2. **What timescale is needed to implement provisions after the network code is adopted? Is 12 month appropriate or should it be shorter or longer?**

   According to **GEODE** an appropriate implementation period could be better defined once the content and specifications of the network code are more clearly envisaged.

3. **Should harmonization of identified issues be across the EU or, perhaps as an interim, by synchronous area?**

   Harmonization across the EU should be the main goal of the framework guidelines and related network code.

Grid User 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 the timelines for transitional periods be set? Who should bear any cost of compliance?**

   According the scope of these guidelines they should apply to all kinds of grid users, including existing users. A transitional period for them is foreseen by ERGEG. However further description of the timeframe (a long period should be foreseen) and conditions of the transitional period should be provided by the guidelines.

   The cost of compliance with network code requirements should be assumed by grid users as they are the beneficial parties.

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 the intermittent generation, distributed generation and responsive demand differ from the minimum requirements? Is there a need for a more detailed definition /differentiation of grid users?**

   GEODE considers that the specific framework guidelines for large-scale intermittent generation, distributed generation and demand response are adequate.

6. **Is it necessary to be more specific regarding verification, compliance and reinforcement?**

   GEODE considers that no further specification is needed.

7. **What are the key benefits and types of cost (possibly with quantification from your view) of compliance with these requirements?**

   The benefit is that there will be same minimum requirements applying to different types of grid users connecting to the grid. Cost will be higher therefore the need for impact assessment and cost-benefit analysis.

8. **How should significant generation and consumption units be defined?**

   No comment

9. **For what real–time information is it essential to improve provisioning between grid users and system operators? Do you envisage any problems such as greater transparency? What are the costs (or types of costs) and benefits you would associate with this?**

   No comment

Finally**, GEODE** expresses its wiliness to participate in the process to develop a Network Code on electricity grid connection.

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