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Deres ref./your ref.:
E06-EQS-09-03

Vår ref./our ref.:
DM-74125-v1

Dato/date.:
Oslo, 21th february 2007

Comments to the ERGEG Consultation Paper "Towards Voltage Quality Regulation In Europe"

The Norwegian Electricity Industry Association (EBL) is, regarding voltage quality, in favour of changes that will improve the overall benefit to the society in a cost-efficient way. EBL is familiar with Eurelectric's response to ERGEG's consultant paper "Towards Voltage Quality Regulation In Europe". Basically EBL supports the response of Eurelectric.

In addition to Eurelectric's comments we would like to give our views reflecting our experience with the Norwegian regulation of Voltage Quality. In Norway there has been a regulation related to the quality of supply, including voltage quality, since 2005 (issued by the Norwegian regulator NVE). EBL does not support all the details in this regulation. Especially there should have been given more time to measuring voltage quality parameters, before there were set tighter binding limits than the limits in EN 50 160. In Norway we measure voltage quality parameters in the MV network, in a few nodes, and upon request from customers voltage quality is also measured in the LV network. There have been some problems due to lack of consistency in the definitions, and this has caused delays in measuring voltage quality for some companies. Hence, we do not know precisely what the current voltage quality is. This makes it difficult to say whether the customers benefit from the tight limits that have been set or not, considering the costs and benefits.

When it comes to rapid voltage changes we do agree that NVE has found a more precise definition. This makes it easier to measure rapid voltage changes the same way by different measuring instruments (different suppliers). But we do not agree that NVE in their report TR A6351 necessarily has found the right limit for when rapid voltage changes become a visual annoyance. What is found, is the value where most people can tell that there has been a change in the light (brightness). This is not the same as being annoyed, and none of the persons in the test gave any statement that this was annoying to them.

When it comes to the requirements to rapid voltage changes that were set after the research project, the view of EBL is that these are too tight, and that the project failed to verify the needs of such tight requirements. Some of the time the persons in the project were exposed to rapid voltage changes that in reality were flicker (!). After the test, the test persons were

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asked about the level of annoyance they had experienced. The flicker situation certainly made an effect on their answers. In EBLs view this misled NVE to define tighter limits than necessary.

We also think that too few people were involved in the project. Thus EBL has proposed to NVE that there should be done some more research in this area.

It is also important to verify the rights and obligations for the different actors; the networks, the customers and the equipment industry.

Yours sincerely
Norwegian Electricity Industry Association



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