

ENTSO-E frequency parameter survey

A EURELECTRIC response paper

June 2017

EURELECTRIC is the voice of the electricity industry in Europe.

We speak for more than 3,500 companies in power generation, distribution, and supply.

We Stand For:

Carbon-neutral electricity by 2050

We have committed to making Europe's electricity cleaner. To deliver, we need to make use of **all low-carbon technologies**: more renewables, but also clean coal and gas, and nuclear. Efficient electric technologies in **transport and buildings**, combined with the development of smart grids and a major push in **energy efficiency** play a key role in reducing fossil fuel consumption and making our electricity more sustainable.

Competitive electricity for our customers

We support well-functioning, distortion-free **energy and carbon markets** as the best way to produce electricity and reduce emissions cost-efficiently. Integrated EU-wide electricity and gas markets are also crucial to offer our customers the **full benefits of liberalisation**: they ensure the best use of generation resources, improve **security of supply**, allow full EU-wide competition, and increase **customer choice**.

Continent-wide electricity through a coherent European approach

Europe's energy and climate challenges can only be solved by **European – or even global – policies**, not incoherent national measures. Such policies should complement, not contradict each other: coherent and integrated approaches reduce costs. This will encourage **effective investment** to ensure a sustainable and reliable electricity supply for Europe's businesses and consumers.

EURELECTRIC. Electricity for Europe.

On 23 May 2017 ENTSO-E launched a survey concerning the capabilities (present & future) of generating units or DSR-SFC service. The survey confirms the importance of considering the real capabilities/limitations of the diverse technologies. We have some comments on the context (timing, aim and scope) of such survey as below:

The survey, if necessary, comes too late.

We agree that ENTSO-E needs to supplement its knowledge on the present and future capabilities of all generating units connected to the transmission grid of each TSO. However, considering any changes required in the near future (5-10 years), the capabilities would have ideally been taken into account by ENTSO-E when drafting the Requirements for Generators (RfG) network code: both present and future capabilities are necessary for deciding realistic values for the requirements.

During the drafting of the RfG, generator experts have tried to express some warnings which were not always taken into account. Asking these questions now, after the adoption of RfG, is therefore surprising.

The governance of the survey is insufficient.

Grid Connection European Stakeholder Committee (GC ESC) members should have been consulted before launching this survey.

The main objective of the ESCs is to involve all stakeholders in the issues related to the implementation of the RfG code, for instance for the definition of the studies needed, and about the assumptions and the methodologies to apply. During the 4th GC ESC meeting (9 December 2016), when ENTSO-E presented its current work on Frequency Stability Parameters, several stakeholders, in particular EUTurbines and EURELECTRIC, already asked to be more involved in this topic. Quite a long debate occurred about this issue, and ENTSO-E was asked by chair U. Gabrijel to clarify 'how the work of these expert groups will be made transparent'.

We also note that EURELECTRIC clearly requested a formal expert group twice: first in the 4th GC ESC meeting during which U. Gabrijel asked 'all associations to transfer ENTSO-E's request to get the right experts to be nominated for **this Expert Group**' and again during the related Frequency Parameter Workshop on 9 March 2017. EURELECTRIC provided presentations for both meetings. Despite these requests, we note that the next meeting organised by ENTSO-E is again a Public Workshop and that associations are not consulted more than previously.

The implications, use and legal basis of such a survey should be clarified. We consider many of the questions highly sensitive (e.g. costs) and potential risks can be foreseen.

There is a methodological bias.

EURELECTRIC thinks that ENTSO-E should start from defining the level of needs (type of function/quantity) according to some core assumptions, in particular the effective capabilities of RES (for instance concerning synthetic inertia), capabilities of existing conventional generation, different levels of renewable share per area etc. For future capabilities, the minimum required in the RfG should be a good basis.

On this basis, ENTSO-E should be able to determine suitable values for all parameters (some of them should be equal in all countries, others should slightly differ depending on the actual electrical mix of each country). ENTSO-E and members of GC ESC could then study, within the expert group, the feasibility and the cost effectiveness of the values recommended: a survey on behalf of GC ESC, more focused on some specific capabilities, could be launched for this last stage.

The survey is focused only on the best capabilities of the different technologies.

The survey is introduced as an input for the work that aims to determine the values recommended for frequency parameters. Thus we can expect that the values will be driven by the best capabilities rather than actual needs. *Such an approach cannot lead to an economic optimum* for the electric system which is an objective of the Network Codes. It would target only power system reliability irrespective of the cost, which is not an acceptable approach.

In summary we would like ENTSO-E to recognize the above legitimate concerns and make arrangements for an expert group, as described above, to work on the issues.

EURELECTRIC pursues in all its activities the application of the following sustainable development values:

Economic Development

▶ Growth, added-value, efficiency

Environmental Leadership

▶ Commitment, innovation, pro-activeness

Social Responsibility

▶ Transparency, ethics, accountability



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