ORGALIME

Position Paper

Brussels, 22 January 2016

Orgalime Response to the ENTSO-E Survey on Priority issues for the implementation guidance for the Connection Network Codes

CNC guidance priority topics

The current survey includes a list of issues already identified by ENTSO-E which we kindly ask you to rank based on your own experience. If some other topics are very relevant in the context of the connection codes implementation you are kindly invited to include them in the last part of the survey.

The final aim of this exercise is to identify and rank the most relevant topics which are to be addressed first by ENTSO-E.

Please priorities the following topics according to your own priority:

(Required)	very important	important	less important	of no relevance
Guidance on making non-mandatory requirements at European level mandatory at national level	very important ☑	important ☐	less important ☐	of no relevance ☐
General guidance on CBAs	very important ☐	important ☑	less important ☐	of no relevance ☐
General guidance on parameters for non-exhaustive requirements	very important ☑	important ☐	less important ☐	of no relevance ☐
Guidance on compliance, test and monitoring	very important ☑	important ☐	less important ☐	of no relevance ☐
Reactive power on TSO-DSO interface	very important ☐	important ☑	less important ☐	of no relevance ☐

Orgalime, the European Engineering Industries Association, speaks for 42 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.3 million people in the EU and in 2014 accounted for more than €1,800 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.

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(Required)	very important	important	less important	of no relevance
Rate-of-change-of-frequency withstand capability	very important ☑	important ☐	less important ☐	of no relevance ☐
Reactive power requirement for PPMs & HVDC converters at low / zero active power	very important ☑	important ☐	less important ☐	of no relevance ☐
Post fault active power recovery	very important ☐	important ☑	less important ☐	of no relevance ☐
Fault current contribution from PPMs & HVDC converters	very important ☑	important ☐	less important ☐	of no relevance ☐
Interactions between HVDC controllers	very important ☑	important ☐	less important ☐	of no relevance ☐
Need for Synthetic Inertia for frequency regulation	very important ☐	important ☑	less important ☐	of no relevance ☐
Frequency related parameters for non-exhaustive requirements	very important ☑	important ☐	less important ☐	of no relevance ☐
System restoration requirements	very important ☑	important ☐	less important ☐	of no relevance ☐
Instruments, simulation, models & protection for non-exhaustive requirements	very important ☑	important ☐	less important ☐	of no relevance ☐
Voltage related parameters for non-exhaustive requirements	very important ☑	important ☐	less important ☐	of no relevance ☐
Determination of the thresholds for Types B, C & D power generating modules	very important ☑	important ☐	less important ☐	of no relevance ☐

Other topics that are highly relevant to you and are suggested to be addressed in the ENTSO-E guidance documents?

Additional priorities

The European Engineering Industries represented by Orgalime support the development of Connection Network Codes and thanks ENTSO-E for the opportunity to participate in this survey. We would like to name the following topics that are highly relevant to our industry and we suggest they should be addressed in the ENTSO-E guidance documents:

- Orgalime suggests to develop very clear guidance documents for each one of the three Connection Network Codes, the Requirements for the Generation, Demand Connection and on High-Voltage Direct Current.
- In particular, it must be clear which of the non-mandatory requirements at European level and mandatory requirements at national level are relevant to manufacturers and from which date they are becoming effective.
- It must also be clearly written, if the exhaustive and non-exhaustive requirements are obligatory for existing, renewed or new equipment.
- Manufacturers must know as soon as possible what the non-exhaustive requirements are. They need to test their products and make them compliant. Therefore, Orgalime suggests that the guidance document states that the national process to specify each of the non-exhaustive requirements must be swift, transparent and start without any delay.
- We suggest further to give strong guidance to involve manufacture national representatives (national) associations in the national specification processes for the non-exhaustive requirements from the beginning.
- Member States, TSO and NRA must provide sufficient guidance and information to manufacturers about the specification process: who is in charge of the process? Which requirement is being specified? When does the process start and when does it end? What are the final deliverables? Etc.
- Orgalime advises strongly to guide TSOs for a harmonised approach when specifying the non-exhaustive requirements at national level, in particular for Frequency related parameters for non-exhaustive requirements and Voltage related parameters for non-exhaustive requirements.
- Orgalime advocates that national-specific requirements should be created in alignment with existing International and European Standards or in coordination with on-going International or European Standardisation work (for example, TC8x). Deciding for national specific requirements that go beyond existing standards or ignore ongoing standardisation work, will cause safety issues and hamper interoperability and may therefore lead to limited competition and delay of the deployment of smart grids technologies across Europe. It will also increase costs of the equipment or delay the time to market.
- With regards to the Demand Connection Code (DCC), we ask ENTSO-E to provide guidance leading to a fair market uptake of demand response and fair participation of demand side resources. Grid stability and demand response participation should be considered as two major achievements of the DCC and therefore should not be treated as mutually exclusive.

Orgalime remains available to discuss our points in more detail with ENTSO-E.