# Common response of electricity generation federations to the C10/11 public consultation (September 2018)

## Summary of major comments

## 1. Introduction

On the 20th of July, 2018 Synergrid launched a market consultation on an in-depth revision of the technical prescription C10/11 - Specific technical prescriptions regarding power-generating facilities operating in parallel to the distribution network.

We welcome this consultation and thank Synergrid for creating this opportunity for all stakeholders to express their views on the proposals of Synergrid. We would like to put forward some comments and suggestions on the modification of the regulatory document. This note is an integral and indivisible part of the formal consultation document.

On Tuesday 11 September 2018, Synergrid organized a workshop with regard to the revision of C10/11. We would like to underline the importance of the workshop organized by Synergrid and hope that this initiative will play an exemplary role for future consultations.

This documents summarized our major comments and issues. It is accompanied by an Excel file containing all the detailed remarks.

## 2. Comments and suggestions

The following comments and suggestions are built around a set of general principles that are the standards against which the C10/11 documents are measured.

- **Cost efficient network safety, that promotes the energy transition**

We regret that some of the obligations imposed by C10/11 may have the potential to slow down or complicate the energy transition, e.g. limitations on the use of batteries, limitations of the large-scale roll-out of certain energy transition-promoting technologies, administrative obligations, *etc*.

We as federations want to emphasize that the safety of the grid and the energy transition are equally important, and therefore requirements have to be assessed by their cost vs benefit, and thus their impact on this energy transition.

For example:

- External decoupling devices should not cause projects to become non viable economically, especially when redundant internal decoupling protection exist. We welcome the change from 10kVA to 30kVA but we believe that the economical optimum lies at 70kVA, therefore we propose to adopt this limit. So far, we still have not received any technical justification for which this would not be acceptable
- Decoupling sensors should be installed at the most convenient location for the DSU (distribution system user), especially when other locations, even if slightly better, incur disproportionate costs (e.g. major substation works)
- Remote control and monitoring, which is at the heart of a “smart grid”, should be made more affordable. They should also be imposed in a smart way, without incurring unnecessary costs.
    - We think all DSO (distribution system operators) should impose these devices only where required (even if this implies a change of legislation)
    - The cost could be socialized, since the imposition does not depend on the DSU himself but on the configuration of the grid around him
    - Storage should be used to reduce investements in assets, and production units with storage should be considered to have a lower impact on the grid (lower need for RTU)

We should work together, market players and grid operators, on efficient market designs that valorize flexibility in the most efficient way, through a flexibility market. This flexibility must reduce investements in assets, not increase them!

- **Future-proof design**

Some rules have the tendency to slow down certain technical evolutions that are linked to the energy transition. For example, we strongly believe that batteries can play an important role in supporting future-oriented distribution network management. We should avoid regulation that might block technological innovation.

In the case of Vehicle-to-Grid applications (V2G), they are not even yet in their infancy and the future technical specifications are not yet known. For this reason, we propose an exemption of technical requirements for the time being, until the first pilot projects (which will have a minimal impact on the grid) have been developped.

However, since we are convinced that this technology will need to be regulated at some point in the near future, we would favor to quickly set up a joint working group between market stakeholders and grid operator. This would allow us to monitor the evolution of this topic from both points of view and to be ready to implement future regulations, before problems arise.

Also, in the case of other residential applications, we expect a very quick evolution of the market in the coming years (electrification of transport and heating, distributed production, smart meters, valorization of flexibility, etc). The constrains for application of LV1 procedure should be less restrictive and less complicated, because they risk blocking the development of mass market innovation. Agile evolution of regulation can here also be insured by better continuous communication between stakeholders.

Finally, residential DSU's who accept a strict bidirectionnal limitation of their grid connection (e.g. 10kVA), whether physical or software-limited, should be given much more freedom to implement innovative solutions, of any size, behind the meter.

- **Level playing field**

We would like to emphasize that a guiding principle throughout the C10/11 documents, when imposing an obligation, should be in respect to a level playing field with our neighboring countries and between the different regions within Belgium. This is of paramount importance for companies who are active in a competitive and European markets.

If the C10/11 documents state that "Every DSO can impose additional requirements in addition to the Synergrid prescription C10/11.", the setup of the document is not consistent with maintaining a level playing field within Belgium and compared to our neighboring countries.
We ask that any additional requirements imposed by a DSO be motivated and justified by a technical specificity of the network of this DSO.

An example is the step response time to decrease active power during over frequency. While several grid codes in neighboring countries define a ramp-rate around 0.5% Pn/s, Belgium uses the value of 5% Pn/s. Multiple genset manufacturers already confirmed that they cannot comply with this requirement.

- **Fair allocation of costs and risks between DSO and DSU**

A fair allocation of costs and risks between the DSO and the DSU must be guarded in the C10/11 documents. For example, the risk of untimely switching off the Interface protection system, is a risk for the DSU and can best be assessed by the DSU. The DSO's should not interfere in the responsibility of the DSU.

Also the requirement of an additional homologated synchroscope in case the synchronous generator has already an internal synchroscope. No production facility owner will ever accept the risks of an installation with a malfunctioning internal synchroscope. Nevertheless, C10/11 demands an additional one, with synchronization problems as result.

We regret that during the installation of a production facility in the main cabin, it sometimes requires the renovation of the cabin, while the cabin can remain unchanged if the production facility is abandoned. As a result, customers consider cabin costs as an additional cost for the production facility We also regret that the DSO sometimes charges the costs of a new connection cable to the DPU (Decentralized Production Unit). As previously explained the system should support the energy transition and not limit it.

- **Fair remuneration**

The C10/11 documents impose a wide variety of obligations (e.g. supply of reactive power, telecontroled curtailment of PV-installations, *etc*.) but there is no financial compensation. Although Synergrid indicated during the workshop of 11 September that a financial compensation is outside of the scope of the C10/11 document, a lot of the technical obligations have financial implications. It is artificial not to treat both elements simultaneously.

Therefore we would like to suggest that Synergrid adds a generic text stating that they agree with the principle that equitable payment must be made for a service provided by power-generating facilities. Moreover, market players will only be able to fully support the technical requirements once the remuneration will be known.

- **Transparency**

Synergrid should be transparent on why certain rules are imposed. For example, the use of a contactor for the interface protection system is allowed by the DSO's until 375A (instead of 80A). Why is the 80A limitation used here?

- **Inherent limitations**

Some requirements are not physically possible. The reference condition for the maximum power reduction in case of under frequency is a requirement that is not achievable for gasturbines, as acknowledged by ENTSO-E.

- **User friendly document**

As these documents will be used by people in the field, with limited knowledge of higher regulations, we would like to recommend to edit a document that stands on its own. We think it would be highly user friendly to implement certain definitions in the text.

## 3. About our federations

Our federations represent the Belgian companies active in electricity generation :

- Cogen: federation for cogeneration
- Edora: federation of renewable energy companies (FR)
- Ode: federation of renewable energy companies (NL)
- Volta: national umbrella organization of the sector organisations active in electrical installation
- Techlink: Federation of technical engineers and (gas) installers
- FEBEG: Federation of Belgian Electricity and Gas Companies