

Response ID ANON-5Y5K-RGCF-G

Submitted to **ENTSO-E survey on priority issues for Connection Network Codes implementation guidance**
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Introduction

1 What is your name?

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3 What is your organisation?

Organisation:

EUTurbines - European Association of Gas and Steam Turbine Manufacturers

CNC guidance priority topics

4 Please prioritise the following topics according to your own priority:

priorities - Guidance on making non-mandatory requirements at European level mandatory at national level:
very important

priorities - General guidance on CBAs:
important

priorities - General guidance on parameters for non-exhaustive requirements:
very important

priorities - Guidance on compliance, test and monitoring:
very important

priorities - Reactive power on TSO-DSO interface:
less important

priorities - Rate-of-change-of-frequency withstand capability:
very important

priorities - Reactive power requirement for PPMs & HVDC converters at low / zero active power:
less important

priorities - Post fault active power recovery:
very important

priorities - Fault current contribution from PPMs & HVDC converters:
less important

priorities - Interactions between HVDC controllers:
very important

priorities - Need for Synthetic Inertia for frequency regulation:
important

priorities - Frequency related parameters for non-exhaustive requirements:
very important

priorities - System restoration requirements:
very important

priorities - Instruments, simulation, models & protection for non-exhaustive requirements:
very important

priorities - Voltage related parameters for non-exhaustive requirements:
very important

priorities - Determination of the thresholds for Types B, C & D power generating modules:

less important

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

additional priorities:

EUTurbines suggests that ENTSO-E guidance documents furthermore highlight the need of thorough technical analysis of the industry-wide capability to meet the requirements, before setting them in individual EU Member States and grids.

Most onerous transposition of requirements contained in ENTSO-E framework in National legislation may lead in over-estimating the actual contribution of the generating units during a grid event, and overall increase systems disturbance risks. Utilities and manufacturers may analyse and state compliance in good faith, while acknowledging the (inherent) increased risks of failure to meet the requirement. This level of risk shall be clearly understood and reported at distribution & transmission system operation level. As an example, power output requirement at falling frequency can be a challenge for rotating machinery. Compensation measures implemented to meet the newly-set power need may end up in harsher unit operation throughout events (higher firing temperature, tighter operating margins), which could lead to reduced changes of success for event happening across unit life. A more sensible approach would be to avoid setting the bar too high on the generation side and design the under-frequency demand disconnection scheme accordingly (demand a bit less to greatly reduce the risk of total plant emergency trip, for a very limited amount of MW requirement).

Additionally, discrepancies between requirements in the network codes and international technical standards for equipment should be addressed transparently and guidance should be provided on how harmonization between network codes and standards can be achieved.