

Response from the European Wind Energy Association on the public consultation on the ACER draft Framework Guideline on System Operation

Questions:

- 1. The Initial Impact Assessment (IIA) identifies the following challenges (i) growing amount of distributed generation and variable generation (ii) increasing interdependence of control areas. Are there additional key cross-border challenges that the Framework Guidelines (FGs) and Network Code(s) on System Operation should address?**

In EWEA's view these two main challenges are sufficient to be the basis of identified cross-border challenges in this IIA of the Framework Guideline (FG) on system operation. However, the IIA's indication that variable generation is hard to predict (see page 8 of the IIA) is overly simplistic and does not take into account today's realities. There has been important improvement in the performance of wind power forecasting tools since the beginning of the century decreasing the average forecast errors significantly. These improvements, which shall continue in the future, are mainly due to better weather forecasts, increasing spatial distribution of installed wind power capacity in many control zones and advanced power forecast models, especially using Numerical Weather Prediction (NWP) and power forecast models.

- 2. The Framework Guidelines identify a number of actions and requirements to be included in the Network Code(s) as a solution to these challenges. Are the actions and requirements identified in the Framework Guidelines appropriate to solve these challenges?**

The draft FG outlines a number of subsequent Network Codes (NC) topics roughly indicating the framework and criteria the respective NCs shall fulfil. In this context it is impossible to scrutinise at this stage if this is sufficient to meet the identified challenges. It rather depends on how the NCs will be structured and which content they provide.

- 3. Are the proposed levels of harmonisation sufficient to solve these challenges?**

See answer to question 2.

- 4. Should the Framework Guidelines be more specific with regard to areas that need to be harmonised, both across and within synchronous areas?**

Yes, ENTSO-E should have clear indications with regards to the level of harmonisation in the specific areas. Subsequent network codes should clarify roles and responsibilities, especially considering differences in the tasks of TSOs and DSOs with regards to system operation which are often caused by national law. In this context it should be taken into account that the structure of the distribution system differs a lot across EU Member States, with the number of DSOs varying from 1 to over 800 DSOs in the respective countries.

5. Should the Framework Guidelines require the development of common rules for System Operation between synchronous areas?

No opinion.

6. Considering the current arrangements of the system operation rules and procedures throughout the EU, what would be an appropriate level of detail for the Network Code(s) on System Operation?

See answer to question 10.

7. What key benefits and types of cost would you expect for compliance with these requirements? Please quantify from your point of view.

No opinion.

8. Should the Framework Guidelines be more precise on organisational aspects of operational security, in particular with regard to security assessment?

No opinion.

9. Are the implications for significant grid users clear and relevant?

There is no sufficient definition given of the term “significant user” besides the statement that it remains to be defined in the network code(s) on basis on their system impact. With this definition any implications for significant grid users remain unclear as a more precise description would be needed.

10. Are the roles and responsibilities sufficiently addressed?

No. In general ACER should make ENTSO-E in these Framework Guidelines strive for the highest possible level of clear and systematic specifications in the network codes. This



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will help ensuring a practical and unambiguous application as well as clarifying roles and responsibilities of respective stakeholders.

11. Are the individual provisions under Scope & Objectives, Criteria, Methodology & Tools, Roles & Responsibilities, Information Exchange and Implementation Issues, associated to the particular topic, adequate? Should there be any additional elements?

There is a wide range of potential overlaps between this FG and the FGs on balancing, grid connection and any subsequent network codes emerging from those. Either under the “roles and responsibilities” section or in an additional separate section on “relation to other framework guidelines and network codes” a clear line should be drawn in order to establish a coherent and compatible framework.

12. Could you foresee any other relevant New Applications which should be mentioned in these Framework Guidelines?

The part on new applications under this draft Framework Guideline remains completely unclear as the items listed are a mix of market, system operation and system development related topics with no further specification. Again, there is a wide range of potential overlaps in upcoming FGs and subsequent NCs that should be clarified before establishing such a separate section on “new applications”.

An important issue for power system operation is how much installed wind power capacity statistically contributes to the guaranteed capacity at peak load, the so-called “capacity credit”. Due to the variability of wind, its capacity credit is lower than that of other technologies. Nevertheless, there is a certain amount of firm wind capacity, which contributes to the adequacy of the power system. Despite the real technical and physical capacity value of wind power, it is not yet regularly used for capacity planning and is not given a value in power markets either. One of the barriers is the absence of a standardised accepted method for calculating capacity credit. This topic could be therefore a potential “new application” under these FG. A subsequent ENTSO-E network code would then develop and implement a harmonised method for wind power (and other variable RES) capacity credit assessment to be used in European generation adequacy forecasts, in order to properly evaluate the contribution of wind power to system adequacy. This would also constitute a basis for valuating wind power capacity in the future liberalised electricity market.

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