

Grid Connection ESC: Template for reporting issues regarding implementation of NC RfG, NC DCC and NC HVDC

Version 2017-03-01

Affected NC	NC RfG
Topic	Applicability of RfG to existing type A/B PGMs
Related article(s)	4.1
Member State (abbr)	ES
Affected parties	PGMs / DSO
Reporting party	DSO
Date of introduction	14/03/2017

Description of the issue

It seems there are three possible interpretations regarding how article 4.1 can affect existing type A/B power-generating modules surpassing the B/C threshold:

- **Option A):** existing type A/B power-generating modules are exempt to be RfG compliant forever. Therefore, an existing Type A/B power-generating module can be modified in order to increase its capacity to type C/D with no need to be RfG-compliant.
- **Option B):** existing type A/B power generating modules are exempt to be RfG compliant if they change their significance level to C/D. However, once their significance level is C/D, we would be dealing with “a type C or type D power-generating module has been modified to such an extent that...”; therefore, if the power-generating module were modified again, it would have to be RfG compliant.
- **Option C):** existing type A/B power-generating modules are exempt to be RfG compliant as long as they don’t change their significance level to type C/D.

The next table summarizes the three alternatives:

Alternatives	Initial situation (Existing type A/B)	Substantial modification (Type C/D)	2nd substantial modification (Type C/D)
Option A	<i>Non RfG-compliant</i>	<i>Non RfG-compliant</i>	<i>Non RfG-compliant</i>
Option B	<i>Non RfG-compliant</i>	<i>Non RfG-compliant</i>	<i>RfG-compliant</i>
Option C	<i>Non RfG-compliant</i>	<i>RfG-compliant</i>	<i>RfG-compliant</i>

We believe that the more sensible interpretation is option C, but we are not sure if option C is “valid” according the RfG.

Adopted solution

Lessons learned