
ENTSO-E response to joint DSOs question re RfG Article 4(1)

External Project Team / WG CNC

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Art. 4.1 f the NC RfG establishes:

Existing power-generating modules are not subject to the requirements of this Regulation, except where:

(a) a type C or type D power-generating module has been modified to such an extent that its connection agreement must be substantially revised in accordance with the following procedure:

[...]

(b) a regulatory authority or, where applicable, a Member State decides to make an existing power-generating module subject to all or some of the requirements of this Regulation, following a proposal from the relevant TSO in accordance with paragraphs 3, 4 and 5.

How to deal with type A or type B PGMs (or aggregation of PPMs) that are modified in order to increase their capacity above the B/C threshold?

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

Answer

ENTSO-E considers **Option C** to be the correct interpretation of Article 4(1)(a). The power generating module (PGM) type, to which Article 4(1)(a) refers to, is understood as the type after the substantial modification. The rationale behind this understanding is, that RfG compliance in case of modifications is triggered by a substantial revision of the connection agreement. A change of the PGM type due to a modernisation should undisputedly constitute a substantial revision. If modification of type B results in an increased maximum capacity above type C thresholds, the modified PGM shall meet type C requirements as far as subject to the modification. The extent of RfG compliance after such a modification would need to be evaluated case-by-case and is to be decided by the NRA or, where applicable, by the Member State according to Article 4(1)(a)(iii).