

Question regarding definition of “new power- generation module”

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Question regarding definition of “new power-generation module”

- RfG Article 7(4) requires relevant TSOs to submit a proposal for requirements two years after the entry into force, May 17th 2018.
 - RfG Article 7(6) requires the competent entities to decide upon the proposal within 6 month resulting in November 17th 2018.
- As a consequence, connection requirements will be, in general, available following Nov. 17th 2018

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- RfG Article 3(1) requires all new power-generation modules to be compliant with RfG
- RfG Article 4(2)(b) defines that a generating module shall be considered “existing” if the “main generating plant” has been purchased (binding contract) two years after entry into force of RfG, resulting in May 17th 2018
- Some mass market technologies have only several weeks between conclusion of a binding contract and commissioning of the plant.
- Typical main components such as inverter or uCHP units are on stock even before a binding contract is concluded.
- As a consequence, first “new” power generating plants will be connected in June 2018, 5 months before the connection requirements must be decided upon.
- These power generating plants need to be updated before May 17th 2019

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Possible solutions:

- RfG Article 4(2)(b) last paragraph states:

A Member State may provide that in specified circumstances the regulatory authority may determine whether the power-generating module is to be considered an existing power-generating module or a new power-generating module.

Some member states use this statement to define existing power generating modules as:

- Generators that have presented a complete request for connection to DSO before May 2019
- Generators whose Power-Generating Module(s) was already connected to the DNO's Distribution Network before May 17th 2019
- Member states not having decided upon requirements until today should consider similar solutions.

Conclusion

Thank you for your attention.

Updated Planning EN 50549-1; -2

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