POSITION

Subject:	Public consultation for the submission of a proposed general derogation from Regulation (EU) 2016/631 establishing a network code on requirements for grid connection of generators ("RfG"): **Joint reaction FEBEG-EDORA and ODE**
Date:	22 May 2019

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FEBEG, EDORA and ODE welcome the public consultation for the submission of a proposed general derogation from Regulation (EU) 2016/631 establishing a network code on requirements for grid connection of generators ("RfG"). The three Federations want to emphasize the importance of the derogations for the market participants in the Belgian market: the derogations will considerably lower the obligations – and corresponding costs – for grid users and contribute to levelling the playing field, in particular for the development of small RE technologies on industrial sites, with neighbouring countries. Therefore, we fully support the derogations and the justifications developed by Elia. We also call upon the competent authorities to approve the proposed derogations.

On top of that, FEBEG, EDORA and ODE would like to add the following comments and suggestions.

We welcome the quality of the justification document (Dutch version). It describes well all aspects of this issue and also the legal obligations imposed by the RfG network code.

Nevertheless, we propose to add following comments:

1. The use of the CENELEC standards 50549-1 and 50549-2. If no derogation would be granted, those standards cannot be applied for installations connected at 110 kV or more creating so additional costs for the owner and for Elia (not allowed to use the standard for compliance testing) without any added value for the electrical system.

2. Future evolutions of the RfG code. The European Commission, ACER and ENTSO-E recognise that the insertion of a voltage limit in the classification of PGMs could become subject of a potential amendment in the near future. A dedicated European Expert Group proposed three preferred solutions for this issue : Removal of voltage criteria (for all of types A-C) OR Removal of voltage criteria for A & B OR The introduction of a new notion "Interface point". More details are available at :

https://docstore.entsoe.eu/Documents/Network%20codes%20documents/Implementation/stakeholder_committees/GSC/2019_03_21/TOP.%204.%20Report%20from%20EG%20MCS.pdf

3. The RfG network code is a piece of legislation to create a level playing field at the level of the European Union. The regulation in Belgium has to be consistent with those in larger countries as Germany and France. It seems to be that France has the intention to ask for a similar derogation. The German standards VDE-AR-N 4120 and VDE-AR-N 4130 allow even a similar derogation for a type C power unit due to the particular approach of the ownership of a network by stipulating that a private network is technically identical to a public network. Small power units are mass products and Belgium cannot effort to impose more stringent requirements than other countries do.

4. FEBEG, ODE and EDORA regret that Elia has decided not to ask also for a class derogation for type C power units. Such derogation would present a major economic value for "combined heat-power" units installed at large industrial sites.

Regarding your demand for the costs of an AVR and a PSS, we regret not to be able to submit the requested data.
