

Febeliec answer to the Elia consultation on the request for class derogation under RfG

Febeliec would like to thank Elia for this consultation on the request for class derogation under RfG with respect to power generating modules connected on a voltage level of higher than 110 kV, as well as for the request for such class derogation, in order to cope with a wide range of issues identified during the discussion on the implementation of the European Connection Codes in Belgium, through a.o. the rewriting of the Federal Grid Code and the C10/11 prescriptions.

Febeliec has following remarks, all of which have already been communicated to Elia throughout the process of the writing of the Federal Grid Code as well as during the discussions on this class derogation during the meetings of the Working Group Belgian Grid:

- Febeliec regrets that Elia only applies for a class derogation for these PGMs connected at a voltage level of at least 110 kV with a capacity of less than 1MW (type A if not connected at a voltage level of at least 110 kV) or between 1 and 25MW (type B if not connected at a voltage level of at least 110 kV), but not for those PGMs of a capacity of between 25 and 75 MW (type C if not connected at a voltage level of at least 110 kV). Febeliec has discussed this at length with Elia and other stakeholders as well as regulators throughout the past and while having certain understanding for the arguments enumerated by Elia throughout these discussions as well as (briefly) in the consultation document at hand, for Febeliec these arguments do not counterbalance the maintaining of a discrimination between PGMs of a capacity between 25 and 75 MW that are either connected at voltage levels below 110 kV or in closed distribution systems at internal voltage levels below 110 kV on the one hand and those connected directly or in an (industrial) site (non-CDS) connected at a voltage level above 110 kV, while for the rest being technically the same PGMs. Febeliec regrets that Elia does not apply for a class derogation for such units, meaning that all concerned parties will individually have to apply for derogations to avoid discrimination, increasing the workload for all involved parties.
- Febeliec regrets that Elia only applies for this class derogation for a period of 5 years. Febeliec especially regrets this for units smaller than 1MW connected to the public grid at voltage levels of more than 110 kV, as even in 5 years their impact, as acknowledged by Elia in its reasoning, will still be very limited, especially also taking into account the very large volume and quantity of such units not connected at voltage levels above 110 kV. This topic was discussed during the Working Group Belgian Grid and Febeliec reiterates its request to extend this period to a much larger time frame, and at least 20 years, to avoid uncertainty and to avoid having to reapply for a class derogation every 5 years (with the risk for grid users that Elia would not apply for such a class derogation, leading to a bulk of individual derogations). For PGMs of a capacity between 1 and 25 MW, Febeliec could understand under certain circumstances that if a large volume and quantity of such units would in the future be connected at voltage levels above 110 kV, this might have a more significant impact on the transmission grid than for units smaller than 1MW. However, here again this does not solve the above-mentioned discrimination and would also require manufacturers to develop different configurations of PGMs based on the connection voltage level, leading to inefficiencies and thus societal value loss. Hence, Febeliec would urge Elia to also apply for these units for a longer derogation period than 5 years, in order also to avoid unnecessary re-application work for derogations.
- Last Febeliec would like to comment on the fact that Elia states that it has no knowledge of any PGMs of a capacity of less than 1MW connected at voltage levels of at least 110 kV. While this is correct, because Elia does not keep track of such units under the threshold of 1MW, this does not imply that there are no such units. More precisely, there are probably a myriad of such PGMs and thus the granting of a class derogation for such units is very important. The fact that Elia does not even keep track of such units is moreover a clear indication of their limited impact and as such an additional element for regulators to grant the requested derogation, as it is clear that their impact on the grid is considered negligible, especially as they are most likely embedded in (much) larger (consumption) sites, dwarfing their individual and direct impact on the grid.