

Belgian Generators Associations point of view on categorisation of Significant Grid Users

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Elia expert group implementation NC's

General comments

- **Harmonisation** within (regions of) Europe should be the goal as much as possible
- Don't create **competitiveness** distortion for Belgian generator facilities when categorizing
- **Cost-effectiveness** of choices is crucial. If Belgium needs to deviate from the upper limits, give **cost-benefit analysis**.
- **Grid services** should be procured via **market mechanisms**. Don't exaggerate the 'insurance' for grid operators via the NC's. Requirement for delivering grid services should be in the service contract.

General comments

- With no view on implementation of requirements, worst case is to be taken into account.

→ For BGA, the discussion on categorisation of grid users is to be continued later

Upper limit category A: 1MW

- Limits should be expressed in kW/MW, not in kVA/MVA. Otherwise:
 - incoherence with other MS
 - more installations in type B
- 250 kVA is too arbitrary – why follow Walloon grid code and e.g. not Flemish code or C10/11?
- Significant impact for (small) installations of the requirements of type B
 - Significant cost increases (vs type A: +15-20%)
 - Additional costs from requirements of other NC's
- Impact on power equipment supply market if diverging limit between MS

Upper limit category B: 50 MW

- Industrial cogeneration units: keep in type B
 - No use to put in type C for delivery of frequency control because exemption in RfG
 - Embedded in industrial sites, so not directly interacting with the grid and no desired behavior
 - If in type C : existing cogen's to comply with RfG when substantial modification
- Relevance to base limit on individual production permit?
- Wind farms: keep in B (requirements in C unclear)

Criteria for category C

- Delivering FCR, FRR & RR should not be a criterion. Requirements for delivering these services should be in the contract

Criteria for category D

- Additional limit of 25 MW if PoC is >110 kV creates unequal treatment of installations that are or are not embedded in industrial sites
- Delivery of black start service should not be a criterion. Requirement for delivering this service should be in the contract

Types	ENTSO-e Latitude	Draft proposal Elia	Proposal BGA
Type A	Maximum capacity $\geq 800\text{W}$ & PoC $< 110\text{ kV}$	$800\text{W} \leq P_{\text{inst}} < 250\text{kVA}$	$800\text{W} \leq P_{\text{inst}} < 1\text{MW}$
Type B	Maximum capacity $\geq \text{XX}$ but max 1MW & PoC $< 110\text{ kV}$	$250\text{kVA} \leq P_{\text{inst}} < 25\text{MW}$ Equipment certificate for DSO grids & LVRT	$1\text{MW} \leq P_{\text{inst}} < 50\text{MW}$
Type C	Maximum capacity $\geq \text{XX}$ but max 50MW & PoC $< 110\text{ kV}$	$25\text{MW} \leq P_{\text{inst}} < 75\text{MW}$ Or FCR, FRR, RR services	$50\text{MW} \leq P_{\text{inst}} < 75\text{MW}$
Type D	Maximum capacity $\geq \text{XX}$ but max 75MW or PoC $\geq 110\text{ kV}$	$P_{\text{inst}} \geq 75\text{MW}$ Or Blackstart Or $P_{\text{inst}} \geq 25\text{MW}$ & PoC $> 110\text{ kV}$	$P_{\text{inst}} \geq 75\text{MW}$