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ACER workshop on the NC HVDC: Views from the wind industry

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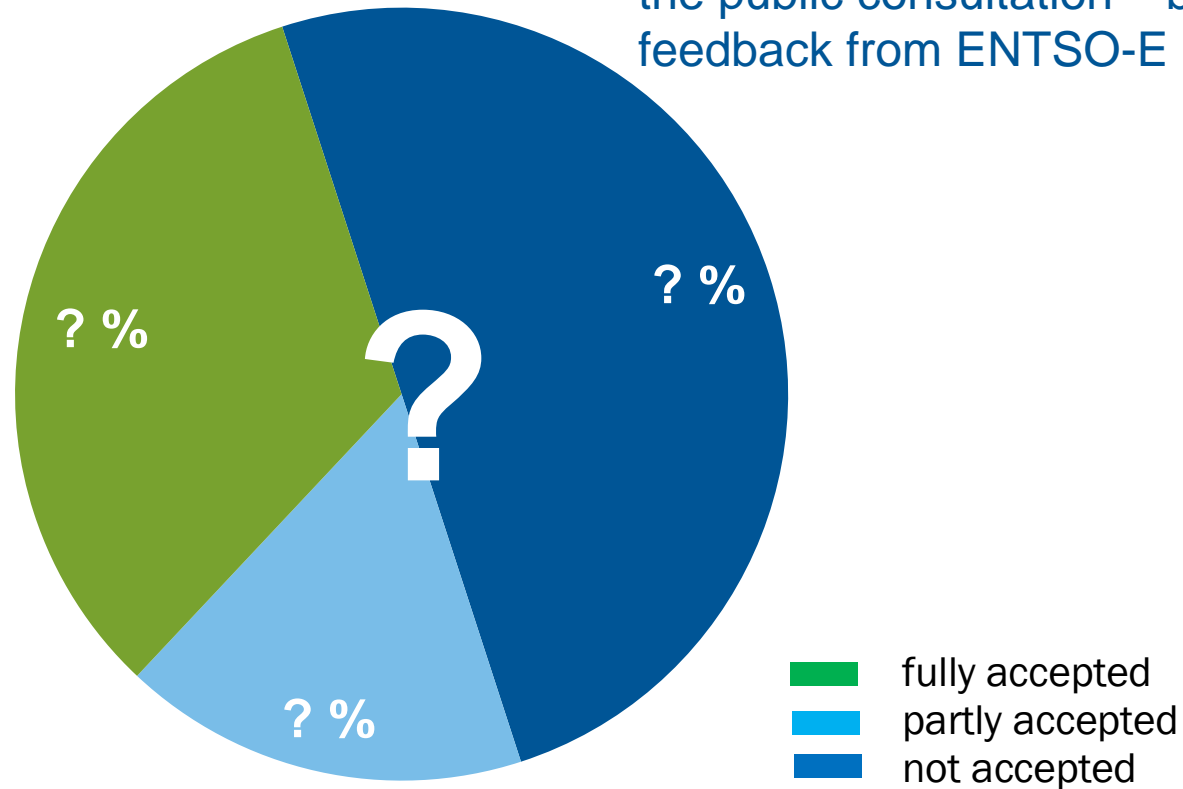


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How were EWEA comments on the NC HVDC dealt with?

EWEA submitted 54 comments to the public consultation – but no feedback from ENTSO-E



Final NC HVDC main concerns

- ➔ Many remaining technical issues. There has been insufficient time for balanced response & discussions:
 - Throughout the whole process
 - Between end of public consultation and final NC version

- ➔ A new definitions chapter has been proposed for all connection codes without any announcement or public consultation among the stakeholders.

- ➔ Insufficient transparency throughout the entire NC development process – how the NC gets drafted remains a black box.

Final NC RfG main concerns



Non-exhaustive requirements open the door for arbitrary decisions by national TSOs via Art. 4.3 in the NC

- ➔ Leaving a number of disputed points open for national grid operators to decide, together with the change in Article 4(3) holds the risk that national TSO's impose costly or technically inappropriate requirements on generators while avoiding cost benefit analysis.
- ➔ Implementation guidelines are one approach to alleviate this, but these are non-binding documents

Final NC HVDC main concerns

ACER FG still not fulfilled as no cost-benefit analysis for new/extended requirements

➔ Especially the non-exhaustive requirements are not properly justified, in particular reactive power:

➔ This means, with reference to Art. 4.3. a Relevant Network Operator can request a fully rectangular P-Q/Pmax-profile from a PPM!

Why are these wide reactive power capability ranges needed?

None of the accompanying ENTSO-E documents answer this sufficiently!



Mental exercise:

What can national implementation of excessive non-exhaustive requirements lead to...?



Conclusion

Looking at process and current NC contents, many concerns remain:

- Too much room for ‘arbitrary’ local TSOs decisions via Art. 4 (3)
- Requirements are still not justified – not technically / nor economically
- Added value on chapter 3 remains doubtful