

**Distribution Code Review Panel
Meeting 75 – Thursday 11 April 2019**

Modifications to EREC G99 to reflect the scope in EU 2016/631 in respect of existing power generating modules

Paper by Tim Ellingham (on behalf of RWE)

1. Introduction

This Paper has been prepared by Tim Ellingham representing RWE Supply and Trading and RWE Generation UK. G99 represents the replacement of G59 in order, in part, to implement the EU regulation 2016/631 also known as Requirements for Generators (RfG) which aims to achieve the following:

Harmonised rules for grid connection for power-generating modules should be set out in order to provide a clear legal framework for grid connections, facilitate Union-wide trade in electricity, ensure system security, facilitate the integration of renewable electricity sources, increase competition and allow more efficient use of the network and resources, for the benefit of consumers.

A concern for the industry is the treatment of existing sites that undergo modification as enforcement of G99 on to PGMs that previously fulfilled G59 may make such modification uneconomic and therefore the proposed site unviable. RfG sets out the treatment of existing PGMs in relation to Type and it is this element that has been lost in implementation into G99.

2. Background

Article 4 of 2016/631 defines the treatment of application to existing Power-Generating Modules and is brief, but clear, as follows:

1. Existing power-generating modules are not subject to the requirements of this Regulation, except where:

(a) a type C or type D power-generating module has been modified to such an extent that its connection agreement must be substantially revised in accordance with the following procedure:

The scope of EREC G99 states:

The requirements set out in this EREC G99 shall apply to Generators owning any Power-Generating Module which has been modified on or after 27 April 2019 to such an extent that it's Connection Agreement must be substantially revised or replaced for example a change to a technical appendix in a Connection Agreement.

The difference here is that the base regulation limits the application to type C and D but G99 implies application to all PGM Types. The potential step change in compliance conditions for small UK generators could be seen as a barrier to improving plant say for environmental reasons if that improvement also changes the power output, as power output is part of the technical appendices. For

example, let's take a 2MW gas reciprocating engine that undergoes a modification, say to the turbo, which results in better efficiency and a small increase in output power say 100kW. Now take a site with, a not unfeasible, 10 of these PGMs we now have a 1MW increase in output which is highly likely to require the Maximum Entry Capacity to be changed in the technical appendices. According to G99 this is then a large enough modification to trigger compliance from G59 to G99, however under RfG this would not and should not occur.

Also, there is the question of whether the ENA/G99 should be dictating what constitutes a substantial modification when Article 4 states that if the System Operator feels a NEW agreement is required then the Regulatory Authority will decide whether a NEW agreement or a revision to the existing is required along with which elements of RfG should apply.

(ii) if the relevant system operator considers that the extent of the modernisation or replacement of equipment is such that a new connection agreement is required, the system operator shall notify the relevant regulatory authority or, where applicable, the Member State; and

(iii) the relevant regulatory authority or, where applicable, the Member State shall decide if the existing connection agreement needs to be revised or a new connection agreement is required and which requirements of this Regulation shall apply

However, in light of Ofgem's previously broadcasted intentions to avoid this responsibility, this is not the main aim of this proposal.

3. Proposed Modifications

The proposal is simple, incorporate the wording of RfG into G99

*The requirements set out in this EREC G99 shall apply to Generators owning any **Type C or Type D** Power-Generating Module which has been modified on or after 27 April 2019 to such an extent that it's Connection Agreement must be substantially revised or replaced for example a change to a technical appendix in a Connection Agreement.*

4. Next Steps

The Panel is requested to discuss the proposed defect and decide on next steps.