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ACER - Agency for the Cooperation of Energy
Regulators
ATTN: Mr A. Potoschnig –Director-
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Comments to ACER on the Load Frequency and Reserve Net Code

Dear Mr Potoschnig,

We are writing to you in the name of the European gas and steam turbine industry and its political voice EUTurbines with reference to your request to submit comments to the NC LfCR.

EUTurbines is the voice of the European gas and steam turbine manufacturers employing 70,000 people across Europe with a turnover of 25 billion euros. Gas and steam turbines are the key element for future power generation offering the highest degree of fuel flexibility – from fossil fuels through nuclear energy to biomass. More details about our organisation can be found under: www.euturbines.eu.

We would like to bring the following important points to your attention and kindly ask you to take them into consideration:

I. General remark:

In general , we would like to ask not only to consult the owner of the LFC&R unit, but also the generation technology manufacturer, whenever a requirement that is applicable for the generating unit is likely to leave the scope of current NC RfG or NC LFC&R. We would like to repeat our message on the NC RfG where we advocated for a role of technical advisors for manufacturers to be mentioned in the NCs.

Art 36.6

6. Each FCR Providing Unit and each FCR Providing Group shall comply with the required properties for FCR according to Article 36(1) and Article 36(2) and shall activate the agreed FCR in accordance to Article 36(1) and Article 36(2) by means of a proportional governor reacting to frequency deviations or alternatively based on a monotonic piecewise linear power-frequency characteristic in the case of relay activated FCR.

We agree that it shall be a monotonic piecewise linear power-frequency characteristic but we would like to ask for a more concise formulation of the sentence and a better explanation that the curve (which is not necessarily linear) can be a characteristic being the sum of several contributors.

Art.44. table 4

Amendments to the following articles are highlighted in bold:

Minimum accuracy of measurement is *“10mHz or the industrial standard if better”*. For more clarity we would suggest to add a +- in front of the sentence: *“±10mHz or the industrial standard if better”*, and clarify other values contained in the table in the same way.

“Maximum combined effect of inherent frequency response insensitivity and possible intentional deadband”. The respective values seem to us more restrictive and inconsistent with NC RfG in Art.10 table 4. Please make sure that the LfCR and the RfG are consistent in this matter.

Additionally, the FCR full activation frequency deviation for Ireland is unclear and terms not defined.

Art. 44.2.

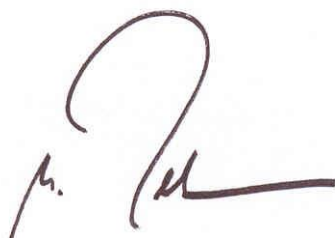
We would like to modify the following sentence by adding: **“For the introduction of additional properties a transition period upon consultation with affected FCR providers and generating unit manufacturers shall be foreseen”**.

Art 44. 3.

This paragraph deals with **“additional requirements for FCR”** which can be required by a reserve TSO. EUTurbines suggests adding as done on the previous article: **“For the introduction of additional properties a transition period upon consultation with affected FCR providers and generating unit manufacturers shall be foreseen”**

Should you have any queries on our comments please do not hesitate to contact us.

Kind regards,

A handwritten signature in dark ink, consisting of a large, stylized initial 'M' followed by a series of connected loops and a horizontal stroke at the end.

Matthias Zelinger

- Secretary General of EUTurbines -