

EUROMOT - Presentation

ACER Workshop NC RfG – 03 September 2012



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EUROMOT

This is Euromot



- **EUROMOT is the European Association of Internal Combustion Engine Manufacturers.**
- **We are a not-for-profit organization to serve the interests of the IC engine manufacturers supplying the EU market.**
- **We are a centre of excellence and knowledge for the IC engine industry in all matters related to worldwide product regulation, operating at a pre-competitive level.**
- **We have been supporting our members since 1991 by providing expertise and up-to-date information, and by campaigning on their behalf for internationally aligned legislation.**
- **EUROMOT is a European Interest Representative.**
Our identification number in the EU Transparency Register is 6284937371-73.

Euromot Member Companies

					DAIMLER		
					HONDA		
							
							
							

Diesel & Gas Engine Manufacturers (CI / SI)



- **AGCO POWER**
- **BRIGGS & STRATTON**
- **CASE NEW HOLLAND**
- **CATERPILLAR POWER SYSTEMS GROUP**
- **CUMMINS ENGINES**
- **DAIMLER**
- **DEUTZ**
- **FPT INDUSTRIAL**
- **GE ENERGY & TRANSPORTATION**
- **HATZ**
- **HONDA EUROPE**
- **JCB POWER SYSTEMS**
- **JOHN DEERE**
- **KOMATSU ENGINES**
- **LIEBHERR**
- **LOMBARDINI – KOHLER GROUP**
- **MAN GROUP**
- **MHI EQUIPMENT EUROPE**
- **MOTEURS BAUDOIN**
- **MWM**
- **ROLLS-ROYCE**
- **SAME DEUTZ-FAHR**
- **SCANIA**
- **STEYR MOTORS**
- **TOGNUM**
- **VOLKSWAGEN INDUSTRIAL ENGINES**
- **VOLVO CONSTRUCTION EQUIPMENT**
- **VOLVO PENTA**
- **WÄRTSILÄ**
- **YANMAR GROUP**

Experience ENTSO-E Network Code for Generators

Unique integration work, involving many European stakeholders

- **Public and open work process**
 - Contribution from many stakeholders essential
- **Results will be binding through legislation across EU**
 - High importance and impact not clear to everyone.
- **Rigorous and time consuming drafting process**
 - Beneficiary to the results – sufficient time is needed.
- **The devil is in the detail - definitions have to be 100% clear**
- **Current NC have general approach, details on national TSO level**
 - Too many items decided locally reduces the commonality effect.

→ **EUROMOT is concerned with the treatment of FRT and CHP**

ENTSO-E Network Code for Generators, Specific Notes (Combined Heat and Power Production, CHP)

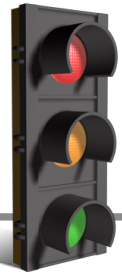


Equivalent treatment of different types of Cogeneration Units.

- EUROMOT welcomes the Intent in Article 3.6.h. The wording, however, is too restricted.
- Many CHP plants do not work with steam as heat source but with other solutions, e.g. hot water.
- CHP plants producing hot water should be eligible for the same treatment under Article 3.6.h as CHP units producing steam.

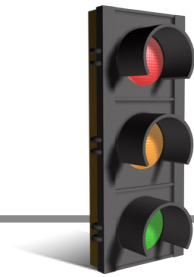
EUROMOT urges ACER to change the wording in Article 3.6.h to cover also other CHP solutions.

ENTSO-E Network code for Generators, Specific Notes (FRT) I



- **EUROMOT agrees that a reasonable FRT requirement is important for security of supply especially on transmission system level**
- **Extreme and unlikely boundary conditions should however not be the base for requirements. Example: 250 ms fault clearing time;**
- **Transmission system faults are usually required to be cleared in the order of 80-140 ms EUROMOT strongly recommends that this level should form the technical base for the requirement.**

ENTSO-E Network code for Generators, Specific Notes (FRT) II

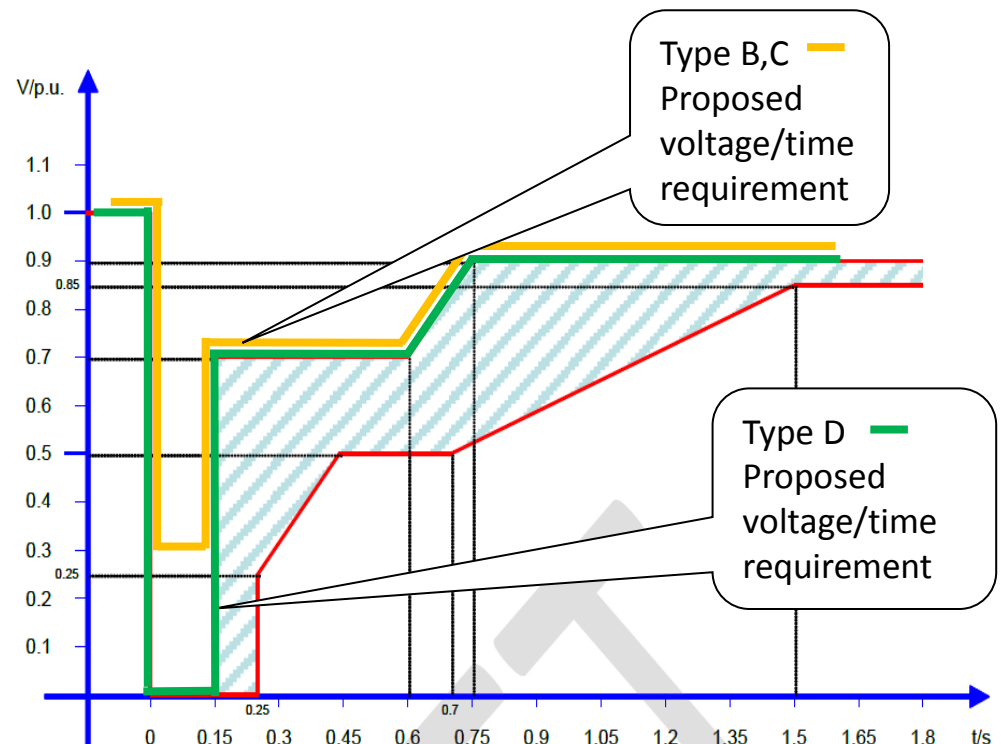


Proposal for a Fault Ride Through (FRT) requirement, fulfilling:

- 1) The needs for security of supply
- 2) Optimization between highest overall efficiency and lowest total cost for all involved parties.

Type D; Transmission system > 110 kV
Maximum Fault time: 150 ms,
Residual voltage at fault:
0-20% of nominal voltage.

Type B,C; Distribution system < 110 kV
Maximum Fault time: 150 ms
Residual voltage at fault:
30% of nominal voltage.



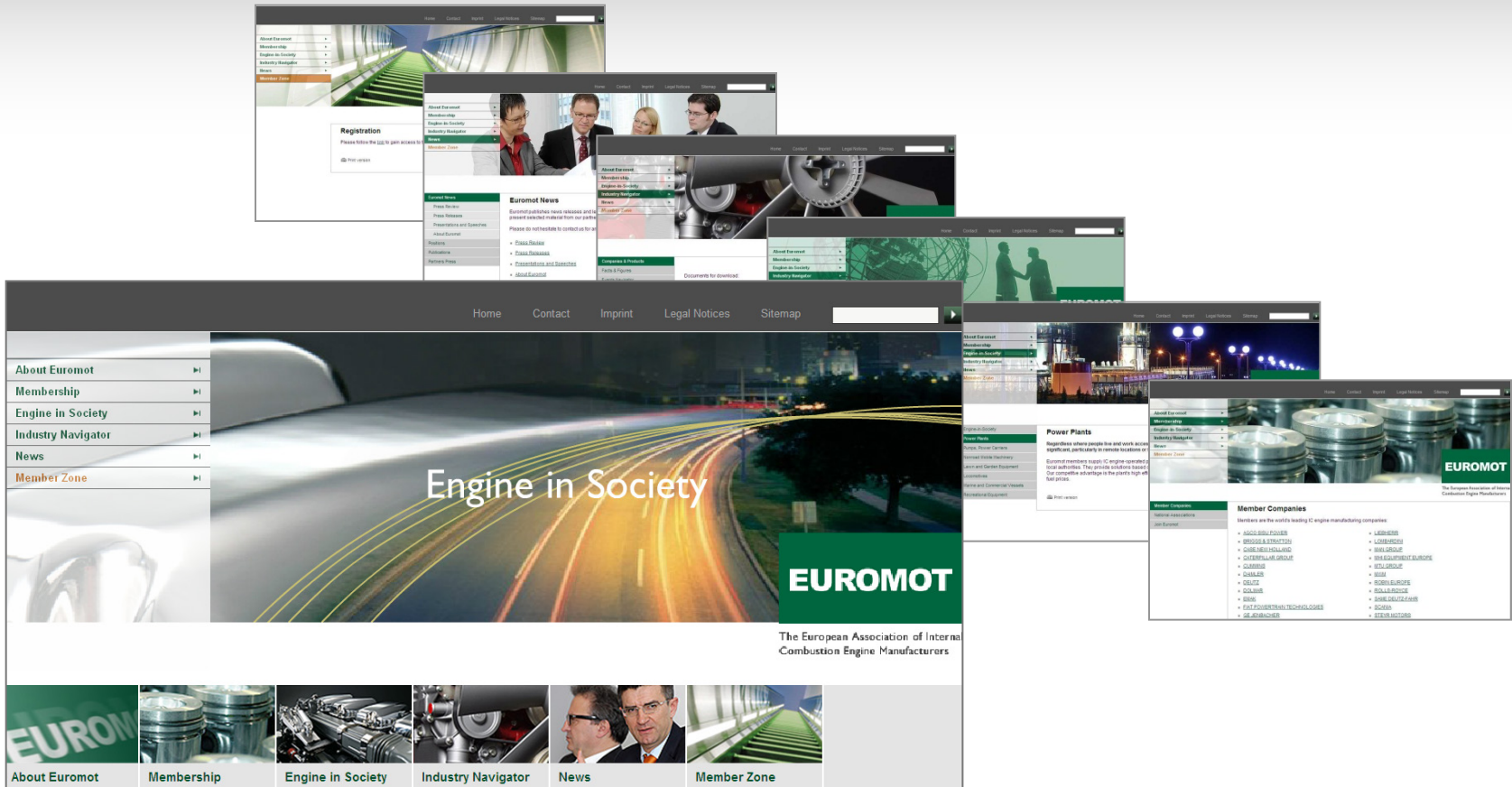
Conclusion and Recommendations

- **The burden of harmonizing network codes has to be reasonable for all stakeholders**
- **Euromot requests ACER to reconsider the treatment of CHP (Article 3.6), and FRT (Article 9.3, Article 11.3) in the NC RfG**
- **Level of detail as now proposed may not be sufficient to facilitate a reasonable standardisation across Europe**
- **Continuous dialogue between ENTSO-E, regulatory bodies, organisations, users and manufacturers is recommended in order to ensure that all aspects are evaluated and feedback is collected.**
- **As the NC RfG will be incorporated into “law” clear guidance on code interpretation should be an integral part of the code development process. EUROMOT recommends to continuously develop the supporting documents and to fully integrate them into process.**
- **Continuous extensive information and training seminars are needed**

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