



GEODE POSITION ON ERGEG PUBLIC CONSULTATION PAPER TOWARDS VOLTAGE QUALITY REGULATION IN EUROPE

GEODE welcomes, in general, ERGEG initiative to revise CENELEC European standard on voltage quality parameters EN 50160 for medium and low voltage.

GEODE agrees with ERGEG proposal to better define some voltage quality parameters in order to achieve the widest international consensus between distributors, manufacturers and consumers, to establish standard values of wave form and also for long interruptions values like SAIDI, SAIFI and MAIFI. However harmonise definitions and values around Europe of the mentioned parameters, should reflect the average parameters applied in the different Member States, escaping from the extremes positions that reflect the highest or the lowest quality parameters in Europe. A tendency to harmonise definitions and values by requesting the highest quality parameters applied in Europe would not be realistic not practicable.

GEODE supports ERGEG proposal to extend the standard on voltage quality to every voltage level, including high voltage and extra-high voltage levels.

GEODE considers that the geographical differences within Europe should be taken into account necessarily, in order to create different zones with different quality levels because, very often, meteorology seriously affects voltage events, with important differences around countries, as Europe is a large territory. To avoid that, a suggestion could be to establish regional areas with similar geographical conditions, to determine acceptable values for voltage events.

GEODE as the association of distributors (network companies) points out that voltage quality standards have to be acceptable and affordable in economic terms, taking into account the ratio costs/benefits. To request very high levels of voltage quality to be fulfilled by network companies represents significant costs for them to satisfy the needs of a customers minority. It is a key issue to identify a "satisfactory" voltage quality level for the majority of the customers. The quality standard level has to be known by the customer. Then, in case a customer needs a higher level of voltage quality than the standard level, because of its activity, the customer itself should assume the cost, as it is the most efficient solution for the system.

According to it, **GEODE** supports ERGEG proposal of power quality contracts to be settled with a concrete customer (submitted to regulator's control, if needed). However it has to be taken into account before connecting the new customer to the grid, that the rights of existing customers can not be affected by the new entrant. The cost of preventing or correcting possible new disturbances must be supported by the new customer.

At the same time it has to be guaranteed that the equipment fulfill or are prepare to assume the same voltage quality standards requested to network companies in the country to be installed or at European level in case voltage quality standards are harmonised.



Voltage quality standards measurement represents important costs for network companies. Then, these costs have to be identified and included in the distribution tariffs. The most ambitious quality standards are required, the highest costs for the network company. Then it has to be decided who pays for it.

The equipment to measure quality standards are expensive and have to be installed at the customers site. It means millions of units to be installed, on a customer by customer basis.

For instance, in Italy and Spain it has been settled by Law the obligation to replace all meters by new units ready to provide a huge amount of data on voltage quality. Of course such a measure represents significant costs.

GEODE considers that the investment of quality voltage starts at the customer installation and ends at the grid following these examples.

- 1.- The distributor must achieve a standard quality of a specific zone.
- 2.- Household and industrial customers should install necessary measures to solve individually possible voltage quality problems, higher than the standards, like small UPS equipment installed in concrete parts of an industrial process.

An inverted situation is in comparison extremely expensive. For instance, to install a small UPS for a small shop prevents the network company from an important investment in the grid to avoid a very short failure.

As conclusion **GEODE** supports CENELEC technical standards as they are the result of a wide consensus between distributors (network companies), manufacturers and customers.

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