



Mike Small
BDR Thermea Group B.V.
Kanaal Zuid 106, Apeldoorn, 7332 BD, The
Netherlands
Mob: +44 7917 613 363

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Copy:

Public Utilities Commission of Latvia (PUC)
45 Ūnijas Street, Riga, LV-1039, Latvia

**National Commission for Energy Control and
Prices (NCC)**
Verkiu str 25C-1, LT-08223 Vilnius, Lithuania

Document is forwarded by e-mail to Mike.Small@BDRThermea.com

*CC: sprk@sprk.gov.lv
rastine@regula.lt*

**BDR Thermea Group B.V. request -
installed capacity for recording future
sales and installed capacity**

Estonian Competition Authority received on 22.05.2017 your e-mail, where was asked an advise on any necessary procedures (in English) that BDR Thermea Group B.V. needs to follow for recording future sales and installed capacity.

Establishment of thresholds for classification as emerging Technologies are stipulated in Article 67 of Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators (hereinafter *RfG*).

The cumulated total effective output of a technology within a synchronous area of power-generating modules already sold may not exceed¹ 25% of 4.427 MW (see below), thus $4.427 \text{ MW} \times 0,25 = 1.107 \text{ MW}$. **According to BDR Thermea Group B.V. statements, in Baltic synchronous area there are no “eVita” power-generating modules sold so far -** thus, at the current stage the cumulative total capacity of “eVita” devices sold so far is 0 MW.

RfG Article 67 section 1 stipulates, that the maximum level of cumulative maximum capacity of power-generating modules classified as emerging technologies in a synchronous area shall be 0,1 % of the annual maximum load in 2014 in that synchronous area.

¹ Article 66 (2) c of RfG

Country values in MW on the days of highest and lowest ENTSO-E load values ^{1,2}

	29.01.14 at 19:00	17.08.14 at 07:00		29.01.14 at 19:00	17.08.14 at 07:00		29.01.14 at 19:00	17.08.14 at 07:00
AT	11 021	5 013	FR	82 463	29 493	MK	1 335	619
BA	1 908	941	GB³	56 865	19 955	NI⁴	1 568	529
BE	12 729	6 836	GR	7 585	4 657	NL	17 270	8 457
BG	6 796	2 927	HR	2 746	1 525	NO	20 991	9 755
CH	7 445	3 500	HU	5 735	3 092	PL	23 297	10 912
CY	610	483	IE	4 255	1 830	PT	7 231	3 950
CZ	9 868	4 560	IS	2 131	1 869	RO	8 006	4 129
DE	80 660	37 470	IT	49 930	19 758	RS	6 663	2 660
DK	5 837	2 523	LT	1 740	872	SE	23 938	10 185
EE	1 447	711	LU	779	377	SI	2 129	1 257
ES	37 540	19 487	LV	1 240	577	SK	4 005	2 237
FI	13 733	6 905	ME	547	292	*	522 043	230 343

*** ENTSO-E**

¹ Calculated load values as sum of the ENTSO-E member TSOs' countries.

² All values are calculated to represent 100% of the national values.

³ All data with the country code GB represents monthly statistical data as sum of England, Scotland and Wales.

⁴ All data with the country code NI represents the monthly statistical data of GB Northern Ireland.

Fig.1 Source ENTSO-E Statistical Factsheet 2014².

$$\text{Max level}_{\text{Att67I}} = (1447+1740+1240) \text{ MW} \times 0.1\% = 4.427 \text{ MW}$$

Thus, the **maximum level** of cumulative maximum capacity of power-generating modules classified as emerging technologies in **Baltic synchronous area is 4.427 MW**.

² https://www.entsoe.eu/Documents/Publications/Statistics/Factsheet/entsoe_sfs2014_web.pdf , Page 13

Net generation 2014¹

	Thermal nuclear	Fossil fuels	of which lignite	of which hard coal	of which gas	of which oil	of which mixed fuels	of which other fossil fuels	Renewable	of which wind	of which solar	of which biomass	of which other renewable	Hydraulic	of which renewable	of which other hydro	Other sources	Total
	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh	TWh
AT ²	–	11.2	–	3.0	5.2	0.6	–	2.5	5.8	3.0	–	–	2.8	40.2	36.3	3.8	8.3	65.5
BA	–	8.7	8.7	–	–	–	–	–	–	–	–	–	–	5.7	5.7	–	–	14.5
BE ³	32.1	22.4	–	4.0	18.3	0.04	–	–	11.8	4.4	2.8	4.5	–	1.4	0.3	1.2	–	67.7
BG	14.7	19.6	15.6	2.4	1.6	–	–	–	2.7	1.3	1.2	0.1	–	4.7	4.2	0.5	–	41.7
CH ^{4,5,6}	26.4	2.1	–	–	–	–	–	2.1	2.0	0.1	–	–	1.8	39.3	–	39.3	–	69.7
CY ⁷	–	4.0	–	–	–	4.0	–	–	0.2	0.2	–	–	–	–	–	–	–	4.2
CZ	28.6	41.7	32.6	4.6	4.4	0.05	–	0.1	6.8	0.5	2.1	1.8	2.4	3.0	1.9	1.1	–	80.0
DE ⁸	91.8	306.0	148.7	102.8	38.2	1.3	14.9	–	126.9	55.2	34.8	35.5	1.4	23.9	16.4	7.4	–	548.5
DK	–	14.6	–	10.8	3.8	0.05	–	–	16.0	13.1	0.6	2.3	–	0.02	0.02	–	–	30.6
EE ⁹	–	9.6	–	–	–	–	–	9.6	1.3	0.6	–	0.7	–	0.03	0.03	–	–	10.9
ES	54.8	99.2	4.5	39.3	46.2	9.2	–	–	69.8	51.0	13.1	5.7	0.001	42.4	38.5	3.9	0.2	266.5
FI	22.7	16.6	–	8.2	5.2	0.2	3.0	–	12.1	1.1	–	11.0	–	13.2	13.2	–	0.8	65.4
FR	415.9	27.4	–	8.3	14.4	4.8	–	–	29.6	17.0	6.0	6.6	–	68.4	62.9	5.5	–	541.2
GB ^{5,10}	59.9	212.4	–	103.8	87.3	0.01	–	–	35.3	21.2	–	–	–	7.8	3.8	2.9	–	363.6
GR ¹¹	–	29.1	22.7	–	6.5	0.001	–	–	7.1	3.0	3.9	0.2	–	4.6	0.7	3.9	–	40.8
HR	–	2.9	–	2.1	0.4	–	0.3	–	0.7	0.7	–	–	–	8.3	8.3	–	–	12.0
HU	14.6	8.9	5.5	0.6	2.7	0.04	–	–	2.3	0.6	0.01	1.7	–	0.3	0.3	–	–	26.1
IE	–	18.2	2.6	3.9	11.6	0.02	0.1	–	5.4	5.1	–	–	0.2	1.0	0.7	0.3	–	24.5
IS	–	0.0	–	–	–	–	–	–	4.9	–	–	–	4.9	12.8	12.8	–	–	17.7
IT	–	160.0	–	35.2	93.3	17.3	11.3	2.8	48.9	15.1	23.3	5.0	5.6	58.0	55.0	3.1	–	266.9
LT	–	1.9	–	–	1.1	–	0.7	0.2	1.1	0.6	0.1	0.3	–	1.1	0.4	0.7	–	4.1
LU	–	1.4	–	–	1.4	–	–	–	0.2	0.1	0.1	0.1	–	1.2	0.1	1.1	0.1	2.8
LV ⁵	–	2.3	–	–	1.7	–	0.6	–	0.8	0.1	–	0.3	0.3	2.1	2.1	–	–	5.1

Fig. 2 Source ENTSO-E Statistical Factsheet 2014³.

RfG Article 67 section 2 stipulates, that the maximum level of cumulative maximum capacity of power-generating modules classified as emerging technologies is calculated by multiplying the maximum level of cumulative maximum capacity of power-generating modules classified as emerging technologies of a synchronous area with the ratio of annual electrical energy generated in 2014 in the Member State to the total annual electrical energy generated in 2014 in the respective synchronous area to which the Member State belongs.

The **maximum level of cumulative maximum capacities of power-generating modules classified as emerging technologies** in each member state of Baltic synchronous area (Article 67 section 2 RfG) are accordingly:

$$\text{Max level Estonia}_{\text{Art67 II}} = 4.427 \text{ MW} \times \frac{10.9(\text{TWh})}{20.1(\text{TWh})} = \mathbf{2.401 \text{ MW}}$$

$$\text{Max level Latvia}_{\text{Art67 II}} = 4.427 \text{ MW} \times \frac{5.1(\text{TWh})}{20.1(\text{TWh})} = \mathbf{1.123 \text{ MW}}$$

$$\text{Max level Lithuania}_{\text{Art67 II}} = 4.427 \text{ MW} \times \frac{4.1(\text{TWh})}{20.1(\text{TWh})} = \mathbf{0.903 \text{ MW}}$$

³ https://www.entsoe.eu/Documents/Publications/Statistics/Factsheet/entsoe_sfs2014_web.pdf, Page 3

Recording of sales numbers

In order to follow the recording rules of future sales BDR Thermea Group B.V. shall follow Article 70 of RfG,

Article 70 section 1 stipulates, that from the date of the decision of the regulatory authorities pursuant to Article 69(1), the manufacturer of any power-generating module classified as an emerging technology shall submit to the regulatory authority **every two months an update of the sales of the module per Member State for the past two months.**

BDR Thermea Group B.V., keeping in mind the aim the Art 70 (1) of RfG, should submit the sales data as following:

Art 70 (1) of RfG sales data regarding **Estonia** onto e-mail address: info@konkurentsiamet.ee ;

Art 70 (1) of RfG sales data regarding **Latvia** onto e-mail address: sprk@sprk.gov.lv ;

Art 70 (1) of RfG sales data regarding **Lithuania** onto e-mail address: rastine@regula.lt .

First of all, each regulatory authority needs the sales data for its territory in order to make publicly available the cumulative maximum capacity of power-generating modules classified as emerging technologies in respective Member State (i.e BDR Thermea Group's Estonian sales data for Estonian NRA etc).

Secondly, NRAs need this data in order to follow Art 69 sec 2 of RfG, whereby, in the event that the cumulative maximum capacity of all power-generating modules classified as emerging technologies connected to networks exceeds the threshold established in Article 67, the classification as an emerging technology could be withdrawn by the relevant regulatory authority. The withdrawal decision will be published.

Sincerely

(digitally signed by)

Väino Siilbek
+372 667 2400
Vaino.Siilbek@konkurentsiamet.ee