

GETTING THE F-GAS REGULATION TO FULFIL ITS POTENTIAL TOWARDS CLIMATE-NEUTRAL POWER GRIDS

The power industry fully embraces the EU's climate and energy policy objectives. We contribute towards these objectives by accelerating the energy transition for a power system based on renewable energy sources (RES). We are likewise committed to transitioning to a sustainable management and operation of our assets. This is possible only with proven and reliable switchgear.

In this vein, we strongly support the European Commission's aim to phase out SF₆-based technologies after a transition period for the different voltage levels which ensures that alternative applications are sufficiently available on the market and tested in the grid operation. We are committed to using up to 100 per cent SF₆-free applications when available.

When adequately designed, the revised European F-gas Regulation can achieve its ambition while also ensuring planning certainty for network operators and utilities for the deployment of the RES and network development. To do so, the following aspects must be considered:

▪ **ENSURING SUPPLY AND MARKET AVAILABILITY AS WELL AS TECHNOLOGY SECURITY OF ALTERNATIVE SOLUTIONS:**

Transition phases must be sufficiently long to ensure the market can provide sufficient assets with alternative technologies within reasonable delivery times and sufficient maturity. In case the market cannot provide for sufficient and mature switchgear within reasonable delivery times (especially in the first years after a ban of SF₆) important infrastructure projects required for the energy transition could be delayed. Network operators are obliged to set very high requirements for the reliability and availability of their assets. However, experience shows that new technologies require a break-in phase during which unforeseen problems may occur and reduce their availability. Thus, it is essential for any new technology not only to pass the required certification tests but also to **demonstrate good performance under operating conditions**. We recommend an **availability of fully tested applications by at least two suppliers to guarantee a minimum level of competition**.

In the present Commission proposal, the market availability considering maturity and delivery times of installations is not considered at all. **As a consequence, the transition phases should be reconsidered for all voltage levels, taking into account the fact that network operators need several years to fully introduce new systems. Moreover, we recommend that, in addition to technical grounds, the exemptions also take into account market availability of alternative applications.**

→ We therefore propose the following amendment to Annex 4, No. 23:

EC proposal	Amendment proposal
23) a) - d): [...] unless evidence is provided that no suitable alternative is available based on technical grounds [...]	23) a) - d): [...] unless evidence is provided that no suitable alternative is available based on technical grounds or due to unreasonable delivery times leading to a delay of the grid expansion project [...]
2. The evidence referred to in point 23, shall include documentation establishing that following an open call for tender no suitable alternative on technical grounds, given the demonstrated specificities of the application, was available that could meet the conditions set out in point 23. The documentation shall be kept by the operator for at least five years and shall be made available to the competent authority of the Member State and to the Commission, upon request.	2. The evidence referred to in point 23, shall include documentation establishing that following a an open call for tender: (a) no suitable alternative on technical grounds (i.e. equipment that was successfully in operation at least in pilot projects), given the demonstrated specificities of the application, was available that could meet the conditions set out in point 23, or (b) a minimum of two suppliers which can provide a suitable alternative on technical grounds (i.e., equipment that was successfully in operation at least in pilot projects), was not available, or (c) the product delivery cannot meet the timeline of the project. The documentation shall be kept by the operator for at least five years and shall be made available to the competent authority of the Member State and to the Commission, upon request.

▪ **ENABLING PROCUREMENT AND USAGE OF SPARE PARTS AND COMPONENTS FOR EXTENSION OF EXISTING SWITCHGEAR:**

Servicing, maintenance, repairs and extensions are necessary in order to maintain or restore the safety and functionality of existing switchgear. Therefore, **spare parts for and extensions of existing assets must be explicitly exempted until the asset has reached the end of its technical life span.** A ban on spare parts would lead to a possible decommissioning of installations even in the case of minor repairs. Parts of the products and equipment hence must be allowed to be purchased and placed on the market even after the end of the specified phase-out period. Should network operators not be allowed to purchase spare parts, even small damages can result in outages or shutdowns with economic and ecological consequences. **Moreover, it is extremely important to reduce the repair time to a minimum to maintain system security.** An early replacement of equipment before its technical end of life is likely to delay or postpone infrastructure projects which are essential for the energy transition as resources will be focused on such replacements.

▪ **APPROPRIATE DEFINITION OF “PLACING ON THE MARKET” (POM):**


An **appropriate definition of the term "POM" is required for planning certainty** in particular for electrical switchgear. The current definition of "POM" according to Art. 3(6) in conjunction with Art. 11(1) and Annex IV No. 23 is applicable to consumer goods, but unsuitable for the procurement and prequalification processes required for network assets. **Network operators' project durations (usually several years) and the required market and supply availability of mature products must be considered for planning certainty.** To address this, "POM" must refer to the contractually assured delivery date of the electrical switchgear.

→ We therefore support the ITRE AMs 9, 121 to 125; Article 11(1) and suggest to add the following to these:

EC proposal	Amendment proposal
The placing on the market of products and equipment, including parts thereof, listed in Annex IV, with an exemption for military equipment, shall be prohibited from the date specified in that Annex, differentiating, where applicable, according to the type or global warming potential of the gas contained.	The placing on the market of products and equipment, including parts thereof , listed in Annex IV, with an exemption for military equipment, shall be prohibited from the date specified in that Annex, differentiating, where applicable, according to the type or global warming potential of the gas contained. The decisive date is the contractually assured delivery date.

→ Furthermore, we support the ITRE AMs 291 to 293; Annex 4, No. 23:

EC proposal	Amendment proposal
	2a. The prohibitions on placing on the market set out in point 23 do not apply to the spare parts necessary for the maintenance and repair of equipment already installed and for the extensions of the already installed gas-insulated switchgear.

 50Hertz Transmission GmbH	 Amprion GmbH	 Austrian Power Grid AG	 Bundesverband der Energie- und Wasserwirtschaft e.V.	 Elia Transmission Belgium
 EnBW Energie Baden-Württemberg AG	 E.ON	 Netze BW GmbH	 Österreichs E-Wirtschaft	 Stadtwerke München GmbH
 TenneT	 Transnet BW GmbH	 Vattenfall	 Verband kommunaler Unternehmen e.V.	 Verband kommunaler Unternehmen Österreichs