



Low Carbon Ukraine

Policy advice on low-carbon
policies for Ukraine

Policy Briefing #5

Supported by:



Federal Ministry
for the Environment, Nature Conservation
and Nuclear Safety

based on a decision of the German Bundestag

Local curtailment charges for RES

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Berlin 2019

Implemented by

 Berlin
Economics

Key Messages

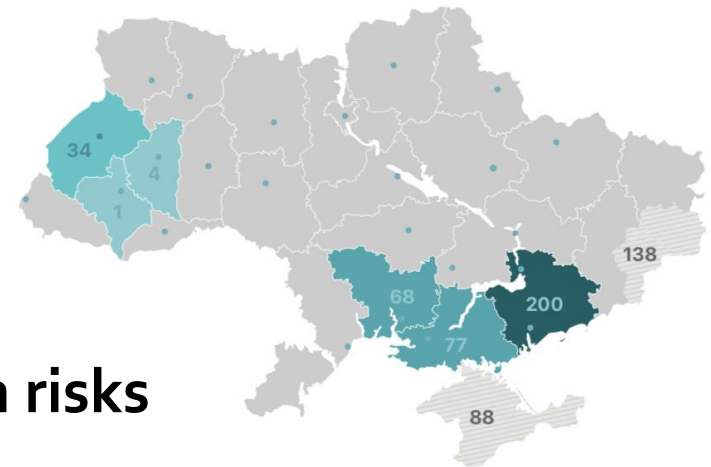
- 1 The concentration of wind and solar power plants in high-yield regions will increase balancing needs and grid constraints
- 2 Most mechanisms to guide investors location selection, such as connection charges, are inflexible and leave room for discretionary power
- 3 We recommend introducing a transparently set curtailment charge mechanism for new RES installations

Motivation

- Without regulation, investors tend to choose the locations with the highest expected energy yields:
 - High wind speed
 - High solar radiation
- This leads to a geographical concentration and hence **short-term risks** for the Ukrainian electricity system:

- High utilization of grids in respective regions that may cause bottlenecks
- Increasing balancing needs due to the regional correlation of energy yields

Figure: Distribution of wind PP (in MW)



Source: Dixi (2018) Renewable energy in Ukraine

Existing locational control methods face disadvantages

- Three types of locational control methods applied in other countries:
 - A) Locational differentiated network and/or connection charges
 - B) Regional RES development bans/limits
 - C) Regionally differentiated RES tariffs
- Potential disadvantages of these methods are:
 - ☐ Can give DSO/TSO/regulator substantial discretionary power, especially when calculated in an *ad hoc* non-transparent way
 - ☐ Risk of non-economic aspects dominating decisions

We recommend alternative: Regional curtailment charges

- **Regional curtailment charges**
 - are based on a transparent & simple formula
 - are a penalty on the auctioning result in EUR / megawatt-hour
 - depend on actual curtailment losses in the respective region
- **Their price reflects the level of congestion at the time when a new installation is connected**
 - If the level of congestion changes, curtailment charges for **new** installations change but not for existing ones.
- **For simplification start with limited regional granularity (e.g. TSO regions or Oblasts)**
- **Revenues resulting from charges should be used for grid improvements**

Regional curtailment charge: Formula for Wind

The curtailment charge (in EUR/MWh) for new installations is set depending on **curtailment losses** in the respective region based on the value of the previous year (in %) and the **latest auctioning results** (in EUR/MWh)

$$\text{curtailment charge} = \text{last year curtailment loss} * \text{latest auctioning result}$$

CC_t^r - curtailment charge in EUR/MWh, in year t , in region r

s_{t-1}^r - share of curtailment losses in regional wind generation, in previous year $t-1$, in region r

p_{t-1} - price base in EUR /MWh, in year $t-1$; latest auction result

$$CC_t^r = s_{t-1}^r \cdot p_{t-1}$$

Regional curtailment charge: Example for Wind

- High wind yield in **region A** => low generation cost (46 EUR/MWh) => high deployment of wind generators
- This concentration resulted in high wind curtailment (10%)
- Lower wind yield in **region B** => higher generation cost (48 EUR/MWh) => lower deployment of wind generators => lower wind curtailment losses (2%)
- If RES-auction in Ukraine clears at 50 EUR/MWh
 - Most competitive projects from region A should be out
 - Most competitive projects from region B would be in

Region	Generation cost of new wind turbine	Curtailment losses for wind installations	Curtailment Charge	Maximum bidding price in auction
	(LCOE) EUR/MWh	%	EUR/MWh	EUR/MWh
A	46	10%	5 (10% x 50)	51 (5 + 46)
B	48	2%	1.0	49

Advantages and disadvantages of curtailment charges

- + Reflects regional challenges resulting from high share of renewables by considering curtailment losses
- + Simple and transparent method without discretionary power of any market actor
- + Terminable (e.g. for first five year of plant operation)
- + Charges automatically decline if grid constraints disappear
- As each locational signal, does not reflect total system costs and might hinder RES development in most efficient regions



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Annex

Subsumption: Total energy system costs

In the **long-term**, renewable energy sources should be located such that the **total energy system cost** are minimized

- Total energy system costs = Sum of investments in
 - Power capacities
 - Networks
 - Storage capacities
 - And additionally variable costs for e.g. fuels and maintenance

In **short-term**, Ukraine has to avoid binding grid constraints and has to minimize balancing needs to limit system costs

Internationally used typical location control solutions

» **A) Locational differentiated network and/or connection charges**

To appropriately finance network expansion and guide the location of RES

» **B) Regional RES development bans/limits**

Regulation, that either ban's new renewable energy projects in regions with insufficient transmission or defines capacity limits for each region

» **C) Regionally differentiated RES tariffs**

Method that enables an adjustment of tariffs depending on the system value of the produced electricity

A) Locational differentiated connection charges

- **Connection charges** are one-off payments for generators of RES
- Charges can apply for distribution and transmission grids

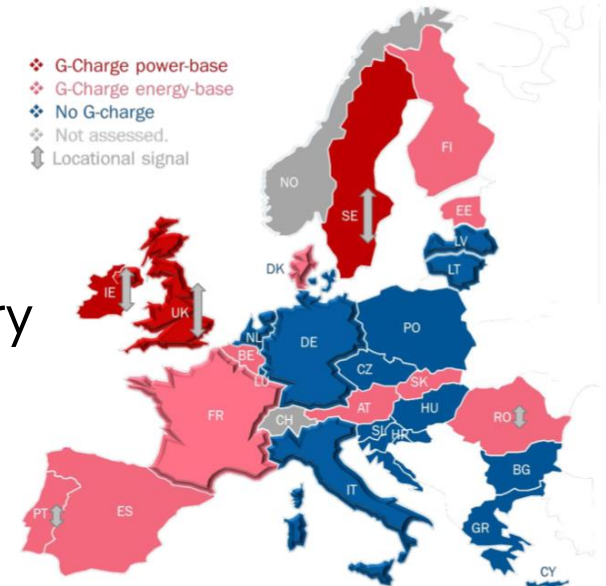
At the transmission level, differentiated charges can also present locational signals*

- ENTSO-E definitions classification
 - **Super-shallow:** All costs are socialized via the tariff, no costs are charged to the connecting entity;
 - **Shallow:** grid users pay for the infrastructure connecting its installation to the transmission grid (line/cable and other necessary equipment);
 - **Deep:** shallow + all other reinforcements/extensions in existing network, required in the transmission grid to enable the grid user to be connected
- Ukrainian DSO-connection charges reflect regional power load
- But connection charges in Ukraine do not send a location signal

** EWEA (2016) EWEA position paper on network tariffs and grid connection regimes*

A) Locational differentiated network charges

- **Network charges for RES generators** can be defined:
 - Energy-based (per kWh)
 - Power based (per kW)
- Charges can be fixed for the whole territory or vary depending on the **location**
- **Five EU countries** apply location-based charges: Ireland, UK, Portugal, Sweden and Romania
- **No network-charges for RES generators** in Germany, Italy and Poland for example
- Producers do not bear network charges in Ukraine



Source: EWEA (2016) EWEA position paper on network tariffs and grid connection regimes

B) Regional RES development bans

- Grid operators may prohibit the connection of new RES power facilities to the grid
- Bans **typically limited in time** till grid expansion takes place
- Often discretionary non-transparent decision of network operator

Example UK:

- The DSO (in UK DNO) for the Midlands, south-west England and Wales, has closed the grid to new large renewable projects in Cornwall, Devon, Somerset and Dorset for up to six years*
- In Ukraine, DSOs can block new installations to avoid grid constraints - and the corresponding rules are not transparent

** The Guardian (2015), UK electricity grid holds back renewable energy, solar trade body warns*

B) Regional RES development limits

- Restrictions on the amount of (RES) capacities in each region
- Can be defined as
 - Total capacity limit in a given year and region (i.e., stock)
 - Limit for the annual construction in a given year and region (i.e., flow)

Example Turkey:

- Renewables projects in Turkey must be built in designated regions with identified transformers or sub-stations*

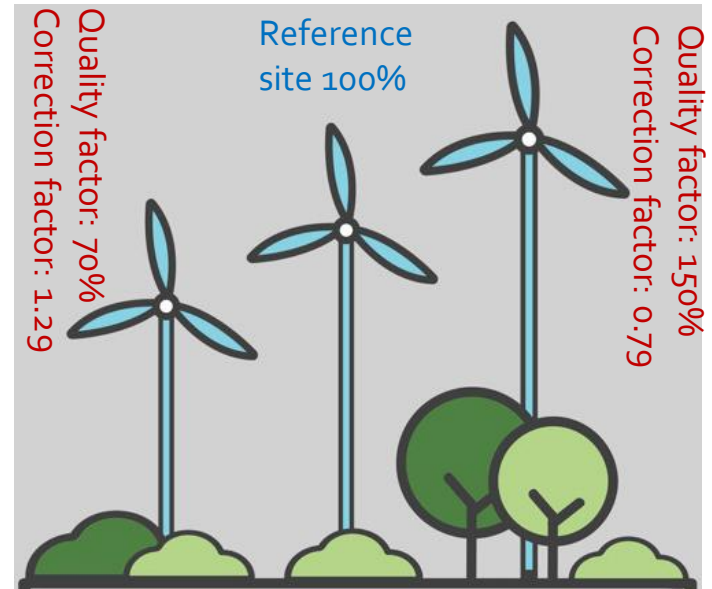
** BloombergNEF (2018), ClimateScope 2018*

C) Regionally differentiated RES tariffs

- Instead of adjusting the network cost, countries can also directly adjust the tariffs for RES depending on their location or generation profile

Example Germany - The reference yield method

- A reference site (100%) is defined
- Sites with lower average yields than the reference site get proportionately higher tariffs
- Consideration of different plant types needed
- Investors are not incentivised to chose locations with the highest energy yield. This should reduce local concentration.



Assessment of methods

- **First-best** solution for defining regional RES and grid development would be based on a “**total system cost minimization approach**”
 - Thus, all presented methods are only “**second-best**” compared to a “total system cost minimization”
 - In contrast to the first-best approach they can be introduced relatively quickly and effectively avoid local RES concentrations
- For Ukraine a **quickly implementable** method is needed to avoid RES deployment being jeopardised by non-transparent discretionary measures by the system operators.

All presented methods have advantages and disadvantages

A) Locational differentiated network and/or connection charges

- + Price signals can provide granular incentives (good installations still being built in constraint areas)
- + Network charge setting should follow a transparent process (proposed by DSO/TSO; approved by regulator)
- DSO/TSO still have substantial discretionary power

B) Regional RES development bans/limits

- + Bans are very effective
- Bans might be set in a very non-transparent way by DSOs/TSOs
- + Limits can be set by government in a politically transparent way
- But risk of non-economic aspects dominating decisions

C) Regionally differentiated RES tariffs

- + Reference yield method is fully transparent and contains no discretionary element
- Reference yield method kills all incentives to built in high-yield locations

Assessment criteria

- The presented methods have different advantages and disadvantages
- The choice of an suitable method for Ukraine has to consider:



Cost-efficiency: Is ensured if a measure is superior over alternative measures in respect of system costs



Effectiveness: Is ensured if a measure allows an achievement of specific targets



Simplicity: Is ensured if a regulations related to a measure are as simple as possible



Fairness: Is ensured if all affected investors are treated equally