RES is one of the world's leading independent developers , constructors and operators of renewable energy and energy storage.

Further to ACER's call for comments on the Network Code on Emergency and Restoration, here are RES' comments:

Article 2(6) definition of Energy Storage does not distinguish between devices which can (e.g. battery energy storage systems) and cannot (e.g. pumped-hydro storage systems) change from charging to discharging within timescales which may be useful for the Frequency Deviation management procedure (Article 13). This definition should be redrafted to facilitate the full utilisation of the capabilities of some energy storage devices to mitigate frequency incidents via Article 13.

Article 13(6) requires that *"Each TSO and DSO identified pursuant to Article 9(7) shall manually disconnect Energy Storage acting as load connected to its network before activation of the automatic Low Frequency Demand Disconnection scheme described in Article 14, provided the rate of change of Frequency allows it."* However, some energy storage systems can change from charging to discharging very quickly (in 10s of milliseconds in some cases) and could be manually instructed to discharge energy thus mitigating frequency incidents. This paragraph should be redrafted to take full advantage of the rapid rate of change of power from charging to discharging which some energy storage devices can achieve and which would assist frequency deviation management. Otherwise TSOs and DSOs will be required to disconnect energy storage devices which could instead help to mitigate frequency incidents.