

Proposals for amendments to the Requirements for Generators

Fields marked with * are mandatory.

Introduction

Important developments in the policies of decarbonisation of the European Union (EU) energy and transport sectors have taken place since the inception of the development of the first European Grid Connection Network Codes (GC NCs) in 2012.

In the framework of the Grid Connection European Stakeholder Committee (GC ESC), the European Commission proposed for ACER to initiate the process towards the amendment of the existing GC NCs in September 2022. The amendment process, as presented to the GC ESC is outlined in the Figure below:



Following the scoping phase, ACER published the Policy Paper on the revision of the network code on requirements for grid connection of generators and the network code on demand connection in September 2022. The Policy Paper aims to transparently indicate to stakeholders the key policy areas in which amendments are to be expected. Moreover, the Paper draws on the alternative policy options and provides recommendations and proposed actions for the amendment process.

[Access the ACER Policy Paper on the revision of the NC RfG and NC DC](#)

This consultation aims at gathering, from all interested stakeholders, concrete proposals for amendments to the Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a **Network Code on Requirements for Grid Connection of Generators** ('NC RfG').

For amendment proposals concerning Network Code on Demand Connection, please go to the form: [NC DC](#).

Responses to this consultation should be submitted by 28 November 2022 23:59 CET.

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* Name of the stakeholder:

CogenEurope

* Contact person:

[Redacted contact person information]

* Contact person's email address:

[Redacted email address]

* Country of the stakeholder's headquarters or main country of operation:

Belgium

* Type of the stakeholder:

- ☒ Generator (including association)
- ☐ Consumer (including association)
- ☐ Transmission system operator (including association)
- ☐ Distribution system operator (including association)
- ☐ Manufacturers (including association)
- ☐ Academia/research institution
- ☐ Regulatory authority

☐ Other (please, elaborate)

Please, elaborate on your answer above, if necessary:

COGEN Europe represents the manufacturers and operators of cogeneration solutions. Cogeneration is the suite of technologies that simultaneously produce heat and power, which improves primary energy efficiency compared to the separate production of heat and power. Cogeneration today delivers 12% of electricity and 16.5% of heat in Europe, across industry, district heating and households. The EU has made “energy efficiency first” principle a priority for delivering our climate and energy ambitions. In this context, all EU and national legislation must promote the highest efficiency generators and remove barriers to their deployment. The requirements for connecting such cogeneration plants to the grid could have a direct impact on the operational efficiency and that can affect the viability of such generating plants. Harmonisation between member states on grid connection requirements is very important to facilitate an efficient and competitive market for PGMs. The RfG is a first step for such harmonisation, but it still have major shortcomings.

* Do you consent to the publication of the stakeholder's name?

- ☒ Yes
☐ No

* Do you consent to the publication of provided answers?

- ☒ Yes
☐ No (please, note that your answer, without your name and organization, may be shared with the EU institutions and national authorities, drafting team members, and other persons or entities involved in the European Grid Connection Network Codes amendment process)

Instructions

Stakeholders are invited to submit their amendment proposals to the RfG articles that they consider should be revised in a two-step process:

1. by inserting the proposed amendments in the provided Word file
2. by motivating/reasoning the proposed amendments through this online consultation form.

Both steps are mandatory for all amendment proposals.

(Where no amendment is proposed, the article text in the word file can be left unaltered and the cells in the consultation form can be left blank.)

The mandatory steps for submitting amendment proposals are detailed below. At the end of this section, you can find an example showing how to submit your proposals.

Step 1

Please include all your amendment proposals in the **Word file provided below using the Track Changes mode**. Once you edit the file and rename it with your stakeholder's name ("NC_RfG_stakeholder_name"), please upload it in the last section of this form (FILE UPLOAD)

Step 2

In addition, please use this form to motivate/reason your proposals, following the instructions:

General requirements for type B power-generating modules

Please write your amendment proposal and the reasoning in the table below.


	Amendment proposal	Reasoning	Relation to other provisions
Article 14(1)	1	2	3
Article 14(2)			
Article 14(3)			
Article 14(4)			
Article 14(5)			

Please write your amendment proposal and the reasoning in the table below.

4

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

Please upload your file if necessary

 The maximum file size is 1 MB

5

Select file to upload

1. Propose an amended wording of the relevant provision, as you provided in the Word file.
 2. Provide the motivation/reasoning behind your proposal.
 3. Indicate (if any) which other provisions of the NC RfG are impacted and may need to be amended following your proposal.
 4. Provide (if any) your proposals for adding new provisions to the relevant section of the Regulation, as you provided in the Word file.
 5. Upload figures or tables if necessary; text inputs should be provided directly in the consultation form.
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Example

Stakeholder XYZ would like to propose an amendment to Article 27 of NC RfG. In their view, the meaning of the word "respectively" in this article is not clear. Following a two-step process, the stakeholder downloads the Word file from the **Instruction** section, turns on the Track Changes mode and edits the text (first step).



Article 27

System restoration requirements applicable to AC-connected offshore power park modules

The system restoration requirements laid down respectively in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

Article 28

General system management requirements applicable to AC-connected offshore power park modules

The general system management requirements laid down in Article 14(5), Article 15(6) and Article 16(4) shall apply to AC-connected offshore power park modules.

After saving the edited file on their device under the name "*NC_RfG_Stakeholder_XYZ*", the stakeholder uploads it in the **FILE UPLOAD** section.

Pages

Introduction	Instruction	Whereas	Definitions	TITLE I	TITLE II CH. 1	TITLE II
TITLE III	TITLE IV	TITLE V	TITLE VI	TITLE VII	Other	FILE UPLOAD

FILE UPLOAD

Please upload the Word file (downloaded from the *Instruction* section) containing all your amendments

The maximum file size is 1 MB

NC_RfG_Stakeholder_XYZ.docx

Select file to upload

Previous

Submit

The stakeholder proceeds to motivate/reason their proposal. As they would like to propose an amendment to Article 27 of NC RfG, they enter **TITLE II CHAPTER 4** Section and insert the proposed amended wording and the reasoning (second step). As the proposed amendment of Article 27 does not affect other provisions, they leave the last column blank.

Pages

[Introduction](#)[Instruction](#)[Whereas](#)[Definitions](#)[TITLE I](#)[TITLE II CH. 1](#)[TITLE II CH. 2](#)[TITLE II CH. 3](#)[TITLE II CH. 4](#)[TITLE III](#)[TITLE IV](#)[TITLE V](#)[TITLE VI](#)[TITLE VII](#)[Other](#)[FILE UPLOAD](#)

TITLE II CHAPTER 4 - Requirements for offshore power park modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 23	//	//	//
Article 24	//	//	//
Article 25	//	//	//
Article 26	//	//	//
Article 27	The system restoration requirements laid down in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.	The current wording of Article 27 refers to the provisions of Articles 14(4) and 15(5). However, it is unclear from the legal text how the respective application should be understood. Indicating that the requirements of Article 14(4) shall apply to offshore PPMs type B and requirements of Article 15(5) shall apply to offshore PPMs type C follows the internal logic of the NC RfG and corresponds with the capabilities of the units in question.	- //
Article 28	//	//	//

As the survey is long,

1. you have the possibility to edit your answer after submission. When clicking on "submit", you will be given a contribution ID, which you can then use to access your contribution here. This allows you to proceed in steps.
2. we kindly suggest that you download the entire survey as .pdf (link on the right), prepare your answers and then upload them at once in the EU Survey Tool, to avoid a session timeout on submission.

The maximum length of each cell is 5000 characters. This is the maximum technical limit set by the EUsurvey tool, which cannot be increased.

Whereas Section

Please write your amendment proposal and the reasoning in the table below.

Numbers in the first column correspond with the recitals of the NC RfG Whereas section

	Amendment proposal	Reasoning	Relation to other provisions
(1)			
(2)			
(3)			
(4)			
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(23)			
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(25)			

(26)			
(27)	<p>The regulatory authorities, Member States and system operators should ensure that, in the process of developing and approving the requirements for network connection, they are harmonised to the extent possible, in order to ensure full market integration. Established technical standards should be taken into particular consideration in the development of connection requirements. Development of requirements shall be carried involving European standardisation organisations therefore permitting the evolution of product standards and, as a consequence, the adoption of the same by industry.</p>	<p>CogenEurope supports the use of product and connection recognized international standards to help industry in providing reliable generating unit and fostering product harmonization.</p> <p>CogenEurope supports adding a wording to the prologue in line with the outcome of EUTurbine webconf.</p>	
(28)			
(29)			
(30)			
(31)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new recitals	Reasoning	Relation to other provisions
New recitals	<p>(3) The requirements on electricity storage are considered to be the same as those on power generation modules unless explicitly stated otherwise in this Regulation. In the case of electrical equipment such as synchronous compensators, flywheels and regenerative braking systems which do not fall onto the definition of a power generating module or electricity storage module, it is down to the relevant TSO to define the technical requirements that apply*.</p> <p>(4) For the purpose of this regulation, electricity storage is defined as “the conversion of electrical energy into a form of energy which can be stored, the storing of that energy, and the subsequent reconversion of that energy back into electrical energy”. For the avoidance of doubt this definition includes electric vehicles*.</p> <p>(34) An electricity storage module connected to a network by a synchronous generator has to</p>		

	<p>meet the same requirements as a synchronous power generating module and an electricity storage module connected to a network by a non- synchronous generator or through power electronics has to meet the same requirements as a power park module (which could include electric vehicles), with the specificities as described in the following relevant articles. For electricity storage modules that are installed with other generating unit (synchronous or non-synchronous) and that are not operating independently RfG requirements do not directly apply. In such a case the generating module and the storage module are considered as a single generating module and RfG requirements applicable to the power generating are the ones that apply. The capacity of the generating module corresponds to the maximum capacity at which the equivalent single generating module is expected to operate.</p>	<p>CogenEurope consider that Energy Storage module shall be integrated in the next RfG 2.0.</p> <p>It is recommended to adopt definition not limiting to “battery” storage, but inclusive of any technology for example also extended to the use of H2 or similar biofuels.</p> <p>Storage module used not as a standalone equipment shall not be subject to overall RfG requirements (as result of the discussion in EG Storage [previously discussion in EG MCS]).</p> <p>Recitals (3), (4) and (34) are added with their expected number. Since there are 31 articles, the last article becomes the (34). In the word document the numbering shall be revised.</p>	
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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 2(1)			
Article 2(2)			
Article 2(3)			
Article 2(4)			
Article 2(5)	(5) power-generating module' means either a synchronous power-generating module or a power park module. A power generating module includes an electricity storage module.	CogenEurope consider that Energy Storage module shall be integrated in the next RfG 2.0. See comments made to Title	
Article 2(6)			
Article 2(7)			
Article 2(8)			
Article 2(9)			
Article 2(10)			
Article 2(11)			
Article 2(12)			
Article 2(13)			
Article 2(14)			
Article 2(15)			
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Article 2(60)			
Article 2(61)			
Article 2(62)			
Article 2(63)			
Article 2(64)			
Article 2(65)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new definitions	Reasoning	Relation to other provisions
New definitions	<p>Definition of families of power generating unit, power generating module and power generating plant</p> <p>We recommend the use of family definition as deliverable of the EG HCF (ongoing) to be used as reference starting point</p> <p>We recommend to include also the definition of variants (or similar wording) that address a generating unit similar to an already tested one except for specific components potentially affecting quasi steady state and or dynamic behaviour still part of EG HCF deliverables.</p> <p>(66) 'electricity storage' means the conversion of electrical energy into a form of energy which can be stored, the storing of that energy, and the subsequent reconversion of that energy back into electrical energy.</p> <p>(67) 'electricity storage module' is a power generating module which can inject and consume active power to and from the network.</p>	<p>Art 2 Definitions Family and variants</p> <p>CogenEurope considers that Family Definition can help the compliance process in many ways CogenEurope recommends to use the recommendation from EG HCF as starting point.</p> <p>Art 2 Definitions (66), (67) and (68) CogenEurope consider that Energy Storage module shall be integrated in the next RfG 2.0. See comments made to Title</p>	

	(68) 'maximum consumption capacity' means the maximum continuous active power which an electricity storage module can import from the network,		
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TITLE I - General provisions

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 1	<p>This Regulation establishes a network code which lays down the requirements for grid connection of power-generating facilities (which includes electricity storage which can inject and consume electrical energy to and from the network), namely synchronous power-generating modules, power park modules and offshore power park modules, to the interconnected system. It, therefore, helps to ensure fair conditions of competition in the internal electricity market, to ensure system security and the integration of renewable electricity sources, and to facilitate Union-wide trade in electricity.</p>	<p>CogenEurope consider that Energy Storage module shall be integrated in the next RfG 2.0.</p>	
Article 3	<p>To delete art 3.2 (d) storage devices except for pump-storage power-generating modules in accordance with Article 6(2). This sentence shall be deleted!!</p>	<p>Editorial modification associated to the introduction of Electricity storage module.</p>	
	<p>1. Existing power-generating modules are not subject to the requirements of this Regulation, except where:</p>		

(a) a type C or type D power-generating module has been modified such an extent that its electrical and grid-dynamic interaction have materially altered. In these cases and prior to carry out a modification:

i. power-generating facility owners who intend to undertake the modernisation of a plant or replacement of equipment affecting the electrical characteristics of the power-generating module shall notify their plans to the relevant system operator in advance;

ii. if the relevant system operator considers that the extent of the modernisation or replacement of equipment is material, in respect of any of the criteria in paragraph 1.c below, the system operator shall notify the relevant regulatory authority or, where applicable, the Member State; and

iii. the relevant regulatory authority or, where applicable, the Member State shall decide which requirements of this Regulation shall apply and if the existing connection agreement needs to be revised or replaced; or

(b) a regulatory authority or,

where applicable, a Member State decides to make an existing power-generating module subject to all or some of the requirements of this Regulation, following a proposal from the relevant TSO in accordance with paragraphs 3, 4 and 5. However in such a case a remunerated approach shall be put in place by the regulatory authority ensuring the certainties of the investment to the plant owner. The request shall follow a feasibility study and shall be based on a CBA;

(c) For the purposes of this article a material alteration will be defined according to these parameters:

i. A percentage increase above the existing maximum capacity (Pmax) of the PGM to be defined by the relevant system operator except in case the increase happens when adding a new separate generating unit to the existing installation, in such a case the requirements of the present regulation apply to the new equipment(s), while applicability of the new requirement to the existing unit shall be derogated or subject to CBA and feasibility evaluation.

ii. A relevant percentage

An harmonized approach to criteria for significant modernization is considered very useful.

The text proposal comes from the EG CSM.

It is considered that an alignment of existing generating unit or plant to new requirements shall follow a remunerated approach and feasibility shall be eventually based on CBA.

With respect to the paragraph

Article 4

deviation from the existing required reactive capability of the PGM to be defined by the relevant system operator in coordination with the relevant TSO; or

iv.iii. A change in frequency stability and active power management capabilities to be defined by the relevant TSO.

2. For the purposes of this Regulation, a power-generating module shall be considered existing if:

- (a) it is already connected to the network on the date of entry into force of this Regulation; or
- (b) the power-generating facility owner has concluded a final and binding contract for the purchase of the.....

.....

8. Where component parts or units of an existing power generating module are replaced or new parts or units added to an existing power generating module, those new or replacement parts or units should, to the extent applicable:

- (a) Be compliant with the requirements of this Regulation, unless this implies relevant modification to the other

stating that imposing the application of requirements of the RfG to existing unit can be unilaterally decided,

CogeneEurope considers that this decision shall be in any case subject to CBA and remunerated approach.

In case of installation of a new generating unit in a plant where other generating unit are installed shall not trigger unnecessary costs to upgrade existing units. Upgrade of the existing units shall be based on CBA and feasibility study.

Parts replacement will not trigger new requirements in case the replacement is aimed at improving efficiency, reducing emissions (overall plant emissions as well), permitting process optimization. Forced alignment to new requirements shall not be a limitation to the priority target of decarbonization and safety. In addition emission requirements and efficiency target are continuously evolving and plant facilities are continuously upgrading. Alignment to new requirement would add an unnecessary burden considering

components of the generating unit or generating module to allocate the new requirements;

(b) Not be a limitation on the eventual compliance of the power generating module should compliance be required with this Regulation in accordance with this article; and

(c) Immediately contribute the requirements of this Regulation pro rata compared to the power generating module as appropriate (e.g. reactive power, frequency response etc). to the future compliance of that power generating module for the possibility that compliance with this Regulation is required in the future. Paragraph 8 does not apply to maintenance activities or to recognized spare parts, whether or not those parts are purchased new at the time of their incorporation in the power generating module.

Paragraph 8 does not apply when upgrading a generating unit to improve efficiency, to reduce emissions, to optimize controllability coupled with other plant facility components or units, unless applicability of new requirements come at no cost.

cost associated to modification and re-certification for units that are not expected to change their own behaviour.

Art 4.2 General Comments

General comments associated to timeline consistency to be considered in the RfG code.

Since a different text will be proposed, we recommend timeline crosscheck for consistency by legal department.

art 4.2 General comments

In article 4.2 are defined timelines for introduction of new requirements from when a generating is considered new and therefore new requirements are applicable.

It has been recognized that the present timeline in the RfG code can create problem and uncertainties, in fact Transmission System Operator shall define “draft” values for non-exhaustive requirements after two years from the publication of the regulation, but at the same time there is an obligation for plant generating unit to comply with such requirements at the moment of the publication of the draft requirements.

Timeline needs to be consistent with reality and foresee appropriate time for the industry to familiarize with the published requirements.

This article does not describe implementation process at national level when introducing new or amendment to existing requirements. Including minimum grace period to ensure a smooth introduction of the requirements.

We recommend to introduce a min

	<p>of 1 year transition time to permits the industry to cope with new requirements. The time reference shall referred to the date of contract signature (rather than 1st synchronization).</p>		
	<p>1. The power generating modules shall comply with the requirements on the basis of the voltage level of their connection point and their maximum capacity according to the categories set out in paragraph 2.</p> <p>2. Power generating modules within the following categories shall be considered as significant:</p> <p>(a) maximum capacity of 0.8 kW or more (type A);</p> <p>(b) where the capacity of the power generating module is less than the threshold at which the connection voltage at its connection point will also be considered, as specified in accordance with the procedure set out in paragraph 4:</p> <p>(i) maximum capacity at or above a threshold proposed by each relevant TSO in accordance with the procedure laid out in</p>		

paragraph 3 (type B). This threshold shall not be above the limits for type B power generating modules contained in Table 1;

(ii) maximum capacity at or above a threshold specified by each relevant TSO in accordance with paragraph 3 (type C). This threshold shall not be above the limits for type C power generating modules contained in Table 1; or

(iii) maximum capacity or above a threshold specified in accordance with paragraph 3 (type D). This threshold shall not be above the limit for type D power generating modules contained in Table 1.

(c) where the capacity of the power generating module is greater than or equal to the threshold at which the connection voltage at its connection point will also be considered, as specified in accordance with the procedure set out in paragraph 4:

(i) connection point below 110 kV and maximum capacity at or above a threshold proposed by each relevant TSO in accordance with the procedure laid out in paragraph 3 (type B). This threshold shall not be above the limits for type B power generating

Article 5

modules contained in Table 1;
(ii) connection point below 110 kV and maximum capacity at or above a threshold specified by each relevant TSO in accordance with paragraph 3 (type C).

This threshold shall not be above the limits for type C power generating modules contained in Table 1; or

(iii) connection point at 110 kV or above (type D). A power generating module is also of type D if its connection point is below 110 kV and its maximum capacity is at or above a threshold specified in accordance with paragraph 3. This threshold shall not be above the limit for type D power generating modules contained in Table 1.

[TO INSERT: TABLE 1]

3. Proposals for maximum capacity thresholds for types B, C and D power generating modules shall be subject to approval by the relevant regulatory authority or, where applicable, the Member State. In forming proposals the relevant TSO shall coordinate with adjacent TSOs and DSOs and shall conduct a public consultation in accordance with Article 10. A proposal by the relevant TSO to

Small units connected to HV system or installed in big power plants shall be subject to requirements based on their size.

In case plant facility includes generation, but it will not export power to the grid, then DCC code is applicable.

In case a plant facility includes generation and will export to the grid a very limited amount of power in any condition compared to the real size of the unit, then the reference power defining the requirements can be different from the type classification and can be subject to agreement between the plant facility owner and the relevant system operator.

In the EG BftA final report there is recommendation for establishing a lower limit of the Type A/B threshold to 50 kW. Threshold limits could be for sure improved, but it would be difficult to propose a complete text revision of the article. CogenEurope would be contribute to such activities if this is set to happen.

change the thresholds shall not be made sooner than three years after the previous proposal.

4. The capacity threshold from which the connection voltage of a power generating module will also be included in the determination of significance as set out in paragraph 2 will be set initially at 10MW. Where the relevant TSO wishes to amend this threshold, such a proposal may be made:

- (i) To decrease the threshold from 10MW down to a value greater than or equal to the higher of either 5MW or the capacity threshold at which a power generating module is of type C as set in paragraph 3; or
- (ii) To increase the threshold from 10MW up to the capacity threshold at which a power generating module is of type D as set in paragraph 3

Such a proposal shall be subject to approval by the relevant regulatory authority or, where applicable, the Member State. In forming proposals the relevant TSO shall coordinate with adjacent TSOs and DSOs and shall conduct a public consultation in accordance with Article 10. A proposal by the relevant TSO to change the

thresholds shall not be made sooner than three years after the previous proposal.

The requirements described in EU 2016/1388 will be applicable to power generating module which will not export power to the grid under any condition; requirements described in the present regulation do not apply to such Power Generating Module. Power Generating Module that are expected to export power to the grid below the threshold applicable for Type A or in general to have limited power exported to the electrical system (below 30% of the installed power) the reference power to be used for defining the requirements can be defined differently from the original classification and can be subject to agreement between the plant facility owner and the relevant system operator.

Article 6	<p>art 6.4. Except for requirements under paragraphs 2 and 4 of Article 13 or where otherwise explicitly stated in the national framework by referring to power-generating modules of facilities for combined heat and power production embedded in the networks of industrial sites, requirements of this Regulation relating to the capability to maintain constant active power output or to modulate active power output shall not apply to power-generating modules of facilities for combined heat and power production embedded in the networks of industrial sites, where all of the following criteria are met:</p>	<p>art 6.4</p> <p>It has been several time discussed during GC ESC meeting that the original wording can be misunderstood and it is not legally clear. Art 6.3 is considered a non-exhaustive requirements. The intention was to permits exception to the content of the article by explicitly stating it during the national implementation phase. However in many cases implementation neglected the point, but as well in the same implementation it was stated that ALL generating unit shall respect the requirements. The new wording intends to clarify that unless CHP are explicitly indicated, the article shall apply. It is recommended that text goes through a legal assessment and for sure can be improved.</p>	
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Article 7	<p>..</p> <p>(f) take into consideration agreed European standards and technical specifications. TSOs or ENTSOE shall inform national and European technical committees respectively on applicable new requirements in due time.</p>	<p>CogenEurope supports the use of product and connection recognized international standards to help industry in providing reliable generating unit and fostering product harmonization.</p> <p>CogenEurope supports adding a wording to the prologue in line with the outcome of EUTurbine webconf.</p>	
Article 8			
Article 9			
Article 10			
Article 11			
Article 12			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
	<p>art 3.3 The documents defining the requirements and the verification of the compliance as defined by each Member State and system operators shall be available also in english. Unless the english is the official language of the Member State, the english version in case of a translation of the original document shall bear the words "Translation of the original document".</p> <p>Art 6.6. An electricity storage module shall be capable of satisfying the requirements of this Regulation irrespective of whether the electricity storage module injects and consumes active power to and from the network.</p> <p>Art 13.2(h) (h) An electricity storage module which is absorbing active power during an overfrequency event shall increase the level of active power absorbed according to the LFSM-O characteristic which shall</p>	<p>art 3.3 English Language CogenEurope recommends to adopt the wording proposed during EUturbine workshop in 2021, deliverables are part of GC ESC documentation.</p> <p>A non-binding translation of the national legislation into a common language (e.g. English) is necessary to improve share of information. It would facilitate compliance as it gives any EU</p>	

New articles	<p>be considered in terms of the power variation rather than the absolute value. The electricity storage module will absorb power up to filling the maximum energy that it is able to store depending on the specific operative condition, then it will cease consumption. The TSO can define a different characteristic or establish that the electricity storage module when absorbing active power will maintain the absorption level even during the over frequency event. For specific technology a specific absorption characteristic may be used in agreement with System Operator and based on technical or other constrains.</p> <p>Figure 1</p> <p>Pref is the reference active power to which ΔP is related and may be specified differently for synchronous power- generating modules and power park modules. ΔP is the change in active power output from the power-generating module. f_n is the nominal frequency (50 Hz) in the network and Δf is the frequency deviation in the network. At overfrequencies where Δf is above Δf_1, the power-generating module has to provide a negative active power output</p>	<p>stakeholder the possibility to access and understand all relevant national requirements.</p> <p>Art 6.6</p> <p>See above above comments related to electricity storage module.</p> <p>Art 13.2(h)</p> <p>See above above comments related to electricity storage module.</p> <p>It has to be noted that the consumption characteristic can be agreed with system operator depending on the technology involved.</p> <p>The requirement shall be reasonably “inclusive” since electrical storage are in evolution and are expected to play a more and more important role in the electrical system.</p>	Art 40 and followings associated to compliance
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	<p>change according to the droop S2. In the case of electricity storage modules, Pref could be the maximum capacity or the maximum consumption capacity at the moment the LFSM-O threshold is reached or the maximum capacity or maximum consumption capacity as agreed with the relevant system operator.</p>	
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TITLE II CHAPTER 1 - General Requirements

General requirements for type A power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 13(1)			
Article 13(2)			
Article 13(3)			
Article 13(4)			
Article 13(5)			

Article 13(6)	<p>The power-generating module shall be equipped with a logic interface (input port) in order to cease active power output or active power input within five seconds following an instruction being received at the input port. If a power generating module has a minimum active power, the generating unit is expected to achieve its minimum active power or to separate from the grid. In case a specific technology has technical limitation not permitting to reduce the power in such a short time, the plant facility owner and the relevant system operator shall agree on specific time interval to reduce power or it shall permit to disconnect the unit. As an alternative to remote control the integration of dispatchable units which react on measured grid parameters can be considered. The relevant system operator shall have the right to specify requirements for equipment to make this facility operable remotely. Each electricity storage module shall also be equipped with an input port to cease active power import upon instruction of the relevant system operator.</p>	<p>See above above comments related to energy storage module. In addition the wording “cease fire” is not common for Synchronous PGM. Such technology do not drop power down to 0 kW which is more a feature of inverter based technology. Generating unit with inertia dropping power so fast will backpower and some technology can have limitation in dropping power so fast. Therefore some additional wording has been added unless this is considered a requirements applicable only to PPMs.</p>	
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Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
	<p>Art 13(2)(h)</p> <p>(h) An electricity storage module which is absorbing active power during an overfrequency event shall increase the level of active power absorbed according to the LFSM-O characteristic which shall be considered in terms of the power variation rather than the absolute value. The electricity storage module will absorb power up to filling the maximum energy that it is able to store depending on the specific operative condition, then it will cease consumption. The TSO can define a different characteristic or establish that the electricity storage module when absorbing active power will maintain the absorption level even during the over frequency event. For specific technology a specific absorption characteristic may be used in agreement with System Operator and based on technical or other constrains.</p> <p>Figure 1</p> <p>Pref is the reference active power to which ΔP is related and may be specified differently for synchronous power- generating modules and</p>		

New provisions

power park modules. ΔP is the change in active power output from the power-generating module. f_n is the nominal frequency (50 Hz) in the network and Δf is the frequency deviation in the network. At overfrequencies where Δf is above Δf_1 , the power-generating module has to provide a negative active power output change according to the droop S2. In the case of electricity storage modules, P_{ref} could be the maximum capacity or the maximum consumption capacity at the moment the LFSM-O threshold is reached or the maximum capacity or maximum consumption capacity as agreed with the relevant system operator.

Art 13(8)

With regard to fault-ride-through capability of power-generating modules, this capability is requested to Type A PPMs.

Type A Combined Heat and Power Plant, Stirling engines technology, Hydraulic Power Plant and Fuel Cells technology [are] excluded from the requirements.

The system operator can define an active power threshold above which the requirements are applicable based on feasibility feedbacks from manufacturer, but in any case not

Art 13(2)(h)

See above above comments related to electricity storage module.

It has to be noted that the consumption characteristic can be agreed with system operator depending on the technology involved.

The requirement shall be reasonably “inclusive” since electrical storage are in evolution and are expected to play a more and more important role in the electrical system.

Art 13(8)

Regarding the introduction of FRT applicability to Type generating module, Cogeneurope supports solution 2 of recommendation in the final report EG BftA.

As discussed within the EG, exception shall be considered for micro CHP, micro Hydro units, sterling motor and fuel cells as well SPGM. The reasoning is extensively explained in the EG BftA to which CogenEurope contributed.

art 13(9)

See previous comment related to energy storage module.

	<p>below 50 kW.</p> <p>Fault Ride Through capability are not requested by Type A SPGM.</p> <p>Art 13(9)</p> <p>With regard to the limited frequency sensitive mode — underfrequency (LFSM-U) an electricity storage module operating in a consumption mode, the requirements of Annex I of this regulation apply.</p>		
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General requirements for type B power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 14(1)			
Article 14(2)	. In the case of an electricity storage module consuming active power, the electricity storage module shall be capable of modulating the import of active power following an instruction at the input port; if the electricity storage has technical limitation that impedes such controllability, the consumption characteristic shall be agreed with the system operator. The system operator shall take in consideration technical limitation in considering requirements for electrical storage controllability;	See previous comment related to electricity storage module. An additional wording has been introduced to tackle specific behaviours associated to storage technology.	
Article 14(3)			
Article 14(4)			
Article 14(5)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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General requirements for type C power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 15(1)			
	<p>Art 15(2)(vi)</p> <p>For an electricity storage module, these requirements shall apply when the electricity storage module is in an injecting mode of operation. Where the electricity storage module is in an importing mode of operation the requirements of Annex I shall apply.</p> <p>Figure 4 - Active power frequency response capability of power-generating modules in LFSM-U</p> <p>Pref is the reference active power to which ΔP is related and may be specified differently for synchronous power- generating modules and power park modules. ΔP is the change in active power output from the power- generating module. f_n is the nominal frequency (50 Hz) in the network and Δf is the frequency deviation in the network. At underfrequencies where Δf is below Δf_1 the power-generating module has to provide a positive active power output change according to the droop S2</p>		

In the case of electricity storage modules, Pref could be the maximum capacity or the maximum consumption capacity at the moment the LFSM-U threshold is reached or the maximum capacity or maximum consumption capacity as agreed with the relevant system operator.

Art 15(2)(d)(i)

(i) the power-generating module shall be capable of providing active power frequency response in accordance with the parameters specified by each relevant TSO within the ranges shown in Table 4. In specifying those parameters, the relevant TSO shall take account of the following facts:

- in case of overfrequency, the active power frequency response is limited by the minimum regulating level. For electricity storage modules, the active power frequency response may be limited by the minimum regulating level or maximum consumption capacity, or the maximum energy content that the electricity storage module can store in its operative condition or as agreed between the power

generating facility and the TSO.

— in case of underfrequency, the active power frequency response is limited by maximum capacity, and, in case of electricity storage modules, also by the maximum consumption capacity or maximum energy content of the electricity storage module in its operative condition (as declared by manufacturer) or as agreed between the power generating facility and the TSO.

— the actual delivery of active power frequency response depends on the operating and ambient conditions of the power-generating module when this response is triggered, in particular limitations on operation near maximum capacity at low frequencies according to paragraphs 4 and 5 of Article 13 and available primary energy sources;

— The TSO shall take into account the time needed for some technologies of electricity storage modules to switch from consumption mode to generating mode or vice versa and also the

Art 15(2)(c)(vi)

See previous comment related to energy storage module.

Art 15(2)(d)(i)

See previous comment related to energy storage module.

Article 15(2)	<p>fact that the droop primary frequency control characteristic in consumption and generating mode could be different.</p> <p>Art 15(2)(d) – Figure 5 - Active power frequency response capability of power-generating modules in FSM illustrating the case of zero deadband and insensitivity</p> <p>Pref is the reference active power to which ΔP is related. ΔP is the change in active power output from the power-generating module. f_n is the nominal frequency (50 Hz) in the network and Δf is the frequency deviation in the network.</p> <p>In the case of electricity storage modules, Pref could be the maximum capacity or the maximum consumption capacity at the moment the FSM threshold is reached or the maximum capacity or maximum consumption capacity as agreed with the relevant system operator.</p> <p>Art 15(2)(f) (f) with regard to disconnection due to underfrequency, power-generating facilities capable of</p>	<p>Art 15(2)(d) – Figure 5 See previous comment related to energy storage module.</p> <p>Art 15(2)(f) See previous comment related to energy storage module.</p> <p>Art.15.6.c CogenEurope considers important the use in the compliance process. However manufacturer intellectual property must be considered properly in the process. This point shall be clearly stated in the regulation.</p> <p>On the comment that by having manufacturer supplying the model in their own software is not acceptable, it would also not be acceptable having manufacturer dealing with a wide number of different softwares and even different revision and with the need of providing maintenance (and eventually revalidating models) in all formats along the lifecycle of the generating unit.</p> <p>Simulation software adopted by system operators are expected to be compatible as much as reasonable with open source</p>	
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acting as a load, including hydro pump-storage power-generating facilities and electricity storage modules, shall be capable of disconnecting their load in case of underfrequency. The requirement referred to in this point does not extend to auxiliary supply;

Art.15.6.c

General requirements for type C power-generating modules

...

c. with regard to the simulation models:

(i) at the request of the relevant system operator or the relevant TSO, the power-generating facility owner shall provide simulation models which properly reflect the behaviour of the power-generating module for the relevant study purpose in both steady-state, and dynamic simulations (root mean square), or in electromagnetic transient simulations. Manufacturer proprietary information shall be protected and any means shall be put in place to avoid proprietary information to be shared without consent. These means may

models are at least among main common used softwares. It is expected as well that software revision are as much as reasonable compatible with older revision. Otherwise library models shall be widely used, so that it becomes more a parametrization issue. The approach of using simulation software common libraries however could imply a lower accuracy of the model. This part has not been included in the present amendment proposal, but it is considered there is a need for a minimum common specification for simulation software to be used for simulation studies.

include but are not limited to model encryption, non-disclosure agreement as defined by the information provider, use of parameters associated to library models part of correspondent simulation software, encrypted model in open source software, etc.

The power-generating facility owner shall ensure that the models provided have been verified against the results of compliance tests referred to in Chapters 2, 3 and 4 of Title IV, and shall notify the results of the verification to the relevant system operator or relevant TSO. Member States may require that such verification be carried out by an authorised certifier;

(ii) the Synchronous PGM simulation models provided by the power- generating facility owner shall contain the following sub-models, depending on the existence of the individual components:

- alternator and prime mover,
- speed and power control,
- voltage control, including, if applicable, power system stabiliser ('PSS') function and excitation control system,

- power-generating module protection models, as agreed between the relevant system operator and the power-generating facility owner,
- (v) the request by the relevant system operator referred to in point (i) and
- (ii) shall be coordinated with the relevant TSO. It shall include:
 - the format in which models are to be provided,
 - the provision of documentation on a model's structure and block diagrams,
 - an estimate of the minimum and maximum short circuit capacity at the connection point, expressed in MVA, as an equivalent of the network;
- ...
- i. In the case that encrypted detailed EMT models are accepted by the relevant system operator or the relevant TSO, the relevant system operator or the relevant TSO shall have the right to specify the model encryption interfaces (for example the model structure and the signal interfaces to be observable in the network studies); the interfaces shall be reasonable, feasible and aligned to the

	technology to which the model is referred to.		
Article 15(3)			
Article 15(4)			
Article 15(5)			
Article 15(6)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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General requirements for type D power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 16(1)			
Article 16(2)			
Article 16(3)			
Article 16(4)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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TITLE II CHAPTER 2 - Requirements for synchronous power-generating modules

Requirements for type B synchronous power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 17(1)			
Article 17(2)			
Article 17(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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Requirements for type C synchronous power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 18(1)			
Article 18(2)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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Requirements for type D synchronous power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 19(1)			
Article 19(2)			
Article 19(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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TITLE II CHAPTER 3 - Requirements for power park modules

Requirements for type B power park modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 20(1)			
Article 20(2)			
Article 20(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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Requirements for type C power park modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 21(1)			
Article 21(2)			
Article 21(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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Requirements for type D power park modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 22			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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TITLE II CHAPTER 4 - Requirements for offshore power park modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 23			
Article 24			
Article 25			
Article 26			
Article 27			
Article 28			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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TITLE III - Operational notification procedure for connection

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 29			
Article 30			
Article 31			
Article 32			
Article 33			
Article 34			
Article 35			
Article 36			
Article 37			
Article 38			
Article 39			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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TITLE IV - Compliance

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 40			
Article 41			
Article 42			
Article 43			
Article 44			
Article 45			
Article 46			
Article 47			
Article 48	<p>(a) the power park module's technical capability to continuously modulate active power over the full operating range between maximum capacity and minimum regulating level to contribute to frequency control shall be demonstrated. The steady-state parameters of regulations, such as insensitivity, droop, deadband and range of regulation, as well as dynamic parameters, including frequency step change response shall be verified. In the case of an electricity storage module, the full operating range is between maximum consumption capacity and maximum capacity, limited eventually by operative condition</p>	<p>See previous comment related to energy storage module.</p> <p>Note that operative condition can have a limitation on the electrical storage module capability</p>	
Article 49			

Article 50			
Article 51			
	<p>Compliance simulations for type C synchronous power- generating modules</p> <p>1. In addition to the compliance simulations for type B synchronous power- generating modules set out in Article 51, type C synchronous power-generating modules shall be subject to the compliance simulations detailed in paragraphs 2 to 5. Instead of all or part of those simulations, the power-generating facility owner may use equipment certificates issued by an authorised certifier, which must be provided to the relevant system operator.</p> <p>2. With regard to the LFSM-U response simulation the following requirements shall apply:</p> <p>(a) the power-generating module's capability to modulate active power at low frequencies in accordance with point (c) of Article 15(2) shall be demonstrated by RMS simulation;</p> <p>(b) the simulation shall be carried out by means of low frequency steps and ramps</p>		

reaching maximum capacity,
taking into account the droop
settings and the deadband;

(c) the simulation shall be
deemed successful in the event
that:

(i) the simulation model of the
power-generating module is
validated against the compliance
test for LFSM-U response
described in of Article 45(2); and

(ii) compliance with the
requirement of point (c) of Article
15(2) is demonstrated.

3. With regard to the FSM response
simulation the following
requirements shall apply:

(a) the power-generating
module's capability to modulate
active power over the full
frequency range in accordance
with point (d) of Article 15(2) shall
be demonstrated by RMS
simulation;

(b) the simulation shall be
carried out by simulating frequency
steps and ramps big enough to
trigger the whole active power
frequency response range, taking
into account the droop settings and
the deadband;

(c) the simulation shall be
deemed successful in the event

that:

- (i) the simulation model of the power-generating module is validated against the compliance test for FSM response described in Article 45(3); and
- (ii) compliance with the requirement of point (d) of Article 15(2) is demonstrated.

4. With regard to the island operation simulation the following requirements shall apply:

- (a) the power-generating module's performance during island operation referred to in the conditions set out in point (b) of Article 15(5) shall be demonstrated by RMS simulation;
- (b) the simulation shall be deemed successful if the power-generating module reduces or increases the active power output from its previous operating point to any new operating point within the P-Q-capability diagram within the limits of point (b) of Article 15(5), without disconnection of the power-generating module from the island due to over- or underfrequency.

5. With regard to the reactive power capability simulation the following requirements shall apply:

Simulation can help in the compliance process.

Reactive power capability can be demonstrated by documental evidence based on manufacturer information (rather than simulation) that shows capabilities at different voltage level. Simulation do not provided added value in such respect, real tests, depending on the Type C definition thresholds cannot necessarily be conducted: for big units real tests imply relevant reactive power deviations that displace the voltage consistently. To perform such tests at the different voltages, TSO cooperation is mandatory (OLTC control). By experience this is not well understood and complex to be coordinated.

	<p>(a) the power-generating module's capability to provide leading and lagging reactive power capability in accordance with the conditions set out in points (b) and (c) of Article 18(2) shall be demonstrated by documental evidence based on manufacturer documentation at different voltage level. Simulation means in this case the representation of the power generating module capabilities considering reactive power capabilities of the Power Generating Unit and PPMs and other equipments or components that influence the reactive power (like transformers, consumptions, etc.);</p> <p>(b) the simulation shall be deemed successful if the following conditions are fulfilled:</p> <p>(i) the simulation model of the power-generating module is validated against the compliance tests for reactive power capability as far as these tests were accommodated (grid voltage deviations) and allowed by the RSO described in Article 45(7); and</p> <p>(ii) compliance with the requirements of points (b) and (c) of Article 18(2) is demonstrated.</p>		
Article 53			

Article 54			
Article 55			
Article 56			
Article 57			
Article 58			
	<p>Art 59(1)</p> <p>1. "ACER shall monitor the implementation of this Regulation in accordance with Article 32 of Regulation (EC) No 2019/943. ACER performing its task of monitoring shall involve the European Stakeholder Committee". Monitoring shall cover in particular the following matters:</p> <p>...</p> <p>Art 59(3)</p> <p>Relevant TSOs and DSOs shall submit and keep updated to ACER through the national regulatory authority, the information requested by ACER to perform the tasks referred to in paragraphs 1 and 2. Relevant TSOs shall submit to ENTSO for Electricity the information required to perform the tasks referred to in paragraphs 1 and 2.</p> <p>Based on a request of the regulatory authority, DSOs shall provide TSOs with information under paragraph 2 unless the</p>		

Article 59

information is already obtained by regulatory authorities, the Agency or ENTSO-E in relation to their respective implementation monitoring tasks, with the objective of avoiding duplication of information.

The ACER in cooperation with ENTSO for electricity shall set-up a public online tool where national relevant information is collected and accessible to all relevant parties and interested individuals. The information to be gathered are the following:

- Link to legal text
 - Definition of exhaustive and non-exhaustive parameters
 - TSOs requirements and compliance tests and process to be performed (this can consist of a link to the TSO website)
 - DSOs requirements and compliance tests and process to be performed (this can consist of a link to the EU DSO website)
 - National website
 - Contact mail and contact phone where requests can be posted.
 - Any information relevant that can be useful for any person that has an interest in the code.
- The online tool can be used by

ACER shall be explicitly empowered to force adherence of the national regulation to the European regulation with defined timelines. The wording shall be aimed to limit as much as reasonable divergence from the regulation.

	<p>TSOs and DSOs for eventual additional communication specific to their system. The information shall be organized to permit easy access and provide a complete usable information to relevant party including plant owners and manufacturers. Stakeholders shall be involved in developing the online focal point.</p> <p>TSOs and DSOs shall ensure the information provided is, up to date.</p> <p>TSOs and DSOs shall provide the requested information within three months, or in case of specific requests within a given realistic deadline, after receiving the request, that can be calendarized.</p>		
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Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
	<p>art 41(7)</p> <p>In the frame of compliance testing, when the system operator requires proof of compliance of specific requirements, it shall establish a procedures permitting generating units to be connected to the grid with the purpose of conducting such tests and verifications, including certification test process when requested.</p> <p>Art 42(2)(d)</p> <p>allow the use of alternative or same set of tests carried out in a different facility provided that those tests are efficient and suffice to demonstrate that a power-generating module complies with the requirements of this Regulation.</p> <p>Art 42(5)</p> <p>Instead of carrying out the relevant test, power-generating facility owners may rely upon component and or equipment certificates issued by an authorised certifier to demonstrate compliance with the relevant requirement. In such a case, copies of the equipment</p>	<p>Art 41(7)</p> <p>CogenEurope support recommendation that enable and simplify the compliance process for power generating module.</p>	

New articles	<p>certificates shall be provided to the relevant system operator.</p> <p>Art 43(6) The relevant system operator shall allow the use of compliance simulation as described in article 43.2 also for Type A and Type B generating module. The provision described in art 15.6(c) are in this case applicable also to Type A, and Type B when validated model is used</p> <p>Art 59(5) In case of divergence the national regulation shall be updated not later than 3 months after notification from ACER, unless a formal derogation process has been initiated.</p> <p>Art 59(6) Stakeholders may provide feedback on the implementation of this regulation and identification of any divergences to it, supporting ACER in conducting its activities as described in article 32 (1) of EU 2019/943. ACER shall keep the stakeholders informed on the follow up actions.</p> <p>Art 59(7)</p>	<p>Art 42(2)(d) CogenEurope support recommendation that enable and simplify the compliance process for power generating module.</p> <p>Art 42(5) CogenEurope support recommendation that enable and simplify the compliance process for power generating module</p> <p>Art 43(6) See previous comment related to energy storage module.</p> <p>Note that operative condition can have a limitation on the electrical storage module capability</p> <p>Art 59(5) ACER shall be explicitly empowered to force adherence of the national regulation to the European regulation with defined timelines. The wording shall be aimed to limit as much as reasonable divergence from the regulation.</p> <p>Art 59(6) CogenEurope supports to formalize that stakeholder can provide feedback to ACER.</p>	
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	<p>Based on the experience gathered in the implementation and application of this regulation, ACER and ENTSO for Electricity, may propose amendments to the present requirements with focus on reliable and effective operation and to prevent or limit incidents on the system considering an efficient, harmonized and cost containing implementation of the regulation, also taking into account the needs of all stakeholders in the value chain involved.</p> <p>Experience gathered in the implementation and application of this regulation shall be shared within the regional coordination centres as part of their task as defined in EU 2019/943 and with the mandatory participation of involved stakeholders at least once a year.</p> <p>The feedback from the regional coordination centres shall be shared among TSOs and DSOs at least to the ones belonging to the same synchronous area</p>	<p>Art 59(7)</p> <p>CogenEurope supports the principle that requirements are defined in the most efficient way and taking in consideration their impact on the grid.</p>	
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TITLE V - Derogations

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 60			
Article 61			
Article 62			
Article 63			
Article 64			
Article 65			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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TITLE VI - Transitional arrangements for emerging technologies

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 66			
Article 67			
Article 68			
Article 69			
Article 70			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

Please upload figures or tables if necessary

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TITLE VII - Final provisions

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 71			
Article 72			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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Other additional provisions

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions	Reasoning	Relation to other provisions
Other new provisions	<p>ANNEX I Additional Requirements applicable to Electricity Storage Modules</p> <p>Annex text amendment proposal as reported in EG Storage Phase II Final Report shall be used as starting point for drafting Annex I</p>	<p>See previous comment related to energy storage module.</p> <p>CogenEurope supports the proposed text delivered by EG storage.</p> <p>Note: the expectation is that the text is inclusive for the multiple energy technology to come and does not create any barrier or limitation to development of sector coupling technology.</p>	

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FILE UPLOAD

Please upload the Word file (downloaded from the **Instruction** section) containing all your amendment proposals in the Track Changes mode.

The maximum file size is 1 MB

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