

Proposals for amendments to the Demand Connection Code

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) 2016/1388 of 17 August 2016 establishing a **Network Code on Demand Connection** ('NC DC').

For amendment proposals concerning Network Code on Requirements for Generators ('NC RfG'), please go to the form: [NC RfG](#).

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

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Find out more how we process your data: <https://www.acer.europa.eu/the-agency/about-acer/data-protection>

* Name of the stakeholder:

EFAC

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Germany

* 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:

Accredited Certification Bodies

* 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 NC DC 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_DC_stakeholder_name"), please upload it in the last section of this form (FILE UPLOAD)

[Download the Word file \(NC DC\)](#)

Step 2

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


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.

	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 DC 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.

Example

This section shows an example of an input to the survey on the NC RfG. The input process is the same for the NC DC survey.

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 DC Whereas section

	Amendment proposal	Reasoning	Relation to other provisions
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			
(11)			
(12)			
(13)			
(14)			
(15)			
(16)			
(17)			
(18)			
(19)			
(20)			
(21)			
(22)			
(23)			

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

	Proposal for new recitals	Reasoning	Relation to other provisions
New recitals			

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)			
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)			
Article 2(16)			
Article 2(17)			
Article 2(18)			
Article 2(19)			
Article 2(20)			
Article 2(21)			
Article 2(22)			

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

	Proposal for new definitions	Reasoning	Relation to other provisions
New definitions	<p>'component' means any hardware element or software application having an impact on the electrical characteristics and /or operation of a demand facility or a demand unit. As examples, components can be a protection relay, an automatic voltage regulator, a controller on active or reactive power consumption, a static synchronous compensator, a synchronous condenser, etc..</p>	<p>definition aligned to IGD on Compliance Verification (2021);</p>	<p>All articles where equipment certificates are referred to</p>

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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			
Article 3			
Article 4			
Article 5			
Article 6			
Article 7			
Article 8			
Article 9			
Article 10			
Article 11			

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 provisions			

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TITLE II - Connection of transmission-connected demand facilities, transmission-connected distribution facilities and distribution systems

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 12			
Article 13			
Article 14			
Article 15			
Article 16			
Article 17			
Article 18			
Article 19			
Article 20			
Article 21			
Article 22			
Article 23			
	<p>1. An ION shall entitle the transmission-connected demand facility owner or transmission-connected distribution system operator to operate the transmission-connected demand facility, the transmission-connected distribution facility, or the transmission-connected distribution system by using the grid connection for a limited period of time.</p> <p>2. An ION shall be issued by the relevant TSO, subject to completion of the data and study review process as required by this</p>		

Article.

3. With regard to the data and study review, the relevant TSO shall have the right to request that the transmission-connected demand facility owner or transmission-connected distribution system operator provide the following:

- (a) an itemised statement of compliance;
- (b) detailed technical data of the transmission-connected demand facility, the transmission-connected distribution facility or the transmission-connected distribution system relevant to the grid connection as specified by the relevant TSO;
- (c) equipment certificates issued by an authorised certifier in respect of transmission-connected demand facilities, transmission-connected distribution facilities and transmission-connected distribution systems, where these are relied upon as part of the evidence of compliance;
- (d) simulation models, as specified in Article 21 and required by the TSO;
- (e) studies demonstrating expected steady-state and dynamic performance as required

in Articles 43, 46 and 47;
(f) details of intended practical method of completing compliance tests according to Chapter 2 of Title IV.

4. The relevant TSO

(a) should specify the certification scheme(s) according to Article 40 (1) based on which equipment certificates are accepted;

(b) shall specify which specified requirements according to Article 41 are accepted.

5. The maximum period during which the transmission-connected demand facility owner or transmission-connected distribution system operator may maintain ION status shall be 24 months. The relevant TSO is entitled to specify a shorter ION validity period. An extension of the ION shall be granted only if the transmission-connected demand facility owner or transmission-connected distribution system operator has made substantial progress towards full compliance. Outstanding issues shall be clearly identified at the time of requesting extension.

6. An extension of the period during which the transmission-

Article 24

connected demand facility owner or transmission-connected distribution system operator may maintain ION status, beyond the period established in paragraph 4, may be granted if a request for a derogation is made to the relevant TSO before the expiry of that period in accordance with the derogation procedure laid down in Article 50.

1. An ION shall entitle the transmission-connected demand facility owner or transmission-connected distribution system operator to operate the transmission-connected demand facility, the transmission-connected distribution facility, or the transmission-connected distribution system by using the grid connection for a limited period of time.

2. An ION shall be issued by the relevant TSO, subject to completion of the data and study review process as required by this Article.

3. With regard to the data and study review, the relevant TSO shall have the right to request that the transmission-connected demand facility owner or transmission-connected

new paragraph 4 definition according to IGD on Compliance Verification (2021); to ensure, that an acceptance of equipment certificates is facilitated by a clear specification by the TSO on
a) respectively accepted certification schemes and
b) respectively accepted specified requirements

new articles 34 and 35 providing details on certification schemes and specified requirements

distribution system operator
provide the following:

- (a) an itemised statement of compliance;
- (b) detailed technical data of the transmission-connected demand facility, the transmission-connected distribution facility or the transmission-connected distribution system relevant to the grid connection as specified by the relevant TSO;
- (c) equipment certificates issued by an authorised certifier in respect of transmission-connected demand facilities, transmission-connected distribution facilities and transmission-connected distribution systems, where these are relied upon as part of the evidence of compliance;
- (d) simulation models, as specified in Article 21 and required by the TSO;
- (e) studies demonstrating expected steady-state and dynamic performance as required in Articles 43, 46 and 47;
- (f) details of intended practical method of completing compliance tests according to Chapter 2 of Title IV.

4. The relevant TSO

- (a) should specify the

certification scheme(s) according to Article 34 (1) based on which equipment certificates are accepted;

(b) shall specify which specified requirements according to Article 35 are accepted.

5. The maximum period during which the transmission-connected demand facility owner or transmission-connected distribution system operator may maintain ION status shall be 24 months. The relevant TSO is entitled to specify a shorter ION validity period. An extension of the ION shall be granted only if the transmission-connected demand facility owner or transmission-connected distribution system operator has made substantial progress towards full compliance. Outstanding issues shall be clearly identified at the time of requesting extension.

6. An extension of the period during which the transmission-connected demand facility owner or transmission-connected distribution system operator may maintain ION status, beyond the period established in paragraph 4, may be granted if a request for a derogation is made to the relevant

	TSO before the expiry of that period in accordance with the derogation procedure laid down in Article 50.		
Article 25			
Article 26			

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 provisions			

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TITLE III - Connection of demand units used by a demand facility or a closed distribution system to provide demand response services to system operators

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 27			
Article 28			
Article 29			
Article 30			
Article 31			
	<p>1. The operational notification procedure for a demand unit within a demand facility or a closed distribution system connected at a voltage level of or below 1 000 V shall comprise an installation document.</p> <p>2. The installation document template shall be provided by the relevant system operator, and the contents agreed with the relevant TSO, either directly or indirectly through a third party.</p> <p>3. Based on an installation document, the demand facility owner or the CDSO shall submit information, directly or indirectly through a third party, to the relevant system operator or relevant TSO. The date of this submission shall be prior to the offer in the market of the capacity of the demand response by the demand unit. The requirements set in the installation document shall</p>		

Article 32

differentiate between different types of connections and between the different categories of demand response services.

4. For subsequent demand units with demand response, separate installation documents shall be provided.

5. The content of the installation document of individual demand units may be aggregated by the relevant system operator or relevant TSO.

6. The installation document shall contain the following items:

- (a) the location at which the demand unit with demand response is connected to the network;
- (b) the maximum capacity of the demand response installation in kW;
- (c) the type of demand response services;
- (d) the demand unit certificate and the equipment certificate as relevant for the demand response service, or if not available, equivalent information;
- (e) the contact details of the demand facility owner, the closed distribution system operator or the third party aggregating the demand units from the demand facility or

new paragraph 7 definition according to IGD on Compliance Verification (2021); to ensure, that an acceptance of equipment certificates is facilitated by a clear specification by the TSO on
a) respectively accepted certification schemes and
b) respectively accepted specified

new articles articles 34 and 35 providing details on certification schemes and specified requirements

	<p>the closed distribution system.</p> <p>7. The relevant TSO</p> <p>(a) should specify the certification scheme(s) according to Article 34 (1) based on which equipment certificates are accepted;</p> <p>(b) shall specify which specified requirements according to Article 35 are accepted.</p>		
Article 33			

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 provisions			

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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 34			
Article 35			
Article 36			
Article 37			
Article 38			
Article 39			
Article 40			
Article 41			
Article 42			
Article 43			
Article 44			
Article 45			
Article 46			
Article 47			

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>CHAPTER 1</p> <p>Equipment Certificates and Prototype Declarations</p> <p>Article 34</p> <p>Formal Requirements on and Classification of Equipment Certificates</p> <p>1. Any equipment certificate issued under the regime of this regulation and applied in the context of Title II, Title III or Title IV shall fulfil the following requirements:</p> <p>(a) The equipment certificate shall be based on a certification scheme in accordance with ISO/IEC 17067. The certification scheme shall define:</p> <p>(i) the scope of the certification;</p> <p>(ii) the specified requirement which the conformity assessment is based on according to Article 41;</p> <p>(iii) The evaluation and assessment methodology and criteria. Evaluation schemes may be subject to separate standards, guidelines and regulations outside the certification scheme, but must be clearly referenced to;</p> <p>(iv) The monitoring system with respect to the validity of the</p>		

certificate.

(b) If not otherwise specified by the certification scheme based on which the equipment certificate is issued according to (a), the equipment certificate shall provide the following information as a minimum in a clear, structural manner on its cover page:

(i) Unambiguous Type designation of the equipment to be certified;

(ii) Type of the equipment;

(iii) Designation of the issuing authorised certifier, including a reference to its accreditation certificate, i.e. the national accreditation authority's seal granted to the authorised certifier;

(iv) A reference to the standard ISO/IEC 17065;

(v) Certificate's unambiguous identifier;

(vi) Name and address of the certificate holder;

(vii) Designation of the specified requirement the conformity assessment is based on;

(viii) Designation of certification scheme(s) that has been applied and of further evaluation scheme(s) (if any);

- (ix) Brief, but complete conformity statement, designating any limitations of the equipment's conformity with respect to specified requirements which the conformity assessment is based on;
 - (x) Indication of whether the equipment requires additional components to maintain conformity and whether these components must also be certified separately;
 - (xi) Designation of any limitations of the applicability of the certificate;
 - (xii) Date of issue and definition of the validity period of the certificate.
- (c) In addition, if not otherwise specified by the certification scheme based on which the equipment certificate is issued according to (a) the equipment certificate shall provide the following information as a minimum:
- (i) Full overview on the results of the conformity assessment (detailed conformity statement), indicating any limitations or additional remarks;
 - (ii) Overview on the relevant technical data and software versions. Characteristic documents, i.e. manufacturers' declarations shall be indicated that describe that equipment or components in more

- detail;
- (iii) Schematic illustration of the main components, if applicable, illustration of communication interfaces between hardware components;
 - (iv) If applicable, clear designation of the components taken into account via component certificates, stating the component certificates' identifier;
 - (v) Name and identification number of the validated equipment model (if any). File name(s) and checksum(s) of the model file(s) as a 128-bit hash value generated according to Message-Digest Algorithm 5 (MD5);
 - (vi) Designation of the software environment and its version number in which the equipment's simulation model was validated (if model exists);
 - (vii) A reference to the manufacturer's quality management system (ISO 9001 certificate);
 - (viii) The excerpts to the test reports (if available; may be attached as an annex to the certificate);
 - (ix) The detailed evaluation report (may be attached as an annex to the certificate).
- (d) The equipment certificate's

validity shall be restricted to a maximum of five years.

2. Equipment certificates issued under the regime of this regulation and applied in the context of Title II, Title III or Title IV are classified as:

(a) Demand unit certificates: the demand unit certificate shall demonstrate the conformity of the demand unit with the specified requirements according to Article 41 at the demand unit's terminals. The conformity assessment shall be based on the following evaluation schemes, if not otherwise stated in the certification scheme the demand unit certificate is based on:

- (i) Type testing results based on testing standards, guidelines and regulations and performed and published by an accredited testing laboratory according to ISO/IEC 17025 accreditation standard with the demand unit as the device under test;
- (ii) Component certificates according to (b) if available;
- (iii) Manufacturers declaration on the demand unit's capability as a comprehensible presentation of the functional design of the demand unit with regards to the specified

requirements to be assessed.

If type testing has not been performed on the demand unit under certification an application of other type testing results according to Article 42 is eligible.

A demand unit certificate should unambiguously refer to one or more demand unit simulation model(s) that have been validated according to a validation guideline that is defined in the certification scheme. The simulation model shall be capable to the requirements of Article 21 and Title IV, Chapter 4, where applicable.

A demand unit certificate may be applied to facilitate a statement of conformity at the connection point of a demand facility where the demand unit is installed by

- (i) steady-state and dynamic simulations executed with the validated demand unit simulation model;
- (ii) straight forward application of the demand unit's type testing results;
- (iii) calculations applying the demand unit's type testing results.

(b) Component certificates: the component certificate shall demonstrate the conformity of the component with, in general, selected

New articles 34-37 (combined in a dedicated chapter) to provide a detailed scheme on equipment certificates and to introduce the concept of prototype declarations. Article 34 (1) provides formal requirements, extending the definitions with respect to the certification scheme (Article 34 (1) (a)), the content and structure (Article 34 (1) (b/c)) and the validity (Article 34 (1) (d)).

Article 34 (2) provides a classification of equipment certificates into demand units, components and demand facility certificates according to the IGD on Compliance Verification (2021).

Article 35 (1) introduces the 4

New provisions	<p>specified requirements according to Article 41 which the component has an impact on. The conformity assessment shall be based on the following evaluation schemes, if not otherwise stated in the certification scheme the component certificate is based on:</p> <p>(i) Type testing results based on testing standards, guidelines and regulations and performed and published by an accredited testing laboratory according to ISO/IEC 17025 accreditation standard with the component as the device under test;</p> <p>(ii) Manufacturers declaration on the component's capability as a comprehensible presentation of the functional design of the component with regards to the (selected) specified requirements to be assessed.</p> <p>A component certificate may unambiguously refer to one or more component simulation model(s) that have been validated according to a validation guideline that is defined in the certification scheme. The simulation model shall be capable to the requirements of Article 21 (6) (c) and Title IV, Chapter 4, where applicable.</p> <p>(c) Demand facility</p>	<p>options on which specified requirements the conformity assessment of an equipment certificate might be based on, and which might hence be accepted by TSO (according to amended articles 24 and 32):</p> <ol style="list-style-type: none"> 1. the requirements as published by the TSO (i.e. approved by the national entity) 2. requirements as set out by the DCC in terms of the most stringent requirements 3. requirements as set out by European standards (i.e. EN 50549-1/-2) (here: with respect to the consumption mode of storages!) 4. the capabilities of the equipment as declared by the manufacturer. <p>(Note: testing guideline TS 50549-10 will introduce the concept of capability testing and certification!).</p> <p>Article 35 (2) opens the option for the TSO to accept equipment certificates based on requirements other than the TSO's ones and specifies that eventually additional information on the compliance to the TSO's requirements need to be provided.</p> <p>Article 35 (3) provides the option of selective certification on only distinguished electrical characteristics of the demand unit /</p>	<p>All articles that refer to equipment certificates, i.e. in Title III and IV. In particular, if article 35 is not accepted, the level of acceptance of certificates by TSO as amended in article 24 and 32 needs to be further detailed there.</p>
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certificates: the demand facility certificate shall demonstrate the conformity of the demand facility with the specified requirements according to Article 41 at the connection point. The conformity assessment shall be based on the following evaluation schemes, if not otherwise stated in the certification scheme the demand facility certificate is based on

- (i) applying the statement(s) of conformity on demand unit(s) and component(s) installed in the demand facility as provided in the equipment certificates of these demand unit(s) and component(s);
- (ii) steady-state and dynamic simulations executed with the validated demand unit simulation model(s) and component simulation model(s) (if applicable);
- (iii) documentation and declaration by the manufacturer(s) of additional equipment installed in the demand facility that does not provide an equipment certificate (e. g., cables, transformers, substations etc.)
- (iv) documentation by the relevant system operator on the network characteristics at the connection point and on specific setpoint parameters with respect to

component

EFAC recommends these additional options on certification as they will promote and accelerate the availability of certificates for the benefit of demand facilities conformity assessment.

Article 36 introduces the concept of family grouping in order to facilitate the certification of non-tested demand units (components) within a product series.

Article 37 introduces the concept of prototype declaration to facilitate the operational notification of innovative equipment where no certificates can be made available due to still ongoing testing and modelling.

Here, the concept proposed by EFAC is close to the well elaborated German approach on PGUs. EFAC is convinced that these clarification will promote the provision and application of equipment certificates into the notification process and will, thus, reduce the struggle many MS are facing today due to unclear definitions and knowledge of formal requirements. Especially a clear obligation to the TSO to specify what certification programmes and requirements the TSO is willing to accept will help a lot to deploy

the specified requirements under certification.

Article 35

Specified Requirements

1. According to Article 40 (a) and (b) vii the specified requirements based on which the conformity of the equipment under certification is assessed need to be clearly identified within the equipment certificate. For any equipment certificate issued under the regime of this regulation and applied in the context of Title III or Title IV the respective specified requirement shall be one of the following:

- (a) requirements of general application under this Regulation as established by relevant system operators or TSOs, approved by the entity designated by the Member State and published according to the provisions of Article 6 (1);
- (b) Requirements as set out by this regulation. Where requirements are not defined as unambiguous parameters but as ranges, the most stringent criteria, i.e. parameter setting shall be subject to the conformity assessment. The equipment certificate shall clearly indicate what type(s) A-D and

certificates in the overall process.

synchronous area(s) the requirements applied for the conformity assessment refer to;

(c) requirements as set out by European standards on grid connection;

(d) the outmost technical capability of the equipment with respect to general grid connection requirements as declared by the manufacturer of the equipment. Obligations for the manufacturer declaration on the equipment's capability shall be defined in the certification scheme;

2. Relevant system operators may accept equipment certificates whose conformity assessment is based on specified requirements according to (1) (a) approved by entities of other Member States. In this case, the relevant system operator shall specify which additional information needs to be provided next to the equipment certificate in order to demonstrate the compliance of the equipment with the established requirements of general application under this Regulation approved by its entity,

3. In general, the conformity statement of an equipment certificate shall comprise all assessment criteria provided by the

specified requirements in accordance with (1). In addition, equipment certificates shall be eligible where the conformity statement covers only selected specified requirements (e.g. reactive power, etc.).

The restriction of the conformity statement of such selective (or: partial) equipment certificates to the selected requirements shall be clearly indicated on the cover page of these certificates.

Article 36

Product Series of Equipment for Certification

The application of the results of a conformity assessment of one equipment to other equipment within a given product series that does not provide defined evaluation measure, i.e. type testing, for the purpose of equipment certification is eligible based on the respective provisions of the certification scheme the equipment certificate is based on.

Article 37

Prototype Declaration

1. A prototype equipment is the first item of equipment of a type that undergoes significant technical development or innovation, as well

as any further item of equipment of that type that is put into service within two years of the first item of equipment of that prototype equipment being commissioned. Significant technical developments and innovations are deemed if components or software versions are changed in such a way that the electrical behaviour of the equipment on the grid changes significantly or that an equivalent electrical behaviour is achieved by another technical development and innovation.

2. A prototype declaration issued by an authorized certifier shall demonstrate that the prototype equipment complies with the requirement of general application established under this Regulation. I. e., the prototype declaration shall comprise:

- (a) A declaration of partial or full conformity to the requirements of general application established under this Regulation;
- (b) A declaration that the prototype equipment provides a significant technical development or innovation;
- (c) An indication of differences to existing and already certified equipment, if applicable;

(d) Technical data according to the requirements of general application established under this Regulation.

3. Within the two-year prototype status period starting with the commissioning of the first prototype equipment of this type, a prototype declaration is deemed to be equivalent to an equipment certificate in the course of the operational notification of demand facility under the provisions of Title II or Title III on the following conditions, unless the relevant system operator does not specify additional requirements on the operational notification of such prototypes:

(a) An equipment certificate is provided within the two-year prototype status period demonstrating the conformity to the requirements of general application established under this Regulation at least to the same extent as stated by the prototype declaration;

(b) The regular demonstration that the demand facility complies with the requirements of general application established under this Regulation is provided according to the provisions of Title II and Title III for the operational notification

	<p>demand facilities within one year after the equipment certificate for the prototype equipment has been issued.</p> <p>4. The prototype declaration's validity terminates with the end of the two-year prototype status or the publication of the respective equipment certificate, whatever is earlier.</p>		
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TITLE V - Applications and derogations

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 48			
Article 49			
Article 50			
Article 51			
Article 52			
Article 53			
Article 54			
Article 55			

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 provisions			

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TITLE VI - Non-binding guidance and monitoring of implementation

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 56			
Article 57			

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 provisions			

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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 58			
Article 59			

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 provisions			

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ANNEX I

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

	Proposal for new articles in this section	Reasoning	Relation to other provisions
Amendments to Annex I			

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ANNEX II

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

	Proposal for new articles in this section	Reasoning	Relation to other provisions
Amendments to Annex II			

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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			

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FILE UPLOAD

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

The maximum file size is 1 MB

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