

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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* Name of the stakeholder:

Edison S.p.A.

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Italy

* 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:

[REDACTED]

* 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.

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

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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>1) 'Electric vehicle charging station' means the infrastructure necessary to safely conduct electrical energy between the electricity supply grid and the electric vehicle.</p> <p>2) 'one-way electric vehicle charging station' means the infrastructure necessary to safely conduct electrical energy from the electricity supply grid or from other electrical means to the electric vehicle with demand-only behavior.</p> <p>3) 'bi-directional electric vehicle charging station' means the infrastructure necessary to conduct electrical energy safely from the electricity supply grid or from other electrical means to the electric vehicle and from the electric vehicle to the electricity supply grid with both generation and demand behavior.</p>	<p>1) These definitions are incorporated to develop Article 5 and include Electric vehicle charging points</p> <p>2) These definitions are incorporated to develop Article 5 and include Electric vehicle charging points</p> <p>3) These definitions are incorporated to develop Article 5 and include Electric vehicle charging points</p>	<p>1) Article 5</p> <p>2) Article 5</p> <p>3) Article 5</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 5 (2) to be deleted.	Current provision establishes that “Any pumping module within a pump-storage station that only provides pumping mode shall be subject to the requirements of this Regulation and shall be treated as a demand facility”. In our view, connection of pumping facilities should be regulated in the Generation Connection NC. Including such assets in the present NC leads to unnecessary overlaps and confusion.	
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		<p>1) Application to electric vehicle charging points This Regulation shall apply to unidirectional recharging points that operate solely as a demand facility. Bi-directional charging points shall also be subject to the requirements for generators regulated in Regulation (EU) 2016/631 as regards their behaviour when feeding electricity into the grid.</p> <p>2) Taking into account the possible increasing constraints on DSO networks, DSOs may include requirements that introduce a coordinated reduction of energy consumption from EV charging infrastructures to ensure grid security in emergency state.</p> <p>Additional mandatory capabilities imposed on EV charging infrastructures are not justified and should not be included within Demand Connection Network Code. Additional capabilities could</p>	

	<p>1) Art 3.1 (e): new electric vehicle charging points. Bi-directional charging points shall also be subject to the requirements for generators regulated in Regulation (EU) 2016 /631 as regards their behaviour when feeding electricity into the grid</p> <p>2) Recommendations to address EV charging infrastructure grid connection bottlenecks:</p> <ul style="list-style-type: none"> - Requirements regarding Power consumption limitation by the DSO in case of grid contingency (ON /OFF and setpoint) <p>3) DSR facilities All reference in the DCC should be removed as all markets have qualification requirements and validation procedures. The present requirements only limit market participation.</p>	<p>therefore be imposed only to EV charging infrastructures offering flexibility services to system operators and should be addressed as market pre-qualification requirements (outside the scope of DCC NC).</p>	
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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			
Article 24			
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	Delete points (f) and (g)	Points (f) and (g) should be part of an equipment technical standard document rather than a Network Code.	
Article 30	Delete points (c)	Point (c) should be part of an equipment technical standard document rather than a Network Code.	
Article 31			
Article 32			
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	<p>Chapter III could be transferred within the new NC on DSR, alongside art 9 (with reference to point 1.d -provisions related to chapter 3.)</p> <p>All reference in the DCC to Demand Response should be removed as all markets have qualification requirements and validation procedures. The present requirements only limit market participation.</p>		<p>Requirements for units providing demand side services (flexibility services) should be included in the future NC on Demand Side Flexibility</p> <p>According to the current legal framework, demand response services provided to the system operator by demand units are enumerated in a catalogue of Article 27(1) of NC DC.</p> <p>Technical requirements concerning the connection of units providing these services are laid down in Articles 28-30 of NC DC, should the unit fall under the scope of the NC DC</p> <p>All requirements for demand response services provided to the system operator by demand units should be included in the future NC on Demand Side Flexibility.</p> <p>Since the connection to the grid is a different aspect from the provision of services to SOs, we suggest carrying over the technical requirements to provide demand</p>

	<p>DSO network starts to be smart and equipping network users with smart meters and systems, thus enable the development of new services and products. In parallel, it should support customers that want to actively participate in the energy market, through aggregation, demand management, peer-to-peer trading, etc. There is a need for many new regulations, tools and products in this new area. The new regulations should be interrelated to each other and resulting from each other, which is possible only in a new code, developed from the beginning, based on a new approach to the sector and new conditions.</p>	<p>response services from the DCC Regulation to the new NC on Demand Side Flexibility. As a result, the scope of the RfG and DCC Regulations would be limited to capabilities for grid connection while all requirements set in prequalification processes for the provision of SO services would be in the new NC on Demand Side Flexibility.</p>
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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
New provisions			

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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.

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Contact

[Contact Form](#)