

# 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:

Enel SpA

\* 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:

Enel Spa is a European energy/electricity company, covering the activities within the entire value chain of electricity process

\* 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

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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 \(NC DC\)](#)**

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### ***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	<b>FILE UPLOAD</b>

## 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			

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## TITLE I - General provisions

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 1			
Article 3	Amending 3.1d	If the requirements are necessary, then they should apply to all demand units (or all new demand units). If they are not necessary, then they should be removed. Imposing them only on demand units that provide demand response causes an unnecessary barrier to participation.	
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	<p>New articles under Chapter I</p> <p>a) New article. 8.</p> <p>b) New article 9.</p>	<p>a)It is proposed to include the treatment to be considered for storage units. Obviously, for all storage system with size includable in Type A and Type B PGMs, the technical specifications in detail shall be defined directly in EN 50549 family standards.</p> <p>b)It is proposed to include the treatment to be considered for storage units. Obviously, for all storage system with size includable in Type A and Type B PGMs, the technical specifications in detail shall be defined directly in EN 50549 family standards.</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

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 27	Should be deleted	<p>Network Code to be developed by ACER as required by EC (ref Dir 944/19).</p> <p>Any requirements that relate only to the provision of demand response are not conditions of connection, so they do not belong in the Demand Connection Code.</p>	ACER scoping sent to the ED (1 February 2022)

Article 28	Should be deleted	<p>Same as above reasoning.</p> <p>Furthermore, for art 28. 2( a-c,k) These requirements should not be imposed only on demand units that provide demand response. Either delete from the DCC, or apply to all demand units (or all new demand units).</p> <p>Further, Article 28.2 (d-j, l), These requirements should not be imposed only on demand units that provide demand response. Either delete from the DCC, or apply to all demand units (or all new demand units).</p> <p>These are not connection requirements, so do not belong in the DCC. They should be deleted.</p>	<p>a) same as above for the entire Chapter III...</p> <p>b) These requirements have nothing to do with the provision of demand response. If they are necessary, then they should apply to all demand units (or all new demand units). If they are not necessary, then they should be removed.</p> <p>Imposing them only on demand units that provide demand response causes an unnecessary barrier to participation.</p> <p>This is especially problematic where only one particular asset on a customer's site might be involved in providing the response: while there may be some justification for imposing such requirements on that particular asset (so that it'll be able to provide the expected response even under extreme conditions), it may be impracticable to prove that other unrelated assets on the site are able to do so.</p>
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Article 29	Should be deleted	<p>same as above reasoning</p> <p>Furthermore, for art 29. 2( a-c) These requirements should not be imposed only on demand units that provide demand response. Either delete from the DCC, or apply to all demand units (or all new demand units).</p> <p>Further Article 29.2 (d-g), These are not connection requirements, so do not belong in the DCC. They should be deleted.</p>	<p>same as above for entire Chapter III</p> <p>b) These requirements have nothing to do with the provision of demand response. If they are necessary, then they should apply to all demand units (or all new demand units). If they are not necessary, then they should be removed.</p> <p>Imposing them only on demand units that provide demand response causes an unnecessary barrier to participation.</p> <p>This is especially problematic where only one particular asset on a customer's site might be involved in providing the response: while there may be some justification for imposing such requirements on that particular asset (so that it'll be able to provide the expected response even under extreme conditions), it may be impracticable to prove that other unrelated assets on the site are able to do so.</p> <p>Also, These belong in definition of the demand response services, not in the DCC. Or perhaps in a technical standard.</p>
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Article 30	Should be deleted	<p>same as above reasoning</p> <p>Article 30.2 (c), These are not connection requirements, so do not belong in the DCC. They should be deleted.</p>	<p>same as above for entire Chapter III</p> <p>Also, These belong in definition of the demand response services, not in the DCC. Or perhaps in a technical standard.</p>
Article 31	Should be deleted	same as above reasoning	<p>same as above for entire Chapter III</p> <p>If there is to be a flexibility register, it would replace these paperwork requirements.</p>
Article 32	Should be deleted	same as above reasoning	<p>same as above for entire Chapter III</p> <p>If there is to be a flexibility register, it would replace these paperwork requirements.</p>
Article 33	Should be deleted	same as above reasoning	<p>same as above for entire Chapter III</p> <p>If there is to be a flexibility register, it would replace these paperwork requirements.</p>

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

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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	Should be deleted	These are not connection requirements, so do not belong in the DCC. They should be deleted.	These belong in definition of the demand response services, not in the DCC. Or perhaps in a technical standard.
Article 42			
Article 43			
Article 44			
Article 45	Should be deleted	These are not connection requirements, so do not belong in the DCC. They should be deleted	These belong in definition of the demand response services, not in the DCC. Or perhaps in a technical standard.
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

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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**

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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

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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

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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
Amendments to Annex I			

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## ANNEX II

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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
Amendments to Annex II			

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## Other additional provisions

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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

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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

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