**IFIEC Europe NC DCC - Justification**

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|  | Amendment proposal | Reasoning | Relation to other provision |
| (7) | / | As of this version 2.0 of DCC, it is important to tackle how “new” will be defined between the different versions of the NC DCC, in order to have a clear view on which requirements will be applicable to which parts of facilities, knowing that it is very unlikely that all assets of a facility will be modified at the same time.  The same applies to the definition of “existing” | Entire scope of DCC, this is an overall issue of versioning that should be tackled in a general way |
| (7) | The requirements of this Regulation also should not apply to new or existing demand facilities connected at the distribution level ~~unless they provide demand response services to relevant system operators and relevant TSOs.~~ | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| (10) | The requirements applicable to a demand facility connected to a transmission system should set out the capabilities at their interfaces | The scope of NC DCC is at the connection point (interface) with the grid of the system operator, which is different to the scope of RfG (on PGM level). This is a very important element that should be tackled for IFIEC Europe, as it has a.o. a very important impact on substantial modernisation |  |
| (12) | ~~The requirements applicable to a demand unit used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs should ensure the capacity to use the demand response over system operational ranges thereby minimising critical events.~~ | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| (13) | The administrative burdens and costs associated with providing demand response should be kept within reasonable limits~~, in particular as regards domestic consumers,~~ ~~who will play an increasingly important role in the transition to low carbon society~~ and their uptake should not be unnecessarily burdened with administrative tasks. | IFIEC Europe is of the opinion that this should be for all consumers, including non-residential consumers such as industrial consumers |  |
| Article 1(1) | 1.   This Regulation establishes a network code which lays down the requirements for grid connection of:   |  |  | | --- | --- | | (a) | transmission-connected demand facilities; |  |  |  | | --- | --- | | (b) | transmission-connected distribution facilities; |  |  |  | | --- | --- | | (c) | distribution systems, including closed distribution systems; |  |  |  | | --- | --- | | ~~(d)~~ | ~~demand units, used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs.~~ | | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 2(1) | ‘demand facility’ means a facility which consumes electrical energy | While IFIEC Europe at this point has not a better definition at hand, it is important to point out that this definition creates ambiguities. 1. All (electrical facilities) consume electrical energy. 2. Industrial sites, considered to be demand facilities, are sometimes net injecting rather than off-taking from the grid (e.g. consumption unit in maintenance but PGMs on site still producing electricity).  IFIEC Europe wonders whether the definition should not be adapted along the lines of “primarily taking off electricity from the grid” or “with a net off-take of the grid” (for which than also the period to consider to define this net offtake should be decided) | The modification of the definition of “demand facility” cascades throughout the NC DCC and should then be checked for necessary modifications based upon the new definition |
| Article 2(16) | ‘demand response active power control’ means demand within a demand facility or closed distribution system that can be made ~~is~~ available for modulation by the relevant system operator or relevant TSO in exchange for a remuneration, which results in an active power modification | IFIEC Europe insists that even though available capabilities **can** be put at the disposal of the relevant system operator or relevant TSO for modulation, this should not imply that these should not be remunerated as there are costs related to the provision (and also reservation if the case) of such capabilities by those system operators. |  |
| Article 2(17) | ‘demand response reactive power control’ means reactive power or reactive power compensation devices in a demand facility or closed distribution system that can be made ~~are~~ available for modulation by the relevant system operator or relevant TSO in exchange for a remuneration; | IFIEC Europe insists that even though available capabilities **can** be put at the disposal of the relevant system operator or relevant TSO for modulation, this should not imply that these should not be remunerated as there are costs related to the provision (and also reservation if the case) of such capabilities by those system operators. |  |
| Article 2(18) | ‘demand response transmission constraint management’ means demand within a demand facility or closed distribution system that can be made ~~is~~ available for modulation by the relevant system operator or relevant TSO to manage transmission constraints within the system in exchange for a remuneration; | IFIEC Europe insists that even though available capabilities **can** be put at the disposal of the relevant system operator or relevant TSO for modulation, this should not imply that these should not be remunerated as there are costs related to the provision (and also reservation if the case) of such capabilities by those system operators. |  |
| Article 3(1) | .   The connection requirements set out in this Regulation shall apply to:   |  |  | | --- | --- | | (a) | new transmission-connected demand facilities; |  |  |  | | --- | --- | | (b) | new transmission-connected distribution facilities; |  |  |  | | --- | --- | | (c) | new distribution systems, including new closed distribution systems; |  |  |  | | --- | --- | | ~~(d)~~ | ~~new demand units used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs.~~ | | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 4(1) | Removal of the references to “demand units used to provide demand response services” | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 4(2) | 2.   For the purposes of this Regulation, a transmission-connected demand facility, a transmission-connected distribution facility, a distribution system, or a demand unit that is, or can be, used by a demand facility or a closed distribution system to provide demand response services to a relevant system operator or relevant TSO, shall be considered as existing if | It is important to tackle how “existing” and “new” will be tackled with every following version of the NC DCC. This is also important in light of “substantial modernisation” of parts of demand facilities, as it is important to have a clear view which requirements (of which version of NC DCC) are applicable to which (part of the) facilities. |  |
| Article 4(3) | For that purpose a sound and transparent quantitative cost-benefit analysis shall be carried out, in accordance with Articles 48 and 49 and in coordination with the relevant stakeholders | IFIEC Europe insists that the relevant stakeholders are actively involved in this CBA. |  |
| Article 10 | The Agency for the Cooperation of Energy Regulators (the Agency), in close cooperation with the European Network of Transmission System Operators for Electricity (ENTSO for Electricity), shall organise stakeholder involvement, regarding the requirements for the grid connection of transmission-connected demand facilities, transmission-connected distribution facilities, distribution systems ~~and demand units used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs,~~ and other aspects of the implementation of this Regulation. This shall include regular meetings with stakeholders to identify problems and propose improvements notably related to the requirements for grid connection of transmission-connected demand facilities, transmission-connected distribution facilities, distribution systems ~~and demand units used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs~~. | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 19(1) | each transmission-connected distribution system operator and, where specified by the TSO, transmission-connected demand facility owner, shall provide capabilities that enable automatic ‘low frequency’ disconnection of a specified proportion of their demand. The relevant TSO may specify a disconnection trigger based on a combination of low frequency and rate-of-change-of-frequency while taking into account not only system security but also costs and risks for the concerned demand facilities. Moreover, system operators will take duly into account all existing protection elements concerning low frequency.; | IFIEC Europe insists that even though transmission-connected demand facilities and transmission-connected distribution systems “shall provide capabilities that enable automatic ‘low frequency’ disconnection of a specified proportion of their demand. The relevant TSO may specify a disconnection trigger based on a combination of low frequency and rate-of-change-of-frequency”, it is important to understand that especially for industrial consumers such disconnection could lead to very important damages and related costs. IFIEC Europe thus insists that these capabilities, even though required to be provided, should not be lightly used as disconnection might be fast but reconnection might take very long (even up to weeks or months in case of important damages to installations) and would involve sometimes very important costs for these facilities and could even create safety risks. IFIEC Europe understands that the application of LFDD falls under other Network Codes but insists that these cost and safety elements are taken into account for the application. |  |
| Article 27 | / | While article 27 in itself does not pose any issues for IFIEC Europe, as it only creates different categories of demand response services, IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code.  In (2) IFIEC Europe finds it important that “Demand facilities and closed distribution systems **may** provide demand response services to relevant system operators and relevant TSOs” as an obligation would constitute curtailment (governed by other codes) or obligatory consumption (without legal basis). IFIEC Europe is adamant that demand side response remains voluntary and remunerated. |  |
| Article 28(2) | ~~Demand units with demand response active power control, demand response reactive power control, or demand response transmission constraint management shall comply with the following requirements, either individually or, where it is not part of a transmission-connected demand facility, collectively as part of demand aggregation through a third party:~~   |  |  | | --- | --- | | ~~(a)~~ | ~~be capable of operating across the frequency ranges specified in Article 12(1) and the extended range specified in Article 12(2);~~ |  |  |  | | --- | --- | | ~~(b)~~ | ~~be capable of operating across the voltage ranges specified in Article 13 if connected at a voltage level at or above 110 kV;~~ |  |  |  | | --- | --- | | ~~(c)~~ | ~~be capable of operating across the normal operational voltage range of the system at the connection point, specified by the relevant system operator, if connected at a voltage level below 110 kV. This range shall take into account existing standards and shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(d)~~ | ~~be capable of controlling power consumption from the network in a range equal to the range contracted, directly or indirectly through a third party, by the relevant TSO;~~ |  |  |  | | --- | --- | | ~~(e)~~ | ~~be equipped to receive instructions, directly or indirectly through a third party, from the relevant system operator or the relevant TSO to modify their demand and to transfer the necessary information. The relevant system operator shall make publicly available the technical specifications approved to enable this transfer of information. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(f)~~ | ~~be capable of adjusting its power consumption within a time period specified by the relevant system operator or the relevant TSO. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(g)~~ | ~~be capable of full execution of an instruction issued by the relevant system operator or the relevant TSO to modify its power consumption to the limits of the electrical protection safeguards, unless a contractually agreed method is in place with the relevant system operator or relevant TSO for the replacement of their contribution (including aggregated demand facilities' contribution through a third party);~~ |  |  |  | | --- | --- | | ~~(h)~~ | ~~once a modification to power consumption has taken place and for the duration of the requested modification, only modify the demand used to provide the service if required by the relevant system operator or relevant TSO to the limits of the electrical protection safeguards, unless a contractually agreed method is in place with the relevant system operator or relevant TSO for the replacement of their contribution (including aggregated demand facilities' contribution through a third party). Instructions to modify power consumption may have immediate or delayed effects;~~ |  |  |  | | --- | --- | | ~~(i)~~ | ~~notify the relevant system operator or relevant TSO of the modification of demand response capacity. The relevant system operator or relevant TSO shall specify the modalities of the notification;~~ |  |  |  | | --- | --- | | ~~(j)~~ | ~~where the relevant system operator or the relevant TSO, directly or indirectly through a third party, command the modification of the power consumption, enable the modification of a part of its demand in response to an instruction by the relevant system operator or the relevant TSO, within the limits agreed with the demand facility owner or the CDSO and according to the demand unit settings;~~ |  |  |  | | --- | --- | | ~~(k)~~ | ~~have the withstand capability to not disconnect from the system due to the rate-of-change-of-frequency up to a value specified by the relevant TSO. With regard to this withstand capability, the value of rate-of-change-of-frequency shall be calculated over a 500 ms time frame. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(l)~~ | ~~where modification to the power consumption is specified via frequency or voltage control, or both, and via pre-alert signal sent by the relevant system operator or the relevant TSO, be equipped to receive, directly or indirectly through a third party, the instructions from the relevant system operator or the relevant TSO, to measure the frequency or voltage value, or both, to command the demand trip and to transfer the information. The relevant system operator shall specify and publish the technical specifications approved to enable this transfer of information. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1).~~ | | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code.  IFIEC Europe believes in the value of the provision yet considers this best to be tackled elsewhere then in the network code for the abovementioned reasons. |  |
| Article 29(2) | ~~Demand units with demand response system frequency control shall comply with the following requirements, either individually or, where it is not part of a transmission-connected demand facility, collectively as part of demand aggregation through a third party:~~   |  |  | | --- | --- | | ~~(a)~~ | ~~be capable of operating across the frequency ranges specified in Article 12(1) and the extended range specified in Article 12(2);~~ |  |  |  | | --- | --- | | ~~(b)~~ | ~~be capable of operating across the voltage ranges specified in Article 13 if connected at a voltage level at or above 110 kV;~~ |  |  |  | | --- | --- | | ~~(c)~~ | ~~be capable of operating across the normal operational voltage range of the system at the connection point, specified by the relevant system operator, if connected at a voltage level below 110 kV. This range shall take into account existing standards, and shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(d)~~ | ~~be equipped with a control system that is insensitive within a dead band around the nominal system frequency of 50,00 Hz, of a width to be specified by the relevant TSO in consultation with the TSOs in the synchronous area. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1);~~ |  |  |  | | --- | --- | | ~~(e)~~ | ~~be capable of, upon return to frequency within the dead band specified in paragraph 2(d), initiating a random time delay of up to 5 minutes before resuming normal operation.~~  ~~The maximum frequency deviation from nominal value of 50,00 Hz to respond to shall be specified by the relevant TSO in coordination with the TSOs in the synchronous area. For demand units connected at a voltage level below 110 kV, these specifications shall, prior to approval in accordance with Article 6, be subject to consultation with the relevant stakeholders in accordance with Article 9(1).~~  ~~The demand shall be increased or decreased for a system frequency above or below the dead band of nominal (50,00 Hz) respectively;~~ |  |  |  | | --- | --- | | ~~(f)~~ | ~~be equipped with a controller that measures the actual system frequency. Measurements shall be updated at least every 0,2 seconds;~~ |  |  |  | | --- | --- | | ~~(g)~~ | ~~be able to detect a change in system frequency of 0,01 Hz, in order to give overall linear proportional system response, with regard to the demand response system frequency control's sensitivity and accuracy of the frequency measurement and the consequent modification of the demand. The demand unit shall be capable of a rapid detection and response to changes in system frequency, to be specified by the relevant TSO in coordination with the TSOs in the synchronous area. An offset in the steady-state measurement of frequency shall be acceptable up to 0,05 Hz.~~ | | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code.  IFIEC Europe believes in the value of the provision yet considers this best to be tackled elsewhere then in the network code for the abovementioned reasons. |  |
| Article 32(3) | 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 differentiate between different types of connections and between the different categories of demand response services.~~ | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Art 32(4) | ~~For subsequent demand units with demand response, separate installation documents shall be provided.~~ | See above Article 32(3) |  |
| Art 32(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 the closed distribution system.~~ | | See above Article 32(3) |  |
| Art 34(2) | ~~Where the requirements of this Regulation are applicable to demand units used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs, the demand facility owner or the CDSO may totally or partially delegate to third parties tasks such as communicating with the relevant system operator or relevant TSO and gathering the documentation from the demand facility owner, the DSO or the CDSO evidencing compliance.~~  ~~Third parties shall be treated as single users with the right to compile relevant documentation and demonstrate compliance of their aggregated demand facilities or aggregated closed distribution systems with the provisions of this Regulation. Demand facilities and closed distribution systems providing demand response services to relevant system operators and relevant TSOs may act collectively through third parties.~~ | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 42 (1) | 1.   Simulation of the performance of a transmission-connected demand facility, a transmission-connected distribution facility, ~~or a demand unit with demand response very fast active power control within a demand facility or a closed distribution system~~ shall result in demonstrating whether the requirements of this Regulation have been fulfilled or not. | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 42(2) | Simulations shall be run in the following circumstances:   |  |  | | --- | --- | | (a) | a new connection to the transmission system is required; |  |  |  | | --- | --- | | (b) | ~~a new demand unit used by a demand facility or a closed distribution system to provide demand response very fast active power control to a relevant TSO has been contracted in accordance with Article 30~~; |  |  |  | | --- | --- | | (c) | a further development, replacement or modernisation of equipment takes place; |  |  |  | | --- | --- | | (d) | alleged incompliance by the relevant system operator with the requirements of this Regulation. | | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 45 | ~~The model of the demand unit used by a demand facility owner or a closed distribution system operator to provide demand response very fast active power control shall demonstrate the technical capability of the demand unit to provide very fast active power control to a low frequency event in the conditions set out in Article 30.~~  ~~2.   The simulation shall be deemed passed provided that the model demonstrates compliance with the conditions set out in Article 30~~ | IFIEC Europe is of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code. |  |
| Article 48 | / | As of this version 2.0 of DCC, it is important to tackle how “existing” will be defined between the different versions of the NC DCC, in order to have a clear view on which requirements will be applicable to which parts of facilities, and thus also knowing for which elements a CBA should be conducted. |  |
| Article 58 | / | This article will have to be reviewed in function of the outcome of the discussion and selected options regarding “versioning” of the NC DCC, in order to ensure that this issue is tackled correctly. (see also other points above on a.o. “new” and “existing” |  |
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