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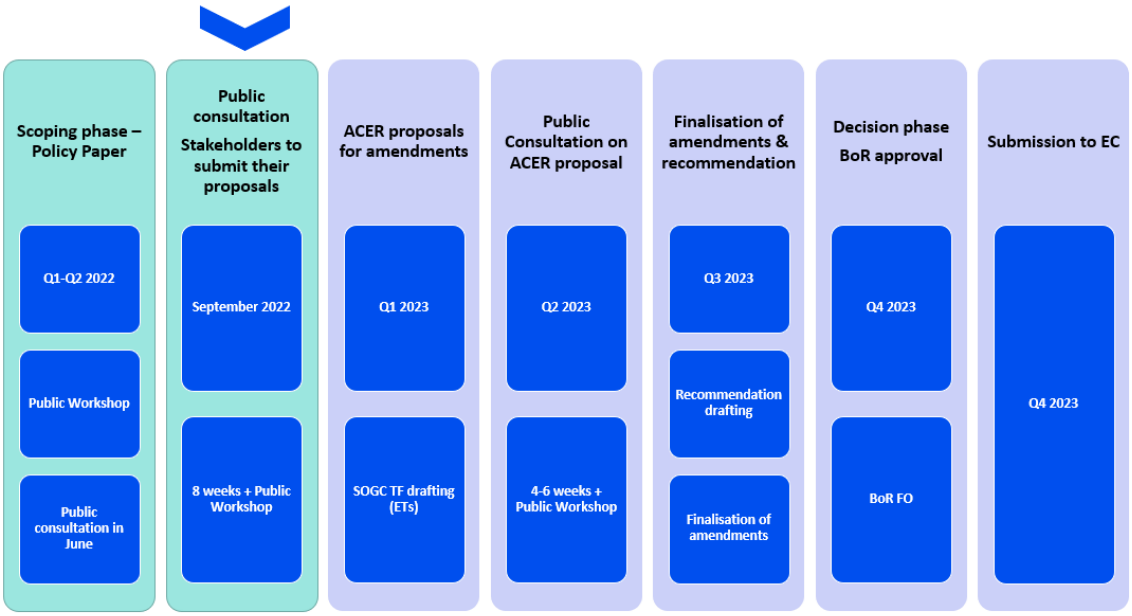
Proposals for amendments to the Demand Connection Code

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 21 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:

IFIEC Europe

* Contact person:

[redacted]

* Contact person's email address:

[redacted]

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

Belgium

* Type of the stakeholder:

- ○ Generator (including association)
- ◉ Consumer (including association)
- ○ Transmission system operator (including association)
- ○ Distribution system operator (including association)
- ○ Manufacturers (including association)
- ○ Academia/research institution
- ○ Regulatory authority
- ○ Other (please, elaborate)

Please, elaborate on your answer above, if necessary:

* 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.

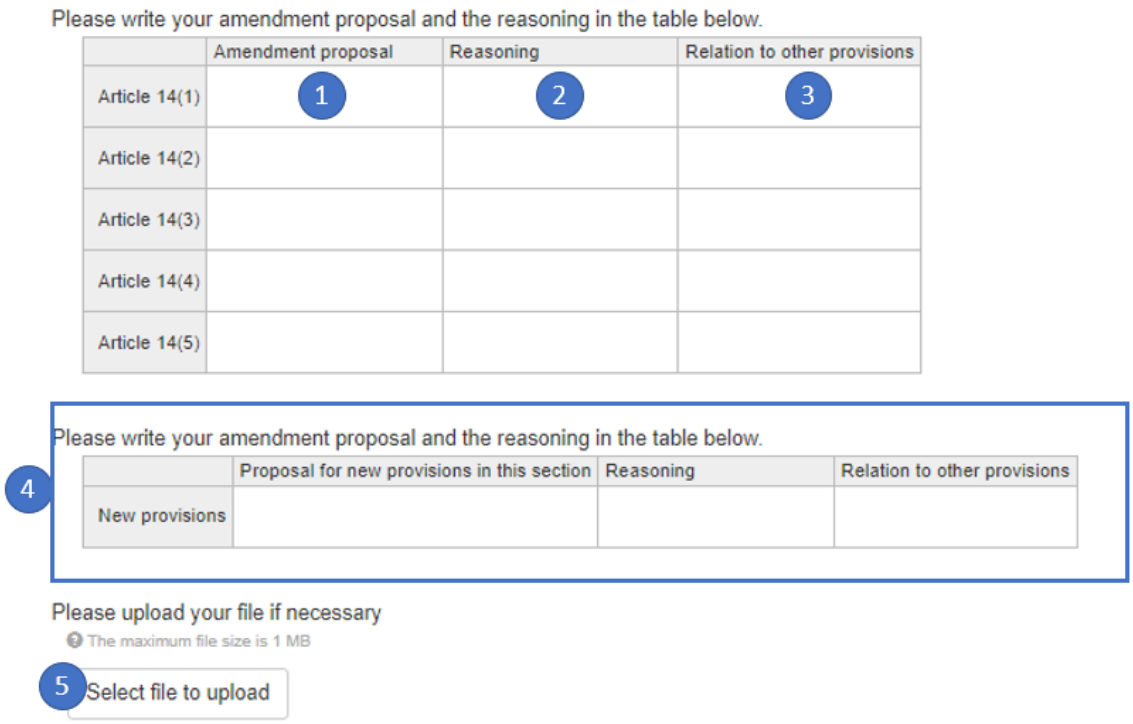
Step 1

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:

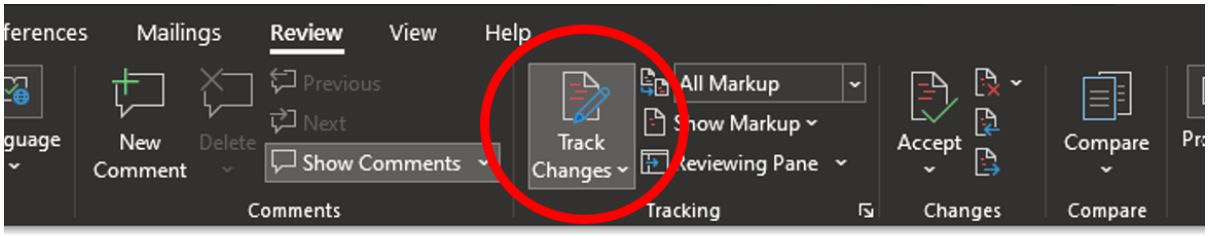


1. Propose an amended wording of the relevant provision, as you provided in the Word file.
2. Provide the motivation/reasoning behind your proposal.
3. Indicate (if any) which other provisions of the NC DC are impacted and may need to be amended following your proposal.
4. Provide (if any) your proposals 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

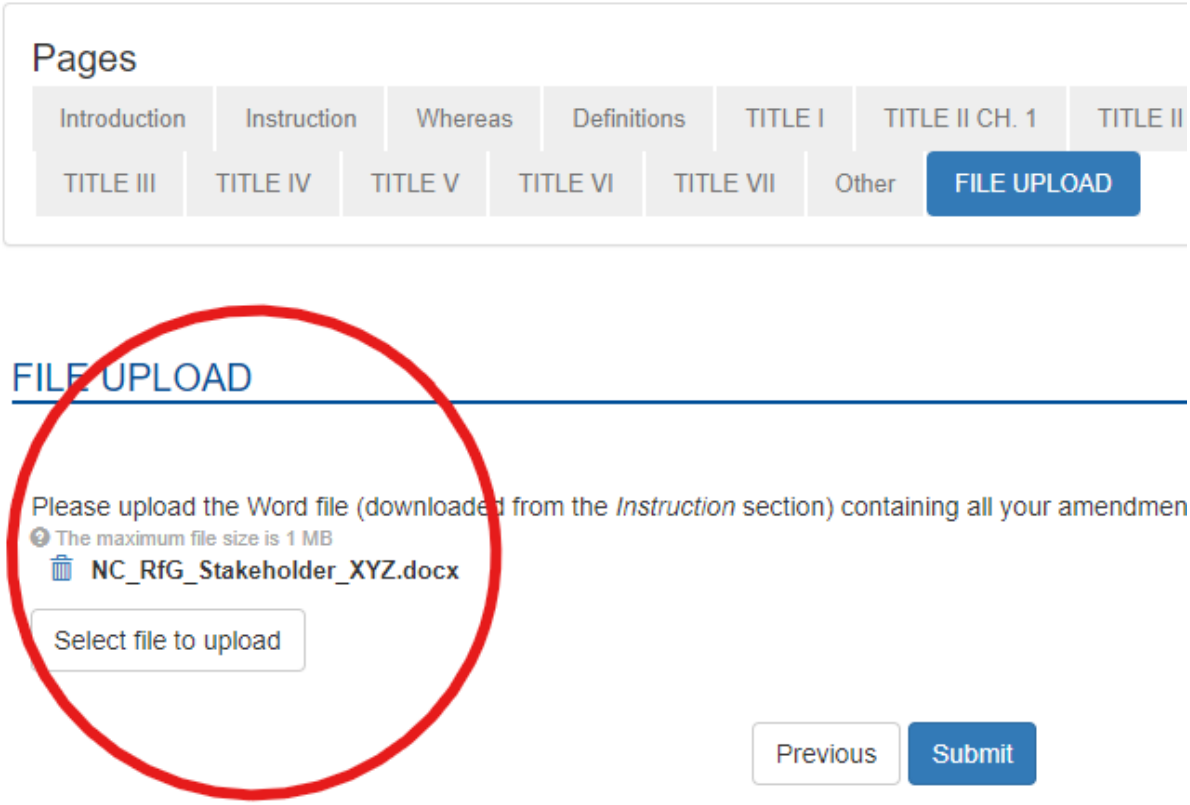
The system restoration requirements laid down ~~respectively~~ in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

Article 28

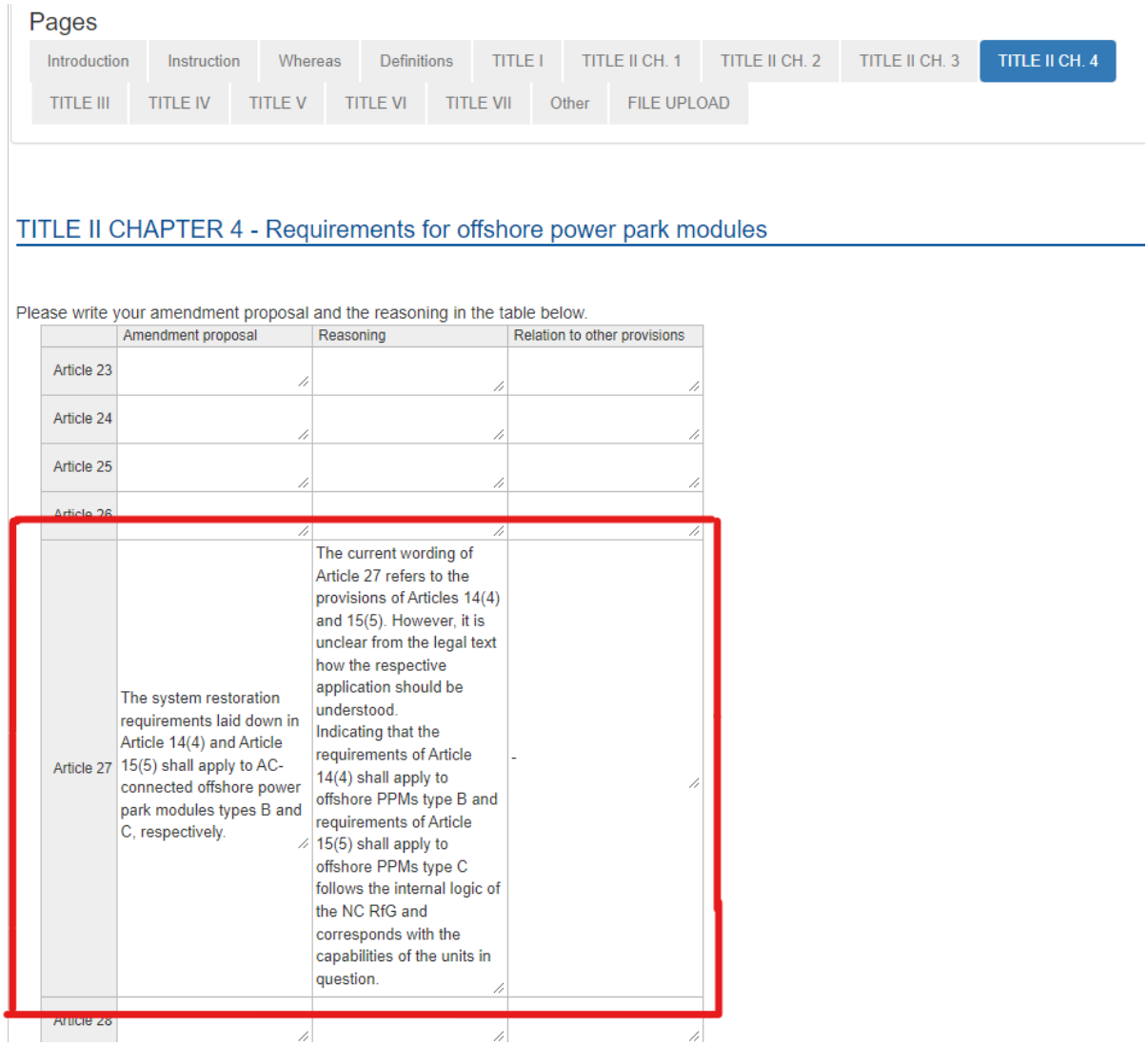
General system management requirements applicable to AC-connected offshore power park modules

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.



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.



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)	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.	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” Furthermore, 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	Entire scope of DCC, this is an overall issue of versioning that should be tackled in a general way

		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.	
(8)			
(9)			
(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	
(11)			

(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. (remove)	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 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	
(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	As ACER has not included the option to make proposals for Article 1, IFIEC Europe adds this here: 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; (removal op point (d))	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.	

Definitions (Article 2)

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

	Amendment proposal	Reasoning	Relation to other provisions
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(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)	‘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 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			

Please upload figures or tables if necessary

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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	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; (removal op point (d)	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 3	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; (removal op point (d))	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 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	

Article 4	Removal of the references to “demand units used to provide demand response services” 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 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	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. 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. IFIEC Europe insists that the relevant stakeholders are actively involved in this CBA.	
Article 5			
Article 6			
Article 7			
Article 8			
Article 9			

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 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	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 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			

Please upload figures or tables if necessary

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Please upload figures or tables if necessary

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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	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 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			

Please upload figures or tables if necessary

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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	/	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.	
	removal of: "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	IFIEC Europe is of the opinion that, while it is important that demand		

Article 28	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	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. 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	

	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-	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.	

	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). "		
	Removal of: "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		

Article 29	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. "		
Article 30			
Article 31			

Article 32	3. Removal of: "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." 4. removal of: "For subsequent demand units with demand response, separate installation documents shall be provided." 6. Removal of: "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	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.		

	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."		
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	Removal of: "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 35			
Article 36			

Article 37			
Article 38			
Article 39			
Article 40			
Article 41			
Article 42	1. Removal of: "or a demand unit with demand response very fast active power control within a demand facility or a closed distribution system" 2. Removal of: "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;"	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 43			
Article 44			

Article 45	Removal of: "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 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	/	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 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	/	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”	
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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