Contribution ID: 9d6ec5c1-e728-4135-877d-019f4751528c
Date: 28/11/2022 10:50:04

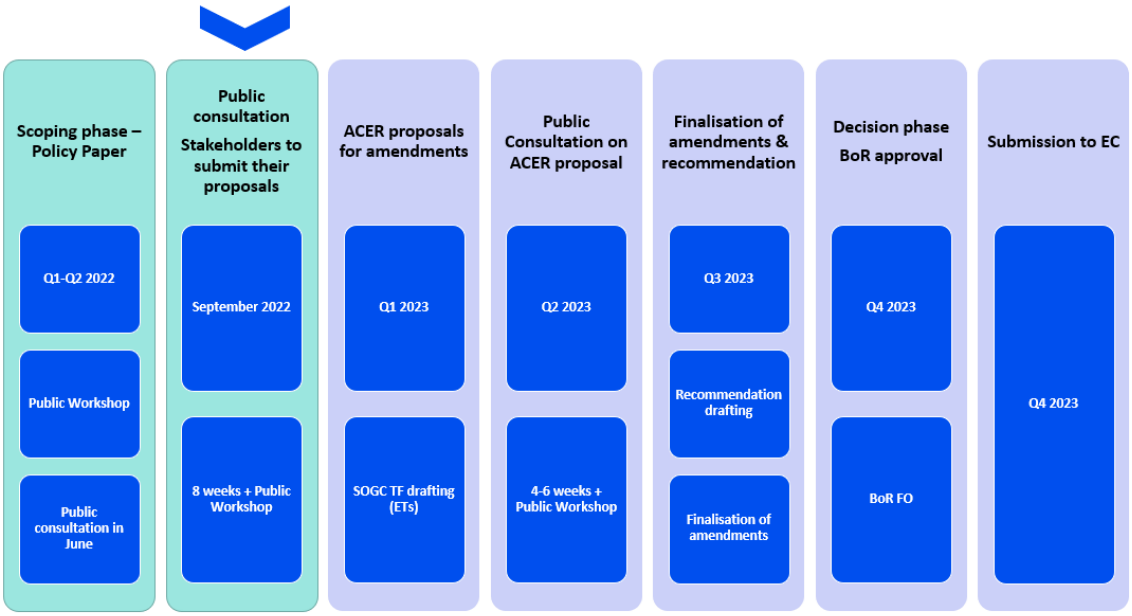
Proposals for amendments to the Requirements for Generators

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) 2016/631 of 14 April 2016 establishing a **Network Code on Requirements for Grid Connection of Generators** ('NC RfG').
For amendment proposals concerning Network Code on Demand Connection, please go to the form: **NC DC**.

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

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

* Name of the stakeholder:

Oesterreichs Energie

* Contact person:

[redacted]

* Contact person's email address:

[redacted]

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

Austria

* 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:

Association for generators, grid operators and traders

* 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 RfG 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.

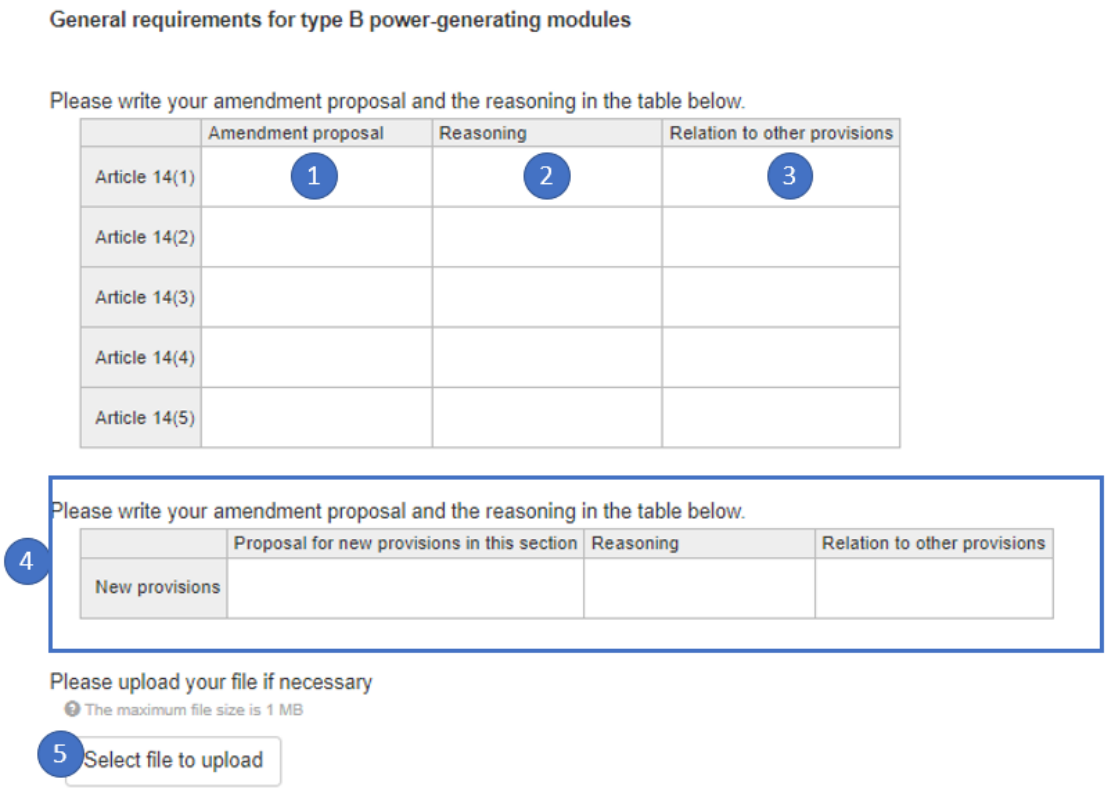
Step 1

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_RfG_stakeholder_name"), please upload it in the last section of this form (FILE UPLOAD)

Download the Word file (NC RfG)

Step 2

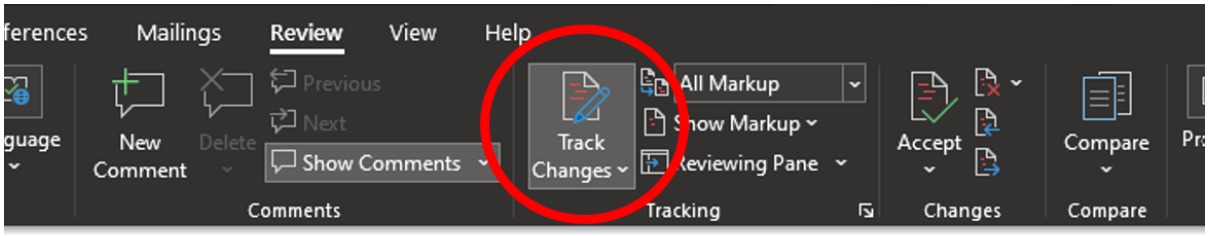
In addition, please use this form to motivate/reason your proposals, following the instructions:



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 RfG 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

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

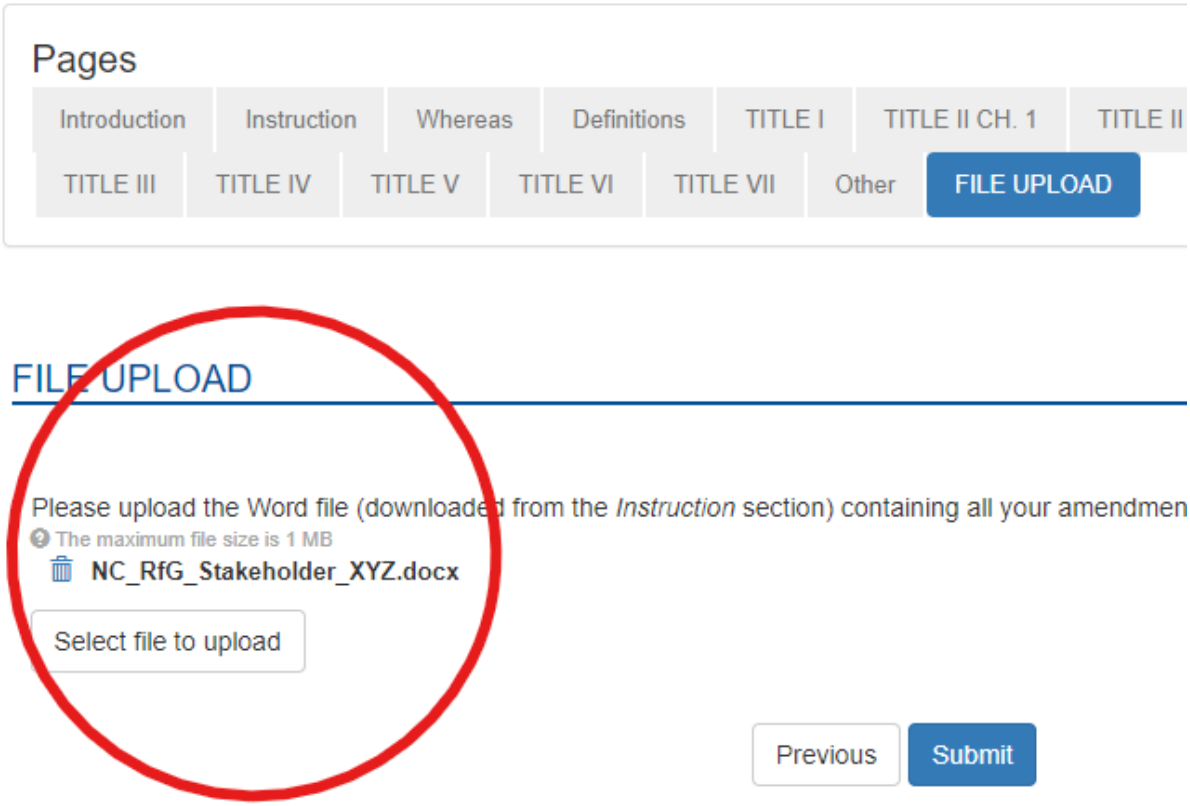
The system restoration requirements laid down ~~respectively~~ in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

Article 28

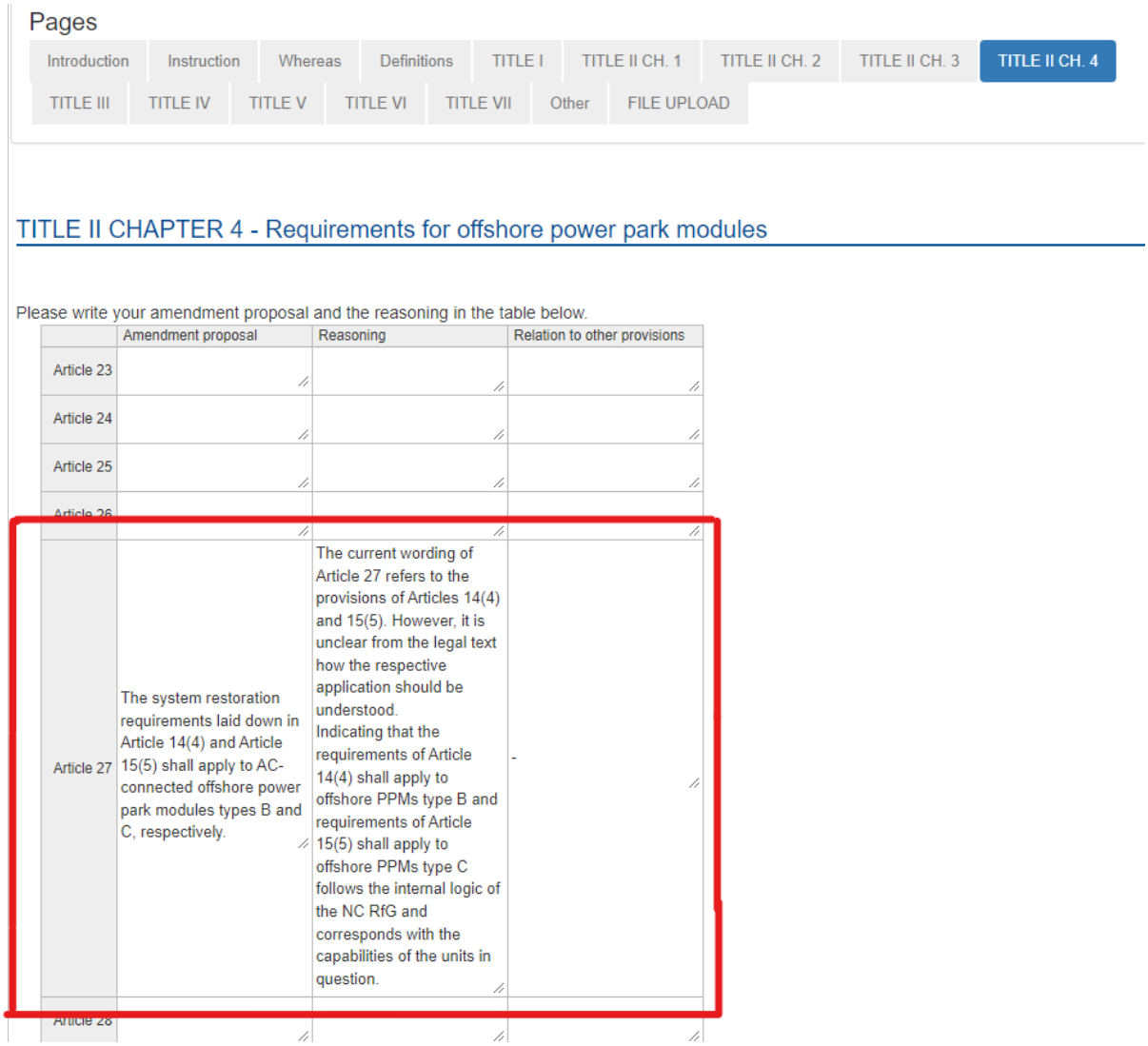
General system management requirements applicable to AC-connected offshore power park modules

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 RfG Whereas section

	Amendment proposal	Reasoning	Relation to other provisions
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			
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(22)			
(23)			
(24)			
(25)			

(26)			
(27)			
(28)			
(29)			
(30)			
(31)			

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

	Proposal for new recitals	Reasoning	Relation to other provisions
New recitals			

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)			
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)			
		Mixed customer sites (MCS) can be classified as a combination of demand facilities (DF) and power generating modules (PGM) that share a common connection point. Nowadays, the number of MCS is constantly increasing due to the installation of renewable energy source (RES) based generation at the sites of already existing DF. Depending on the specific combination of a MCS, only power may be drawn and there may be	

Article 2(16)	ad a term and delete a phrase	only partial or no feed-in (zero feed-in) from a PGM to the grid at the connection point. From Oesterreichs Energie point of view, any partial or zero feed-in at the connection point must not restrict the type classification (A/B /C/D) of a PGM and the corresponding national grid codes as long as synchronous operation with the public grid exists. In the case of MCS, the maximum continuous active power which a PGM can produce, less any demand or losses associated solely with facilitating the operation of that power-generating module, should be used for the type classification in accordance with the national thresholds. Taking this into account, Oesterreichs Energie suggests the following text modifications in the existing text of NC RfG: add "losses" and delete "and not fed into the network. Risks in case of deviating consideration: If only the actual feed-in at the grid connection point or virtual surplus feed-in is taken into account, most of the new PGM in MCS with partial or zero feed-in would not be able to be assigned to an		

		appropriate type according to NC RfG. In this case the following risks will arise: • Operational risks with regard to congestion/load flow consideration and power balance due to insufficient plannability (forecast), observability (operational information exchange) and missing capabilities to change the active power. • Increased risk of high generation loss in the event of grid disturbances in the grid due to lack of FRT capability with possibly serious effects on load flow, voltage and control area balance.	
Article 2(17)			
Article 2(18)			
Article 2(19)			
Article 2(20)			
Article 2(21)			
Article 2(22)			
Article 2(23)			
Article 2(24)			
Article 2(25)			
Article 2(26)			
Article 2(27)			
Article 2(28)			
Article 2(29)			

Article 2(30)			
Article 2(31)			
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Article 2(40)			
Article 2(41)			
Article 2(42)			
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Article 2(47)			
Article 2(48)			
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Article 2(56)			
Article 2(57)			
Article 2(58)			

Article 2(59)			
Article 2(60)			
Article 2(61)			
Article 2(62)			
Article 2(63)			
Article 2(64)			
Article 2(65)			

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

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 1			
Article 3	add (e)	16.7 Hz power supply system does not operate synchronously with the synchronous area	
Article 4			
		New PGM installations within MCS with a connection point ≥ 110 kV are to be considered as type D due to the voltage criterion according to Article 5(2) d) NC RfG. On the other hand, the exclusive consideration of the active power criteria would result in a classification as type A or type B for many small PGM. The costs associated with equipping the PGM with the necessary equipment to meet the requirements of type D facility would significantly degrade the economic viability of the projects and question their implementation. The principles of the NC RfG provide for proportionality and optimization of overall efficiency and overall costs to be taken into account. Furthermore, the non-realization of power generation plants in mixed systems (usually	

Article 5	add to (2)d "and Pmax ≥ 5 MW"	PV systems on the roofs of industrial buildings) is not in the sense of the European objectives for the cost-effective and efficient supply of electrical energy, especially from renewable resources. Therefore, an exemption from the voltage criterion according to Article 5(2) d) NC RfG for PGM with Pmax < 5 MW or a potentially smaller national B/C threshold should be included in a future version of NC RfG. Risks in case of deviating consideration: Meeting the type D requirements is expected to cause disproportionate significant additional costs at any time during the lifetime of the affected PGM. The additional costs would significantly jeopardize the profitability of the affected projects and thus the feed-in of CO2-free, renewable energy.	
Article 6			
Article 7			
Article 8			
Article 9			
Article 10			
Article 11			
Article 12			

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 articles			

Please upload figures or tables if necessary

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TITLE II CHAPTER 1 - General Requirements

General requirements for type A power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 13(1)	b, add sentence "RoCoF for Continental Europe: • ±2,0 Hz/s over a period of 0,5 s • ±1,5 Hz/s over a period of 1 s • ±1,25 Hz/s over a period of 2 s"	Article 13 (1) b add sentenceFrequency withstand capabilities are key for the design of a synchronous area robustness. Varying national requirements could lead to inefficiencies and an undefined behaviour within a synchronous area. Furthermore, the already existing implementation guidance documents (IGD) recommend already specific requirements for RoCoF, LFSM-O and –U.	
		General requirements The review of the technical requirements defined by NC RfG with regard to their applicability to pump storage hydro PGM has demonstrated that a distinction between the relevant generation technologies and the operation modes is necessary for assessing and evaluating whether these requirements can reasonably be applied. If no changes in a future version of NC RfG are implemented, the requirements for pump storage hydro PGM will remain ambiguous and subject to differences in	

Article 13(2)	add to (a):"LFSM-O and -U thresholds for Continental Europe: 50,2 Hz / 49,8 Hz add to (e): “If the response time is greater than stated above, the power-generating facility owner shall justify the higher response times, providing technical evidence to the relevant TSO.”	interpretation and therefore a lack of harmonization. The recommendations summarized in the respective PSH expert group report shall therefore be included in a future version of NC RfG. Specific requirements regarding variable-frequency pump storage hydro power plants Taking into account stability aspects, “hard-coded” LFSM-O or –U response time requirements might not be applicable/technically feasible for new or substantially modified variable-frequency pump storage hydro PGM technologies. In this case, the robustness of the frequency dependent functions, limiting components (e.g. dynamics of pressure pipes) and potential damages to the PGM or other facilities, due to too fast response times have to be considered. Therefore, Oesterreichs Energie proposes to add the following sentence to potentially “hard-coded” LFSM-O or –U response time requirements	
Article 13(3)			
Article 13(4)			
Article 13(5)			

Article 13(6)			
Article 13(7)			

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	add Article 13 (8) and (9)	The two additional function Q(U) and P(U) are very helpful to integrate a lot of additional solar power into the existing LV-grids and due to a long tradition in Austria (since 2016) we know that almost all infeed converters can provide the function just by activating them in the software.	

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General requirements for type B power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 14(1)			
Article 14(2)			
Article 14(3)	add sentence as (c):"The respective over-voltage protection settings must not counteract the HVRT requirement. The relevant system operator may define other over-voltage protection settings, in order to ensure voltage quality criteria or the risk of high voltages for customers."	In the case of faults in electrical grids the situation right before fault clearance could have very low voltages at a given location. This aspects are already addressed by NC RfG by respective low-voltage ride through (LVRT) requirements. However, just after fault clearance, the voltage can recover very quickly, sometime towards values greater than 1.1 pu. PGM should therefore also withstand voltage overshoots for a given amount of time. Besides new HVRT requirements, Oesterreichs Energie proposes to add in parallel further clarifications: Article 14 (3) c "The respective over-voltage protection settings must not counteract the HVRT requirement. The relevant system operator may define other over-voltage protection settings, in order to ensure voltage quality criteria or the risk of high voltages for customers." These additional clarifications take	

		into account, that the recommended over-voltage protection settings in national grid codes usually require the fulfilment of voltage quality criteria (EN 50160) and the risk mitigation of high voltages for customers. With typical protection relays (U>, U>>) there could be a contradiction between the relevant system operator’s protection concept and the activation of HVRT in certain grid areas.	
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			

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General requirements for type C power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 15(1)			
Article 15(2)	add to (c) iii: If the response time is greater than stated above, the power-generating facility owner shall justify the higher response times, providing technical evidence to the relevant TSO."	General requirements The review of the technical requirements defined by NC RfG with regard to their applicability to pump storage hydro PGM has demonstrated that a distinction between the relevant generation technologies and the operation modes is necessary for assessing and evaluating whether these requirements can reasonably be applied. If no changes in a future version of NC RfG are implemented, the requirements for pump storage hydro PGM will remain ambiguous and subject to differences in interpretation and therefore a lack of harmonization. The recommendations summarized in the respective PSH expert group report shall therefore be included in a future version of NC RfG. Specific requirements regarding variable-frequency pump storage hydro power plants Taking into account stability aspects, “hard-coded” LFSM-O or –U response time requirements might not be applicable/technically	

		feasible for new or substantially modified variable-frequency pump storage hydro PGM technologies. In this case, the robustness of the frequency dependent functions, limiting components (e.g. dynamics of pressure pipes) and potential damages to the PGM or other facilities, due to too fast response times have to be considered. Therefore, Oesterreichs Energie proposes to add the following sentence to potentially “hard-coded” LFSM-O or –U response time requirements	
Article 15(3)			
Article 15(4)			
Article 15(5)			
Article 15(6)			

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			

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General requirements for type D power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 16(1)			
Article 16(2)			
Article 16(3)	add sentence as (d):"The respective over-voltage protection settings must not counteract the HVRT requirement. The relevant system operator may define other over-voltage protection settings, in order to ensure voltage quality criteria or the risk of high voltages for customers."	General requirements The review of the technical requirements defined by NC RfG with regard to their applicability to pump storage hydro PGM has demonstrated that a distinction between the relevant generation technologies and the operation modes is necessary for assessing and evaluating whether these requirements can reasonably be applied. If no changes in a future version of NC RfG are implemented, the requirements for pump storage hydro PGM will remain ambiguous and subject to differences in interpretation and therefore a lack of harmonization. The recommendations summarized in the respective PSH expert group report shall therefore be included in a future version of NC RfG. Specific requirements regarding variable-frequency pump storage hydro power plants Taking into account stability aspects, “hard-coded” LFSM-O or –	

		U response time requirements might not be applicable/technically feasible for new or substantially modified variable-frequency pump storage hydro PGM technologies. In this case, the robustness of the frequency dependent functions, limiting components (e.g. dynamics of pressure pipes) and potential damages to the PGM or other facilities, due to too fast response times have to be considered. Therefore, Oesterreichs Energie proposes to add the following sentence to potentially “hard-coded” LFSM-O or –U response time requirements	
Article 16(4)			

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			

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TITLE II CHAPTER 2 - Requirements for synchronous power-generating modules

Requirements for type B synchronous power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 17(1)			
Article 17(2)			
Article 17(3)			

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			

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Requirements for type C synchronous power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 18(1)			
Article 18(2)	decuple from fixed 1.1 pu figure 7	The currently existing reactive power requirements in Article 18 and 21 are not set for the whole operational voltage range, since the outer envelope is fixed with 1,1 pu. This error leads to an undefined reactive power capability in case of voltages greater than 1,1 pu (e.g. where the reference voltage 1 pu is equal to 110 or 220 kV).	

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			

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Requirements for type D synchronous power-generating modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 19(1)			
Article 19(2)			
Article 19(3)			

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			

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TITLE II CHAPTER 3 - Requirements for power park modules

Requirements for type B power park modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 20(1)			
Article 20(2)			
Article 20(3)			

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 figures or tables if necessary

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Requirements for type C power park modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 21(1)			
Article 21(2)			
Article 21(3)	decouple from fixed 1.1 pu figure 8	The currently existing reactive power requirements in Article 18 and 21 are not set for the whole operational voltage range, since the outer envelope is fixed with 1,1 pu. This error leads to an undefined reactive power capability in case of voltages greater than 1,1 pu (e.g. where the reference voltage 1 pu is equal to 110 or 220 kV).	

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			

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Requirements for type D power park modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 22			

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 figures or tables if necessary

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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			
Article 28			

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 articles			

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TITLE III - Operational notification procedure for connection

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 29			
Article 30			
Article 31			
Article 32			
Article 33			
Article 34			
Article 35			
Article 36			
Article 37			
Article 38			
Article 39			

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 articles			

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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 40			
Article 41			
Article 42			
Article 43			
Article 44			
Article 45			
Article 46			
Article 47			
Article 48			
Article 49			
Article 50			
Article 51			
Article 52			
Article 53			
Article 54			
Article 55			
Article 56			
Article 57			
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 articles			

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TITLE V - Derogations

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 60			
Article 61			
Article 62			
Article 63			
Article 64			
Article 65			

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 articles			

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TITLE VI - Transitional arrangements for emerging technologies

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 66			
Article 67			
Article 68			
Article 69			
Article 70			

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 articles			

Please upload figures or tables if necessary

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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 71			
Article 72			

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 articles			

Please upload figures or tables if necessary

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Other additional provisions

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

	Proposal for new provisions	Reasoning	Relation to other provisions
Other new provisions			

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FILE UPLOAD

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

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