

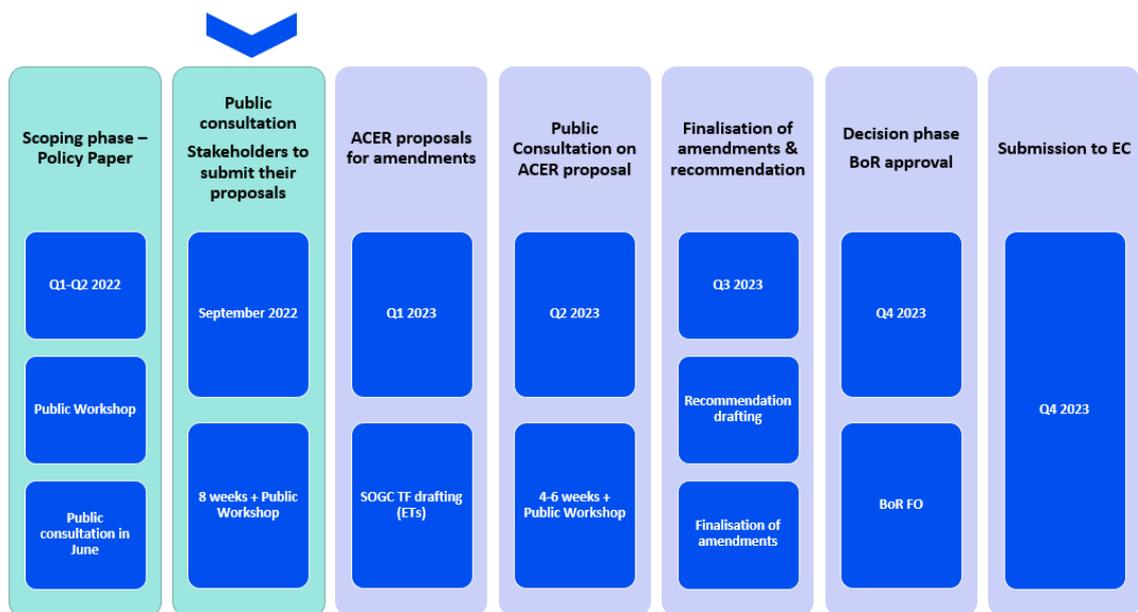
Proposals for amendments to the Requirements for Generators

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.

ACER is highly committed in processing personal data in a lawful way.

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

* Name of the stakeholder:

Volkswagen Group (Volkswagen, Audi, Porsche, Skoda, Seat, Elli)

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Germany

* 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:

EV manufacturer & CP manufacturer & EV aggregator

* 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:

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)	1	2	3
Article 14(2)			
Article 14(3)			
Article 14(4)			
Article 14(5)			

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

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
4	New provisions		

Please upload your file if necessary

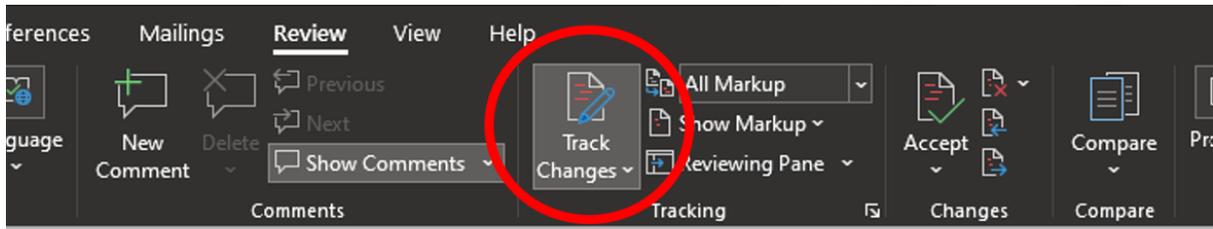
 The maximum file size is 1 MB

5

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

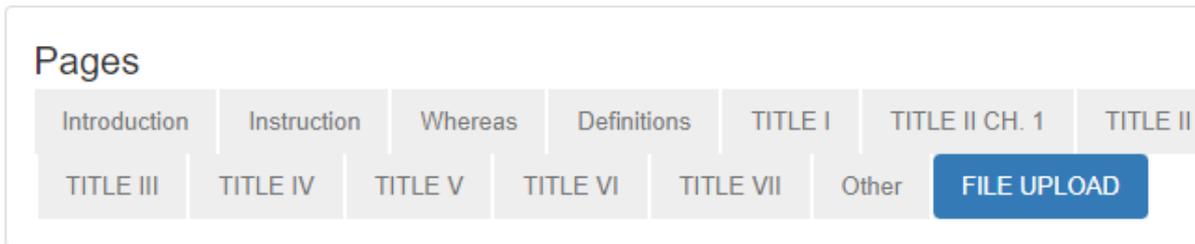
The system restoration requirements laid down respectively in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

Article 28

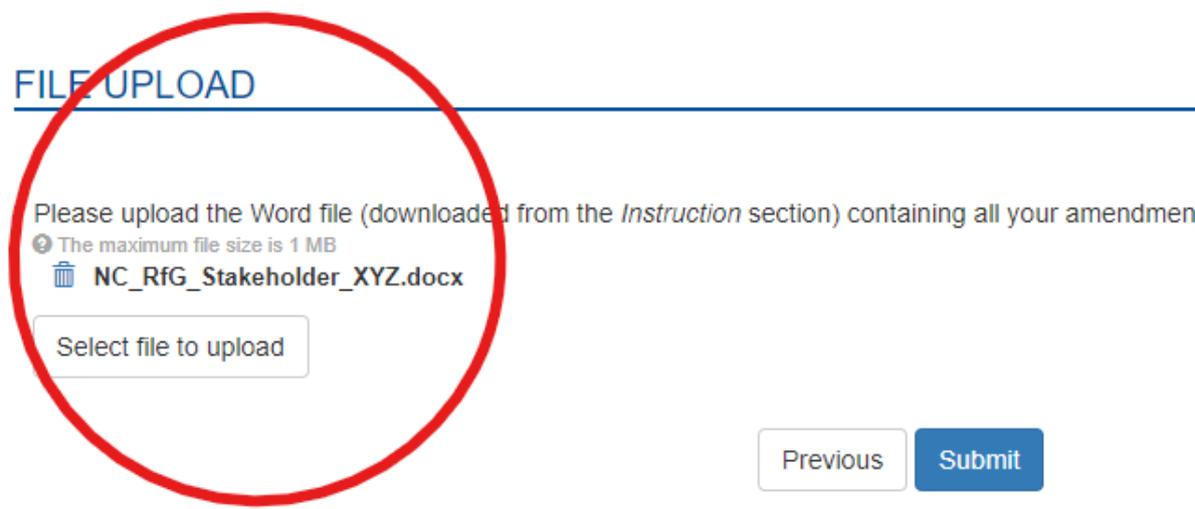
General system management requirements applicable to AC-connected offshore power park modules

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.



FILE UPLOAD



The stakeholder proceeds to motivate/reason their proposal. As they would like to propose an amendment to Article 27 of NC RfG, they enter **TITLE II CHAPTER 4** Section and insert the proposed amended wording and the reasoning (second step). As the proposed amendment of Article 27 does not affect other provisions, they leave the last column blank.

Pages

[Introduction](#)[Instruction](#)[Whereas](#)[Definitions](#)[TITLE I](#)[TITLE II CH. 1](#)[TITLE II CH. 2](#)[TITLE II CH. 3](#)[TITLE II CH. 4](#)[TITLE III](#)[TITLE IV](#)[TITLE V](#)[TITLE VI](#)[TITLE VII](#)[Other](#)[FILE UPLOAD](#)

TITLE II CHAPTER 4 - Requirements for offshore power park modules

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 23	//	//	//
Article 24	//	//	//
Article 25	//	//	//
Article 26	//	//	//
Article 27	The system restoration requirements laid down in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.	The current wording of Article 27 refers to the provisions of Articles 14(4) and 15(5). However, it is unclear from the legal text how the respective application should be understood. Indicating that the requirements of Article 14(4) shall apply to offshore PPMs type B and requirements of Article 15(5) shall apply to offshore PPMs type C follows the internal logic of the NC RfG and corresponds with the capabilities of the units in question.	//
Article 28	//	//	//

As the survey is long,

1. you have the possibility to edit your answer after submission. When clicking on "submit", you will be given a contribution ID, which you can then use to access your contribution here. This allows you to proceed in steps.
2. we kindly suggest that you download the entire survey as .pdf (link on the right), prepare your answers and then upload them at once in the EU Survey Tool, to avoid a session timeout on submission.

The maximum length of each cell is 5000 characters. This is the maximum technical limit set by the EUsurvey tool, which cannot be increased.

Whereas Section

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

Numbers in the first column correspond with the recitals of the NC RfG Whereas section

	Amendment proposal	Reasoning	Relation to other provisions
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)	<p>add: Mass market small DERs on household-level however, should not be treated differently throughout the European union to not risk free market distortions by local (protectionist) grid connection rules.</p>	<p>Small assets do not need different rules in the union but better common standardisation. This avoids discrimination by local stakeholders and system operators on manufacturers.</p> <p>If the EU wants to scale up production and flexibility in the next 10 years, common and faster processes and rules are absolutely essential.</p>	
(8)			

(9)	<p>add: Photovoltaic, wind, combined heat and power, stationary storage, and mobile storage shall not be collected together, as their generation patterns differ strongly and independently.</p>	<p>Each of these asset types are inherently variable in their behavior and generation characteristics: PV generation fluctuates based on the sun, win generation on the presence of wind, CHP based on the need of heat and grid conditions, stationary storage and EV-based generation based on grid conditions and local economics (independent of other generation sources).</p> <p>An AC connected storage system should not be discriminated to a DC connected storage system, which would be the case if the AC one falls over the type threshold (or other national thresholds)</p>	
(10)			
(11)			
(12)			
(13)			
(14)			
(15)			
(16)			
(17)			
(18)			
(19)			
(20)			
(21)			

(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			

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 2(1)			
Article 2(2)			
Article 2(3)			
Article 2(4)			
Article 2(5)			
Article 2(6)			
Article 2(7)			
Article 2(8)			
Article 2(9)			
Article 2(10)			
Article 2(11)			
Article 2(12)			
Article 2(13)			
Article 2(14)			
Article 2(15)			
Article 2(16)	<p>add: eg. for reactive power provision. The maximum capacity for power generating facilities shall be defined by the maximum possible simultaneous generation, eg. a charging park with a power limiting energy management system or a lower power line or fuse capacity than the sum of the charge points shall have a Pmax of this lower limit.</p>	<p>Pmax of a module and Pmax of a park and Pmax of a facility (at connection point) must be differentiated.</p>	

Article 2(17)	add: A unit that is theoretically capable of generating electricity, but operating in a load-only mode, shall not be subject to this definition, but shall instead be considered as a simple load.;	Electric vehicles and backup storages should be allowed to connect to the grid as loads without any RfG requirements if they do not intent to generate electricity.	
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)			
Article 2(32)			
Article 2(33)			
Article 2(34)			
Article 2(35)			
Article 2(36)			
Article 2(37)			
Article 2(38)			
Article 2(39)			

Article 2(40)			
Article 2(41)			
Article 2(42)			
Article 2(43)			
Article 2(44)			
Article 2(45)			
Article 2(46)			
Article 2(47)			
Article 2(48)			
Article 2(49)			
Article 2(50)			
Article 2(51)			
Article 2(52)			
Article 2(53)			
Article 2(54)			
Article 2(55)			
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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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	delete 2 (d) storage devices...	Storage (mobile and stationary) devices in generation mode should definitely be included!	
Article 4			
	<p>1. The power-generating modules shall comply with the requirements on the basis of their maximum capacity according to the categories set out in paragraph 2.</p> <p>2. Power-generating modules within the following categories shall be considered as significant:</p> <p>(a)</p> <ul style="list-style-type: none"> - maximum capacity between 0,8 kW and 11kW (Type A1) -maximum capacity between 11kW and 50kW (Type A2) -maximum capacity between 50kW and 250kW (Type A3) -maximum capacity between 250kW and 1MW (Type A4) <p>(b) maximum capacity at or above a threshold specified in Table 1; or</p> <p>(c) connection point below 110 kV and maximum capacity at or above a threshold specified in Table 1; or</p>	<p>A small PV installation or bidirectional charge point in a big factory with a connection point to TSO grid, should not comply with TYPE D standards as the effect on the grid is not significant and certified inverters or communication devices do either not exist or are not economical viable.</p>	

Article 5

(d) connection point at 110 kV or above (type D) and a maximum capacity or above a threshold specified in Table 1 (same value as type C). A power-generating module is also of type D if its connection point is below 110 kV and its maximum capacity is at or above a threshold specified in Table 1.

Defined values
Defined values for thresholds for type B, C and D power-generating modules
Synchronous areas Limit for maximum capacity threshold from which a power-generating module is of type B Limit for maximum capacity threshold from which a power-generating module is of type C Limit for maximum capacity threshold from which a power-generating module is of type D

Continental Europe	1 MW	50 MW	75 MW
Great Britain	1 MW	50 MW	75 MW
Nordic	1,5 MW	10 MW	30 MW
Ireland and Northern Ireland	0,1 MW	5 MW	10 MW
Baltic	0,5 MW	10 MW	15 MW

+New sub-types are necessary to reflect the fleet of DERs that this regulation seeks to integrate into system operator participation. The vast majority of power-generating modules (by number) will occur below 50kW, which is why we suggest the delineations here... assets of 1kW should absolutely not be in the same group as assets of 99kW (or 1MW)!

Otherwise, a free and open market will continue to be hindered.

+It is important that small generators in mixed customer sites do not need to comply with all type D requirements!

+ All thresholds should be consistent throughout the EU and no member state shall have the right to change these. A connected European grid should follow the same rules and free market of generation technology must be ensured.

We suggest and support replacement values being developed by either ACER or the EC after reviewing current implementations in the member states.

+Electric vehicles are operated

3. Proposals for maximum capacity thresholds for types B, C and D power-generating modules shall be subject to approval by the relevant regulatory authority or, where applicable, the Member State. In forming proposals the relevant TSO shall coordinate with adjacent TSOs and DSOs and shall conduct a public consultation in accordance with Article 10. A proposal by the relevant TSO to change the thresholds shall not be made sooner than three years after the previous proposal.

4. Power-generating facility owners shall assist this process and provide data as requested by the relevant TSO.

3. Bidirectional cars and bidirectional vehicle chargers shall always be type A1 or A2, but never be considered as type B.

5. If, as a result of modification of the thresholds, a power-generating module qualifies under a different type, the procedure laid down in Article 4(3) concerning existing power-generating modules shall apply before compliance with the requirements for the new type is required.

6. Photovoltaic, wind, combined-heat-and-power, stationary

differently than other assets: ownership, simultaneity, charging behaviour, etc.

Therefore the complexity of type B is not adequate and will strongly hinder V2G rollout.

+Each of these asset types are inherently variable in their behavior and generation characteristics: PV generation fluctuates based on the sun, wind generation on the presence of wind, CHP based on the need of heat and grid conditions, stationary storage and EV-based generation based on grid conditions and local economics (independent of other generation sources).

An AC connected storage system should not be discriminated to a DC connected storage system, which would be the case if the AC one falls over the type threshold (or other national thresholds)

	<p>storage, and mobile storage shall not be collected together for determination of the Type of the facility, as their generation patterns differ strongly and independently.</p>		
<p>Article 6</p>	<p>Application to power-generating modules, pump-storage power-generating modules, battery storage, combined heat and power facilities, and industrial sites ... 2b) Storages shall fulfil all the relevant requirements in both generation and charging operation mode. If technically capable units, eg. bidirectional cars or backup power units, do not wish to work in generation mode at a certain place, these units shall be considered as loads and do not need to fulfil all the requirements for generators in this code. 3. With respect to power-generating modules embedded in the networks of industrial sites, which includes all types of power-generating modules, power-generating facility owners, system operators of industrial sites and relevant system operators whose network is connected to the network of an industrial site shall have the right to agree on</p>	<p>It is important that electric vehicles and bidirectional chargers are allowed to be used as loads even when they have the technical capabilities to generate electricity. If this is not the case, manufacturers might not implement the capabilities to secure customers from harder installation requirements.</p> <p>This is the way the market is developing naturally and without having this provision, it will act as a regulatorily imposed market barrier.</p>	

	<p>conditions for disconnection of such power-generating modules together with critical loads, which secure production processes, from the relevant system operator's network. The exercise of this right shall be coordinated with the relevant TSO.</p>		
Article 7	<p>1. Requirements of general application to be established by relevant system operators or TSOs under this Regulation shall be subject to approval by the entity designated by the Member State and be published. These publications of national grid connection codes must be accessible by the public without registration or payment. The designated entity shall be the regulatory authority.</p> <p>+ 3(g) provide sufficient evidence and rationale to the public to justify the regulations and decisions pursuant to this Commission Regulation .</p>	<p>Law-like regulation that is imposed on citizens must be free to access by the public and companies without any barriers. The national creation processes must be done in the most transparent way with different levels of decision taking. No organisation other than the NRA should be able to create a transparent and non-discriminatory process for implementation of the European Grid codes into national requirements.</p> <p>3(g): Without providing evidence and rationale, there will not be true transparency to the market.</p>	
Article 8			
Article 9			

Article 10	<p>add: Final and intermediate versions must be published for free to the public by the NRA.</p>	<p>If national grid connection codes are behind a paywall, then we cannot really speak of a transparent process as the status quo is not possible to be read by the public.</p>	
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

The maximum file size is 1 MB

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)	<p>(a) (ii) delete all</p> <p>(b) change "by the relevant TSO to "in the last updated version of EN50549-1</p> <p>Table 2: change everytime "to be specified by TSO, but not less than..." to a specific value, which is common in the whole Union.</p>	<p>a() All requirements for type A generators should be the same throughout the EU! If not, there will be inherent bias against the use of smaller assets as DERs. This is especially true at lower power level assets.</p> <p>(at least Type A1 must be harmonised!)</p> <p>(b) Should be specified by ACER for the whole EU market area. The EN50549-1 is an adequate norm that shall be referred to in the RfG to ensure same rules for faster rollout.</p> <p>Table 2: Fast market rollout of small DER demands common values for whole EU. (counts for whole table)</p>	
Article 13(2)	<p>change "by the relevant TSO" to "specified in the last updated version of EN50549-1"</p> <p>(b) delete all</p>	<p>Fast market rollout of small DER demands common values for whole EU. (counts for whole table)</p> <p>(b) Fast market rollout of small DER demands common values for Type A in whole EU.</p>	
Article 13(3)			

Article 13(4)	4. The last updated version of EN50549-1 shall specify admissible active power reduction from maximum output with falling frequency in its control area as a rate of reduction falling within the boundaries, illustrated by the full lines in Figure 2:	Should be specified by ACER for the whole EU market area. The EN50549-1 is an adequate norm that shall be referred to in the RfG to ensure same rules for faster rollout.	
Article 13(5)			
Article 13(6)	delete completely	SOs should be creating local markets and financial incentives, not using blunt and unannounced tools to disrupt production schedules. (This is supported by the ACER demand response paper.)	
Article 13(7)	7. The last updated version of EN50549-1 shall specify the conditions under which a power-generating module is capable of connecting automatically to the network. Those conditions shall include:	Should be specified by ACER for the whole EU market area. The EN50549-1 is an adequate norm that shall be referred to in the RfG to ensure same rules for faster rollout.	

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	<p>Article 13(8) 8. Electric vehicles and charge points for electric vehicles shall be considered Type A in all cases. They shall not be assessed on a summed level. No member state shall add other requirements than this Regulation and the referred EN50549-1 standardisation to ensure free European markets for car sales.</p>	<p>Electric vehicles and charging stations as DERs belong inherently to the Type A category. Adding this language provides this clarity and avoids the situation where vehicles are required to perform testing and certification processes, as required for other types, which would present a bias against electric vehicles. As a fact that electric vehicles are by nature mobile assets, type B requirements are not economically viable, nor are they adequate or needed.</p> <p>Electric vehicles cross borders on a daily basis and should find in every member state the same grid code requirements.</p> <p>Such a solution would simplify the mass market implementation of bidirectional vehicles as this would give certainty to the manufacturers.</p>	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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)			
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	Article 14(6). Electric vehicles and charge points for electric vehicles shall be considered Type A in all cases. They shall always be assessed on the individual unit level.	Electric vehicles and charging stations as DERs belong inherently to the Type A category and shall never be summed up to Type B facilities. Adding this language provides this clarity and avoids the situation where vehicles are required to perform testing and certification processes, as required for other types, which would present a bias against electric vehicles. As a fact that electric vehicles are by nature mobile assets, type B requirements are not economically viable, nor are they adequate or needed.	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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)			
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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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)			
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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

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)			

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

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

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

The maximum file size is 1 MB

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)			

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

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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

The maximum file size is 1 MB

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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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	<p>Operational notification of type A power-generating modules</p> <p>1. The operational notification procedure for connection of each new type A power-generating module shall consist registration of the asset and the installation in a national digital tool, which each member state shall provide. The power-generating facility owner shall ensure that the required information is filled in this tool. Separate registrations shall be provided for each power-generating module within the power-generating facility. The responsible SO shall be automatically informed of the new unit and has 1 month to refuse the grid connection, otherwise the facility owner has the right to put the unit in operation. SOs need to deliver transparent reasons for refusal and an adequate timeline for an authorization. The NRA shall function as a conciliator in case of dispute.</p> <p>The relevant system operator national registration tool shall ensure that the required</p>	<p>1) In some MS multiple SO use different processes for asset registrations. This hinders competitive markets and increases</p>	

Article 30

information can be submitted by third parties on behalf of the power-generating facility owner. All information exchange between the SO and the facility owner or submitted third party shall be performed over the tool.

2. The NRA shall specify the content of the registration tool, which shall have at least the following information:

- (a) the location at which the connection is made;
- (b) the date of the connection;
- (c) the maximum capacity of the installation in kW;
- (d) the type of primary energy source;
- (e) the classification of the power-generating module as an emerging technology according to Title VI of this Regulation;
- (f) reference to equipment certificates issued by an authorised certifier used for relevant power-generating equipment that is in the site installation;
- (g) as regards equipment used, for which an equipment certificate has not been received, information shall be provided as directed by the relevant system operator; and

the costs of the energy transition due to unnecessary bureaucracy. In addition, a default "yes" and exceptional, but well documented "no" shall be preferred over long authorisation processes for small assets which in the end receive in 99% of cases the final authorisation anyway.

Paper documents and Email communication hinder fast and transparent decision making.

2) (h) The EU wants to scale up installations and therefore must ensure fast and customer friendly registration processes.

Link to the demand response code. If ACER does a good job, both codes could be combined in the same digital tools. Most of the individual asset information needed for prequalification are already existing at the moment of grid connection. Once a specific asset is prequalified, they are all in the same tool.

Aggregators can ask for permission of the final user in the same tool.

3) No communication with the individual SO is needed.

	<p>(h) the contact details of the power-generating facility owner and the installer and their signatures.</p> <p>Certified assets and all its properties shall be prefilled with all necessary documentation to ensure user friendly usability and speed.</p> <p>The NRA shall ensure that the same tool can be used for prequalification processes for flexibility markets of these assets.</p> <p>3. The power-generating facility owner shall ensure to change the status in the national tool in case of a permanent decommissioning of a power-generating module.</p> <p>The national registration tool shall ensure that such notification can be made by third parties, including aggregators.</p>		
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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

TITLE IV - Compliance

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

	Amendment proposal	Reasoning	Relation to other provisions
Article 40	<p>Responsibility of the power-generating facility owner</p> <p>1. The power-generating facility owner shall ensure that each power-generating module complies with the requirements applicable under this Regulation throughout the lifetime of the facility. For type A power-generating modules, the power-generating facility owner may rely upon equipment certificates, issued as per Regulation (EC) No 765/2008. All type A1 and especially bidirectional electric vehicle manufacturer shall be allowed to self-declare European grid code and EN50549-1 conformity through a unified european CE declaration process. Member states shall be prohibited to request further certification for Type A1 generation units.</p> <p>2. The power-generating facility owner shall notify to the relevant system operator any planned modification of the technical capabilities of a power-generating module which may affect its compliance with the requirements applicable under this Regulation,</p>	<p>CE certification processes are standard in the industry and this should be used as well for grid code compliance.</p> <p>It is crucial that only declaration is needed for the whole European union as specific processes per country would slow down or even completely stop bidirectional charging implementation as risk perceived too high by manufacturers.</p>	article 30

	before initiating that modification. This communication shall only be done in the national registration tool (article 30).		
Article 41			
Article 42	Common provisions for compliance testing for type B, C, D	Type A units shall not be asked to perform tests on site. Testing can be performed only during necessary certification processes.	
Article 43	Common provisions on compliance simulation for Type B, C, D	Type A units shall not be asked to perform tests on site. Testing can be performed only during necessary certification processes.	
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			

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

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

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

The maximum file size is 1 MB

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

The maximum file size is 1 MB

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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

FILE UPLOAD

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

The maximum file size is 1 MB

d1fb7405-562a-4c7c-b73c-22a0d953a78b/NC_RfG_commented_Volkswagen_Group.docx

Contact

[Contact Form](#)

