

Volvo Cars' submission to ACER's Public Consultation on the amendments to the grid connection network codes

Volvo Cars very much welcomes the revision of the Network Code on Requirements for Grid Connection of Generators.

Our company agrees with ACER's assessment that a revision of the code is needed to adapt the system to emerging trends such as the increasing number of electrical charging points for e-vehicles but also to enable new Battery Electric Vehicle (BEV) functionalities such as bi-directional charging.

To meet the EU's goals in term of decarbonization, many sectors – including transport and mobility – are looking at electrification. The foreseen increased demand for electricity is likely to lead to a significant strain on the grid. At Volvo Cars, we believe that with bi-directional charging – combined with smart charging – electric cars have the potential to contribute to an easing of this strain.

For example, when plugged-in BEVs could take in more energy during times when there is a surplus of renewable energy and sell it back during peak usage hours when there is more demand. Apart from helping to balance the grid, this functionality could also increase the overall sustainability of the grid by reducing potential energy waste from renewable sources at times when production outperforms demand.

While our latest BEV is hardware ready for bi-directional charging, the current regulatory framework does not allow a seamless deployment of the bi-directional function across the EU.

The revision of the code is a 'not to be missed' opportunity to facilitate the development and deployment of such capacities.

We urge the regulators to:

- **Separate the requirements for grid connection in the vehicle-to-grid (V2G) operation mode on electric vehicle (EV) and those for electric vehicle supply equipment (EVSE).**

This will enable and promote the integration of EVs as generator with different bi-directional EVSEs, and vice versa.

We are fully aware that a modification of the Code is not sufficient and that separate requirements will necessitate new engineering standardization in this area. However, Volvo Cars strongly believes that clarification in the regulations on the grid code requirements for EVs and EVSEs would bring added-value and help support innovation and competition in V2G services.

Without separate requirements, each combination of EV and EVSE would need to be tested and certified together to ensure grid code compliance. This would be a cumbersome process discouraging the development of V2G applications.

V O L V O

- **Ensure the implementation of a harmonised set of requirements for generators across all EU countries.**

Despite EU regulation 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators, the requirements for generators still differ among EU countries. This hampers our ability to deploy bi-directional charging services in more countries and thereby limit the benefits for the consumers and eco-system.

Contact persons:

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