

# ACER draft amendments to the Network Code on Requirements for Generators

Fields marked with \* are mandatory.

## Introduction

This consultation aims to present ACER's draft 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 draft amendments concerning Network Code on Demand Connection ('NC DC'), please go to the respective form: [NC DC](#).

**Responses to this consultation should be submitted by 25 September 2023.**

## Background

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 aimed to transparently indicate to stakeholders the key policy areas in which amendments were to be expected.

[Access the ACER Policy Paper on the revision of the NC RfG and NC DC.](#)

As a next step, ACER launched the Public Consultation to gather stakeholders' views and concrete amendment proposals regarding the GC NCs. The stakeholders could submit their inputs by 21 November 2022.

[Access the results of the Public Consultation on the amendments to the grid connection network codes.](#)

Additionally, in the preparation of the draft amendment proposals, ACER organised three dedicated public workshops, namely:

- [electromobility, power-to-gas demand units and heat-pumps](#) (held on 17 April 2023);
- [rate of change of frequency and grid forming capabilities](#) (held on 10 May 2023); and
- [electricity storage](#) (held on 11 May 2023).

After the evaluation of stakeholders' inputs, ACER has formulated its own proposal for the amendments of the GC NCs which is subject to this public consultation.

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## Stakeholder's details

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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:

Avere-France and ATEE

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

France

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\* 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:

Professional associations

\* 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)

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## Instructions

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Stakeholders are invited to submit their comments to the NC RfG articles amended by ACER in three mandatory steps:

1. by downloading the ACER draft amendments in the Word file provided below. The file can also be accessed on the right panel of the consultation form under the Background Documents;
2. by commenting on the ACER's draft amendments through this online consultation form and adding their alternative text proposals to the table, if any; and
3. by uploading the alternative amendment proposals to the **entire NC RfG** using the Track Changes mode in the ACER draft amendments file downloaded from **Step 1**.

Where the stakeholder does not have any comments regarding the amendments, the relevant cells in the consultation form can be left blank.

The mandatory steps for submitting the comments are listed below.

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### ***Step 1***

Please see ACER's draft amendments in the Word file provided below. The file can also be accessed on the right panel of the consultation form under the Background Documents.

[Download ACER draft amendments to the NC RfG here](#)


Step 2

Kindly note that this consultation form follows the structure of the NC RfG amended legal text provided by ACER in Step 1.

The paragraph numbering in the form reflects paragraph numbers in the amended legal text. Nevertheless, stakeholders can comment on the deleted paragraphs/articles/titles, which are marked as [deleted]. New articles and titles are marked as [new].

Please use this form to comment on ACER draft amendments and/or to provide an alternative text proposal. The instructions are the following:

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below.


 Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 1	1	2
Article 3		
Article 4		
Article 4a [new]		
Article 5		
Article 6		
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		

Please write your amendment proposals, if any, in the table below.

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

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Select file to upload

1. Leave comments on the ACER draft amendment proposals.
  2. Propose (if any) alternative wording of the relevant provision, as you provided in the Word file.
  3. Provide (if any) your proposals for adding new provisions to the relevant section of the NC RfG, as you provided in the Word file.
  4. Upload figures or tables if necessary; text inputs should be provided directly in the consultation form.
- 

### ***Step 3***

Where the stakeholder would like to propose an alternative amendment to the **entire NC RfG**, please upload the Word file (**downloaded from Step 1**) containing all your alternative amendment proposals in the Track Changes mode to the next **FILE UPLOAD** section and rename it with your stakeholder's name ("ACER\_draft\_RfG\_stakeholder\_name"). You can also upload your justification documents, where applicable.

**In case the file size exceeds the 1MB limit**, which is a consultation tool limit, kindly send the document to the functional mailbox shown on the right panel of the consultation form. Please rename the file with your stakeholder's name as indicated above and send it with the subject "ACER draft RfG legal text [stakeholder name]". Note that only submissions sent within the consultation deadline will be considered.

To facilitate the process, please, make sure that the **alternative text proposals provided in this consultation form are consistent**, to the extent possible, **with those in the Word file** you are uploading, taking into account the character limitations of each cell (max 5000 characters).

## **FILE UPLOAD**

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Please upload your file here

The maximum file size is 1 MB

Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

**Kindly note that in case the file size exceeds 1MB, the file can be sent to the functional mailbox shown on the right panel of the consultation form under Contact. Please ensure that the file name and email subject are consistent with the instructions in Step 3.**

Please also upload any other document (i.e. **justifications**) below, if relevant.

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Due to the significant length of this survey:

- you have the possibility to edit your answer after submission. When clicking on "Submit" button, you will be given a Contribution ID which you can then use to access your answers and edit them, if necessary.
- 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

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Numbers in the first column correspond to the recitals of the amended version of NC RfG Whereas section, including new recitals

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
(1)		
(2)		
(3)		
(s1)		
(s2)		
(4)		
(5)		
(6)		
(7)		
(8)		
		<p>The significance of power-generating modules should be based on their size and their effect on the overall system. Synchronous machines should be classed on the machine size and include all the components of a generating facility that normally run indivisibly. An installation containing a set of synchronous machines that cannot be operated independently from each other, such as combined-cycle gas turbine installation, should be assessed on the whole capacity of that installation. Non-synchronously connected power-generating units of the same underlying technology, where they are collected together to form an economic unit and where they have a single connection point should be assessed on their aggregated capacity. Moreover, to ensure</p>

(9)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider that it is important to clarify this information to avoid any confusion in the case of multiple connections of electric vehicle supply equipment to the same grid's connection point.</p>	<p>an appropriate harmonisation or rules for mass-market products, capacities of units of different classes, for instance, photovoltaic, electricity storage, combined heat and power installations, or V2G electric vehicles, should not be aggregated for the purpose of the determination of significance Electricity storage integrated to a power-generating module, where module is either non-synchronously connected to the network or connected through power electronics, used solely for the purpose of meeting the requirements of this Regulation should be considered as part of such module while its capacity should not count towards the power-generating module capacity. [NEW SENTENCE] For clarification, the requirements are applied to both the electric vehicle and the associated electric vehicle supply equipment, not to the grid's connection point.</p>
(10)		
(**)		
(11)		
(12)		
(13)		
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(29)		
(30)		
(31)		
(32)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New recital	<p>ADD NEW RECITAL :</p> <p>This Regulation establishes new requirements for electric vehicles and associated electric vehicle supply equipment that may not be compatible with already existing equipment. Thus, those requirements should not apply to existing equipment at the entry into force of this Regulation.</p> <p>-----</p> <p>-----</p> <p>COMMENT :</p> <p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider that we want to avoid te retrofit application of the regulation on existing EVs and EVSE.</p>

## Definitions (Article 2)

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new definitions

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
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(10a)		
Article 2(11)		
Article 2(12)		
Article 2(13)		
Article 2(14)		
Article 2(15)		
Article 2(16)		
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)		
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)		
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Article 2(62)		
Article 2(63)		
Article 2(64)		
Article 2(65)		
Article 2(66)		
Article 2(67)		
Article 2(68)		
Article 2(69)		
Article 2(70)		
Article 2(71)		
Article 2(72)		
Article 2(73)		
Article 2(74)		
Article 2(75)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New definition	

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## TITLE I - General provisions

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 1		
Article 3		
Article 4		
Article 4a [new]	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We want to clarify the meaning of significant modernisation of EV and its associated EVSE.</p>	<p>ADD A NEW PARAGRAPH AT THE END OF ARTICLE 4a UNDER THE BULLET POINT 3 :</p> <p>4. A change of components/assets of an Electric Vehicle and/or its associated EVSE is not considered as significant modernisation in the following cases:</p> <ul style="list-style-type: none"> <li>• maintenance and repair activities and spare parts, whether or not those parts are purchased new at the time of their incorporation in the electric vehicle and/or associated electric vehicle supply equipment.</li> <li>• Replacement of the existing equipment by identical one.</li> <li>• Replacement of the existing equipment by new equipment of same power and compliant with the new Regulation.</li> </ul>
Article 5		
Article 6		
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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## TITLE II CHAPTER 1 - General Requirements

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### General requirements for type A power-generating modules



Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 13(1)		
Article 13(2)		
Article 13(3)		
Article 13(4)		
Article 13(5)		
Article 13(6)		
Article 13(7)		
Article 13(8)		
Article 13(9)		
Article 13(10)		
Article 13(11)		
Article 13(12)		
Article 13(13)		
Article 13(14)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**[NEW] General requirements for type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 13a(1)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>[TITLE] General requirements for new type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment</p> <p>[PARAGRAPH ONE]</p> <p>1. New type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the following requirements relating to frequency stability:</p> <p>(a) With regard to frequency ranges, new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of remaining connected to the network and operate within the frequency ranges and time periods specified in Table XY;</p> <p>(b) With regard to the rate-of-change-of-frequency withstand capability:</p> <p>(i) A new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of staying connected to the network and operate at rates-of-change-of-frequency up to the following values:</p> <ul style="list-style-type: none"> <li>• <math>\pm 4,0</math> Hz/s over a period of 0,25 s</li> <li>• <math>\pm 2,0</math> Hz/s over a period of 0,5 s</li> <li>• <math>\pm 1,5</math> Hz/s over a period of 1 s</li> <li>• <math>\pm 1,25</math> Hz/s over a period of 2 s</li> </ul> <p>(ii) Without prejudice to paragraph (1)(a), new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of staying connected</p>

		<p>to the network and operate at the sequence of rates-of-change-of-frequencies which are defined considering the overfrequency against time profiles given in figure XX.a and the underfrequency against time profiles given in figure XX.b;</p> <p>(iii) If the rate-of-change-of-frequency is used for loss of mains protection, the rate-of-change-of-frequency threshold shall be set at higher values than the ones defined in point;</p> <p>(c) The protection schemes shall not jeopardise frequency-ride-through performance specified in paragraph (b).</p>
Article 13a(2)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider that this requirement (i.e cyber protected data exchange interface) is not relevant to EV1 which is under sized and not economically viable for active power regulation. We can consider deploying only an ON/OFF i.e logic port - functionality for EV1.</p> <p>For EV2, we consider that the data exchange interface should be developed under the requirements of the existing and coming international standards and regulations (e.g. IEC 63110).</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>2. A new type EV2 V2G electric vehicle supply equipment shall be equipped with a cyber-protected data exchange interface, consistent with existing standards and regulations, in order to modulate, without undue delay, active power output and input following an instruction being received at the input port. The relevant system operator shall have the right to specify requirements for equipment to make this facility operable remotely.</p>

Article 13a(3)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider that the minimum observation time for the EV connection to the electric vehicle supply equipment is not needed. Indeed, if the electric vehicle supply equipment is connected to the grid, it means that the required technical conditions for the EV connection are satisfied.</p> <p>Our concern is to avoid any additional delay for the customer between the EV-EVSE connection and the charging process.</p> <p>So we propose that this 5s observation time only apply when we connect the EVSE to the grid (1st installation or restart) not when connecting the EV to the EVSE to start a charging session.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>3. A new type EV1 and EV2 V2G electric vehicle associated V2G electric vehicle supply equipment may autonomously connect to the network under the following conditions:</p> <p>(a) Frequency range <math>49.8 \text{ Hz} \leq f \leq 50.2 \text{ Hz}</math>;</p> <p>(b) Minimum observation time: 5 s.</p>
Article 13a(4)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>4. A new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment may autonomously reconnect to the network after tripping due to a system disturbance under the following conditions:</p> <p>(a) Frequency range <math>49.8 \text{ Hz} \leq f \leq 50.2 \text{ Hz}</math>;</p> <p>(b) Minimum observation time: 60 s.</p>

<p>Article 13a(5)</p>	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>COMMENT FOR ALL THE ARTICLE</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p> <p>COMMENT FOR PARAGRAPH 5(a)</p> <p>We consider that this requirement is not relevant to EV1 which is under sized and not economically viable for active power regulation.</p> <p>COMMENT FOR PARAGRAPH 5(d)</p> <p>We consider that this requirement is not relevant to EV1 which is under sized and not economically viable for active power regulation.</p> <p>COMMENT FOR PARAGRAPH 5(e)</p> <p>We consider that the 1 pu of Pmax is not clearly defined and the requirement is not understandable.</p> <p>In addition, the requirement is not symmetrical if we compare LFSM-U (0.5 s for 1 pu of P max) and LFSM-O (2 s for 50 % of P max).</p>	<p>5. With regard to the limited frequency sensitive mode – underfrequency (LFSM-U-EV):</p> <p>(a) A new type EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of activating the provision of active power frequency response from the current active power input/output automatically up to the maximum capacity according to the indicative Figure YY at a frequency threshold and with the droop setting;</p> <p>(b) The droop setting shall be 5%;</p> <p>(c) The frequency threshold <math>\Delta f_1</math> shall be 49,8 Hz inclusive, except for synchronous area IE where the frequency threshold shall be 49,5 Hz inclusive;</p> <p>(d) A new type EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall stay and operate stably in this specific mode as long as the frequency is below the frequency threshold and according to its content of energy. If the frequency recovers, the V2G electric vehicle and associated V2G electric vehicle supply equipment shall follow the same power-frequency characteristic until it is back to its prior state of active power input/output;</p> <p>(e) The response time, <math>T_{resp}</math> in Figure XX, shall be less or equal to 0,5 s for an active power setpoint change of 1 pu of Pmax excluding the time for switching from consumption to generation or vice versa;</p> <p>(f) Switching from consumption to generation and vice versa should be as fast as technically feasible.</p>
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Article 13a(6)

This amendment is proposed by the working group Avere-France and ATEE.

COMMENT FOR ALL THE ARTICLE

We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.

Also, We consider that this requirement is not relevant to EV1 which is under sized and not economically viable for active power regulation.

COMMENT FOR PARAGRAPH 5(f)

The requirement is not symmetrical if we compare LFSM-U (0.5 s for 1 pu of P max) and LFSM-O (2 s for 50 % of P max).

We should also consider to add the same requirement on switching :

Switching from consumption to generation and vice versa should be as fast as technically feasible

6. With regard to limited frequency sensitive mode – overfrequency (LFSM-O-EV):

(a) A new type EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment which is consuming active power during an overfrequency event shall increase the level of active power consumed according to the LFSM-O characteristic, to the extent that is technically feasible. The type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall consume power up to filling the maximum energy that it is able to store, then it may cease consumption.

(b) A new type EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment, which is injecting active power during an overfrequency event, shall activate the provision of active power frequency response according to Figure 1X at the frequency threshold  $\Delta f1$  equal to 50,2 Hz (inclusive), except for synchronous area IE where  $\Delta f1$  shall be 50,5 Hz (inclusive);

(c) The droop setting shall be 5%;

(d) Any unintentional delay shall be as short as possible;

(e) The new type EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of operating stably during LFSM-O operation. When LFSM-O is active, the LFSM-O setpoint will prevail over any other active power setpoints which would result in an increase of power above the LFSM-O setpoint;

(f) The response time  $T_{resp}$  (Figure XX) for

		active power decrease in case of increasing frequency, shall be as fast a technically feasible and less or equal to 2 seconds for an active power setpoint change of 50% maximum power.
Article 13a(7)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>7. A new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of maintaining constant output at its target active power value regardless of changes in frequency, except where output follows the changes specified in the context of paragraphs 2 and 4 of this Article.</p>
Article 13a(8)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>8. With regard to voltage stability, a new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall be capable of staying connected to the network and operate continuously within the range of 0,85 pu - 1,1 pu at the connection point. Beyond these voltage range values, the under voltage ride through immunity limits as specified in paragraph 10 apply.</p>



Article 13a(9)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>9. A new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment, when operating above the minimum stable operating level, shall be capable of staying connected to the network and continuing to operate stably after the power system has been disturbed by faults in the transmission network according to a voltage-against-time-profile in line with Figure 3 at the connection point and with the set points in Tables X.1.1 and X.1.2.</p> <p>[CHANGE TITLE OF TABLE x.1.1] Voltage parameters for Figure 3 for fault-ride-through capability of new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment</p> <p>[CHANGE TITLE OF TABLE X.1.2] Time parameters for Figure 3 for fault-ride-through capability of new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment</p>
Article 13a(10)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>10. The voltage-against-time-profile expresses a lower limit of the profile of the phase-to-phase voltages (or single phase to neutral voltages for single phase new type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment) on the network voltage level during a symmetrical fault, as a function of time before, during and after the fault.</p>

Article 13a(11)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV1 - type EV2 to be aligned with the article 30a.</p>	<p>11. When the network voltage resumes, after the fault has been cleared, to a value within the voltage range of 0,85 pu – 1,1 pu, a new type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment shall recover its active power output level to its pre-fault value. The recovery time shall not exceed a maximum of 1s.</p>
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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**General requirements for type B power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 14(1)		
Article 14(2)[deleted]		
Article 14(2)		
Article 14(3)		
Article 14(4)		
Article 14(5)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**[NEW] Requirements for type EV3 electric vehicles and associated V2G electric vehicle supply equipment and V2G electrical charging parks**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 14a(1)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV3 to be aligned with the article 30b.</p>	<p>[TITLE]Requirements for new type EV3 electric vehicles and associated V2G electric vehicle supply equipment and V2G electrical charging parks</p> <p>CHANGEMENT IN ARTICLE 1</p> <p>1. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the requirements set out in Article 13a for new type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment, except for Article 13a (9) and 13a(10).</p>
		<p>2. A new type EV3 electric vehicle and associated V2G electric vehicle supply equipment shall fulfil the following requirements relating to voltage stability:</p> <p>a) With regard to voltage stability, a new type EV3 electric vehicle and associated V2G electric vehicle supply equipment shall be capable of staying connected to the network and operate continuously within the range of 0,9 pu - 1,1 pu at the connection point should that be above 400V and below 110 kV. Beyond these voltage range values, the under and over voltage ride through immunity limits, as specified in Article 14 (3)(a) and (c) apply;</p> <p>b) With regard to voltage ranges of 110 kV and above:</p>

Article 14a(2)

This amendment is proposed by the working group Avere-France and ATEE.

We are considering adding "new" before type EV3 to be aligned with the article 30b.

- (i) unless otherwise provided in this Regulation, a new type EV3 electric vehicle and associated V2G electric vehicle supply equipment shall be capable of staying connected to the network and operating within the ranges of the network voltage at the connection point, expressed by the voltage at the connection point related to the reference 1 pu voltage, and for the time periods specified in Tables XX.1 and XX.2 or, for rated voltages not included in the tables and above voltage level 110 kV as specified by the relevant system operator in coordination with the relevant TSO;
- (ii) the relevant TSO may specify shorter periods of time during which type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall be capable of remaining connected to the network in the event of simultaneous overvoltage and underfrequency or simultaneous undervoltage and overfrequency;
- (iii) notwithstanding the provisions of paragraph (i), the relevant TSO in Spain may require type EV3 electric vehicles and associated V2G electric vehicle supply equipment to be capable of remaining connected to the network in the voltage range between 1,05 pu and 1,0875 pu for an unlimited period;
- (iv) for the 400 kV grid voltage level (or alternatively commonly referred to as 380 kV level), the reference 1 pu value is 400 kV; for other grid voltage levels, the reference 1 pu voltage may differ for each system operator in the same synchronous area;

		<p>(v) the relevant TSOs in the Baltic synchronous area may require type EV3 electric vehicles and associated V2G electric vehicle supply equipment to remain connected to the 400 kV network in the voltage range limits and for the time periods that apply in the Continental Europe synchronous area;</p> <p>(vi) the relevant system operator, in coordination with the relevant TSO, and the electrical charging park owner may agree on wider voltage ranges or longer minimum time periods for operation to ensure the best use of the technical capabilities of new type EV3 electric vehicles and associated V2G electric vehicle supply equipment, if it is required to preserve or to restore system security.</p> <p>The electrical charging park owner shall not unreasonably withhold consent to apply wider voltage ranges or longer minimum times for operation, taking account of their economic and technical feasibility;</p>
		<p>3. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the following requirements in relation to robustness:</p> <p>(a) with regard to fault-ride-through capability:</p> <p>(i) each TSO shall specify a voltage-against-time-profile in line with Figure 3 at the connection point for fault conditions, which describes the conditions in which a new type EV3 electric vehicle and associated V2G electric vehicle supply equipment, when operating</p>



above the minimum stable operating level, is capable of staying connected to the network and continuing to operate stably after the power system has been disturbed by secured faults on the transmission system;

(ii) the voltage-against-time-profile shall express a lower limit of the actual course of the phase-to-phase voltages on the network voltage level at the connection point during a symmetrical fault, as a function of time before, during and after the fault;

(iii) the lower limit referred to in point (ii) shall be specified by the relevant TSO, in co-ordination with the relevant system operator, using the parameters set out in Figure 3, and within the ranges set out in Tables 3.1.1, 3.1.2, 3.2.1 and 3.2.2;

(iv) each TSO, in co-ordination with the relevant system operator, shall specify and make publicly available the pre-fault and post-fault conditions for the fault-ride-through capability in terms of:

- the calculation of the pre-fault minimum short circuit capacity at the connection point,
- pre-fault active and reactive power operating point of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment at the connection point and voltage at the connection point, and
- calculation of the post-fault minimum short circuit capacity at the connection point;

(v) at the request of an electrical charging park owner, the relevant system operator shall

Article 14a(3)

This amendment is proposed by the working group Avere-France and ATEE.

We are considering adding "new" before type EV3 to be aligned with the article 30b.

provide the pre-fault and post-fault conditions to be considered for fault-ride-through capability as an outcome of the calculations at the connection point as specified in point (iv) regarding:

- pre-fault minimum short circuit capacity at each connection point expressed in MVA,
- pre-fault operating point of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment expressed as active power output and reactive power output at the connection point and voltage at the connection point, and
- post-fault minimum short circuit capacity at each connection point expressed in MVA.

Alternatively, the relevant system operator may provide generic values derived from typical cases;

Table 3.2.1

Voltage parameters for Figure 3 for fault-ride-through capability of new type EV3 electric vehicles and associated V2G electric vehicle supply equipment

Voltage parameters (pu)

Uret: 0,05-0,15

Uclear: Uret-0,15

Urec1: Uclear

Urec2: Minimum voltage specified in paragraph (2)

Table 3.2.2

Time parameters for Figure 3 for fault-ride-through capability of new type EV3 electric vehicles and associated V2G electric vehicle supply equipment

Time parameters (seconds)

tclear: 0,14-0,15 (or 0,14-0,25 if justified by the system protection and secure operation needs)

trec1: tclear

trec2: trec1

trec3: 1,5-3,0

(vi) the new type EV3 electric vehicle and associated V2G electric vehicle supply equipment shall be capable of remaining connected to the network and continuing to operate stably when the actual course of the phase-to-phase voltages on the network voltage level at the connection point during a symmetrical fault, given the pre-fault and post-fault conditions in points (iv) and (v) of paragraph 3(a), remain above the lower limit specified in point (ii) of paragraph 3(a), unless the protection scheme for internal electrical faults requires the disconnection of the new type EV3 electric vehicle and associated V2G electric vehicle supply equipment from the network. The protection schemes and settings for internal electrical faults must not jeopardise fault-ride-through capabilities of a new type EV3 electric vehicle and associated V2G electric vehicle supply equipment, in line with the requirements set out in this Regulation;

(vii) without prejudice to point (vi) of paragraph 3(a), undervoltage protection (either fault-ride-through capability or minimum voltage specified at the connection point voltage) shall be set by the electrical charging park owner

		<p>according to the widest possible technical capability of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment, unless the relevant system operator requires narrower settings in accordance with point (b) of paragraph 5. The settings shall be justified by the electrical charging park owner in accordance with this principle;</p> <p>(b) fault-ride-through capabilities in case of asymmetrical faults shall be specified by each TSO.</p>
Article 14a(4)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We are considering adding "new" before type EV3 to be aligned with the article 30b.</p>	<p>4. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the following requirements relating to system restoration:</p> <p>(a) the relevant TSO shall specify the conditions under which a type EV3 electric vehicle and associated V2G electric vehicle supply equipment is capable of reconnecting to the network after an incidental disconnection caused by a network disturbance; and</p> <p>(b) installation of automatic reconnection systems shall be subject both to prior authorisation by the relevant system operator and to the reconnection conditions specified by the relevant TSO.</p>
		<p>5. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the following general system management requirements:</p> <p>(a) with regard to control schemes and</p>

settings:

(i) the schemes and settings of the different control devices of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment that are necessary for transmission system stability and for taking emergency action shall be coordinated and agreed between the relevant TSO, the relevant system operator and the electrical charging park owner;

(ii) any changes to the schemes and settings, mentioned in point (i), of the different control devices of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall be coordinated and agreed between the relevant TSO, the relevant system operator and the electrical charging park owner, in particular if they apply in the circumstances referred to in point (i) of paragraph 5(a);

(b) with regard to electrical protection schemes and settings:

(i) the relevant system operator shall specify the schemes and settings necessary to protect the network, taking into account the characteristics of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment. The protection schemes needed for the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment and the network as well as the settings relevant to the new type EV3 electric vehicles and associated V2G electric vehicle

Article 14a(5)

This amendment is proposed by the working group Avere-France and ATEE.

We are considering adding "new" before type EV3 to be aligned with the article 30b.

#### COMMENT FOR ARTICLE 5.d

The information exchange should be applied on the electrical cabinet and should not impact individual electric vehicle supply equipment of EV charging park.

supply equipment shall be coordinated and agreed between the relevant system operator and the electrical charging park owner. The protection schemes and settings for internal electrical faults must not jeopardise the technical capabilities of a new type EV3 electric vehicles and associated V2G electric vehicle supply equipment, in line with the requirements set out in this Regulation;

(ii) electrical protection of the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall take precedence over operational controls, taking into account the security of the system and the health and safety of staff and of the public, as well as mitigating any damage to the new EV3 electric vehicles and associated V2G electric vehicle supply equipment;

(iii) protection schemes may cover the following aspects:

- external and internal short circuit,
- asymmetric load (negative phase sequence),
- over-/underexcitation,
- over-/undervoltage at the connection point,
- over-/undervoltage at the alternator terminals,
- inter-area oscillations,
- inrush current,
- asynchronous operation,
- line protection,
- transformer protection, — back-up against protection and switchgear malfunction,

- overfluxing (U/f),
- rate of change of frequency, and
- neutral voltage displacement.

(iv) changes to the protection schemes needed for the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment and the network and to the settings relevant to the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall be agreed between the system operator and the electrical charging park owner, and agreement shall be reached before any changes are made;

(c) the electrical charging park owner shall organise its protection and control devices in accordance with the following priority ranking (from highest to lowest):

- (i) network and EV3 electric vehicles and associated V2G electric vehicle supply equipment protection;
- (ii) synthetic inertia, if applicable;
- (iii) frequency control (active power adjustment);

(iv) power restriction; and

(v) power gradient constraint;

(d) with regard to information exchange:

(i) V2G electrical charging parks shall be capable of exchanging information with the relevant system operator or the relevant TSO in real time, as specified by the relevant system operator or the relevant TSO. The content of real-time data shall be consistent with the data

		<p>exchange requirements laid down in Title 2 of Regulation (EU) 2017/1485;</p> <p>(ii) V2G electrical charging parks shall be capable of exchanging real time data for metering with the relevant system operator or the relevant TSO;</p> <p>(iii) if required by the relevant system operator the V2G electrical charging park shall be able capable to provide fault recording for the following parameters:</p> <ul style="list-style-type: none"> <li>— voltage,</li> <li>— active power,</li> <li>— reactive power, and</li> <li>— frequency;</li> </ul> <p>(iv) the settings of the fault recording equipment, including triggering criteria and the sampling rates shall be agreed between the electrical charging park owner and the relevant system operator in coordination with the relevant TSO;</p> <p>(v) the facilities for quality of supply and dynamic system behaviour monitoring shall include arrangements for the electrical charging park owner, and the relevant system operator and the relevant TSO to access the information. The communications protocols for recorded data shall be agreed between the electrical charging park owner, the relevant system operator and the relevant TSO.</p>
		<p>6. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall fulfil the following additional requirements in relation to voltage stability:</p>



Article 14a(6)

This amendment is proposed by the working group Avere-France and ATEE.

We are considering adding "new" before type EV3 to be aligned with the article 30b.

We insist on the fact that these requirements are applicable on EV3 and not several connected EV2.

(a) with regard to reactive power capability, the relevant system operator shall have the right to specify the capability of a new type EV3 electric vehicles and associated V2G electric vehicle supply equipment to supply and absorb reactive power;

(b) the relevant system operator in coordination with the relevant TSO shall have the right to specify that a new type EV3 electric vehicles and associated V2G electric vehicle supply equipment be capable of providing fast fault current at the connection point in case of symmetrical (3-phase) faults, regarding the following:

(i) the new type EV3 electric vehicles and associated V2G electric vehicle supply equipment shall be capable of activating the supply of fast fault current either by:

— ensuring the supply of the fast fault current at the connection point, or

— measuring voltage deviations at the terminals of the individual new type EV3 electric vehicle and associated V2G electric vehicle supply equipment and providing a fast fault current at their terminals;

(ii) the relevant system operator in coordination with the relevant TSO shall specify:

— how and when a voltage deviation is to be determined as well as the end of the voltage deviation,

— the characteristics of the fast fault current, including the time domain for measuring the voltage deviation and fast fault current, for

		<p>which current and voltage may be measured differently from the method specified in Article 2, — the timing and accuracy of the fast fault current, which may include several stages during a fault and after its clearance;</p> <p>(c) with regard to the supply of fast fault current in case of asymmetrical (1-phase or 2-phase) faults, the relevant system operator in coordination with the relevant TSO shall have the right to specify a requirement for asymmetrical current injection.</p>
Article 14a(7)	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>Grid forming should be defined in order to better understand the requirement indicated here.</p>	<p>7. New type EV3 electric vehicles and associated V2G electric vehicle supply equipment as listed in Article Y.</p>
Article 14a(8)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

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**General requirements for type C power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 15(1)		
Article 15(2)		
Article 15(3)[deleted]		
Article 15(3)		
Article 15(4)		
Article 15(5)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**General requirements for type D power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 16(1)		
Article 16(2)		
Article 16(3)		
Article 16(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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

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**[NEW]** Requirements for type A synchronous power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article X		



Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type B synchronous power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 17(1)		
Article 17(2)		
Article 17(3)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type C synchronous power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 18(1)		
Article 18(2)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type D synchronous power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 19(1)		
Article 19(2)		
Article 19(3)		
Article 19(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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## TITLE II CHAPTER 3 - Requirements for power park modules

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**[NEW]** Requirements for type A power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article Y(1)		
Article Y(2)		
Article Y(3)		
Article Y(4)		
Article Y(5)		
Article Y(6)		
Article Y(7)		
Article Y(8)		



Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type B power park modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 20(1)		
Article 20(2)		
Article 20(3)		
Article 20(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type C power park modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 21(1)		
Article 21(2) [deleted]		
Article 21(2)		
Article 21(3)		
Article 21(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**Requirements for type D power park modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 22(1)		
Article 22(2)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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## TITLE II CHAPTER 4 - Requirements for offshore power park modules

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 23		
Article 24		
Article 25		
Article 26		
Article 27		
Article 28		



Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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### TITLE III - Operational notification procedure for connection

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 29		
Article 30		
Article 30a [new]	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider adding "new" before type EV2 in order to be aligned with the scope of the following text.</p>	<p>[CHANGE TITLE]</p> <p>Procedure for new type EV2 associated V2G electric vehicle supply equipment</p>
Article 30b [new]	<p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider adding "new" before type EV3 in order to be aligned with the scope of the following text.</p> <p>COMMENT FOR PARAGRAPH 3</p> <p>This amendment is proposed by the working group Avere-France and ATEE.</p> <p>We consider that the final operational should be notified within an acceptable delay.</p>	<p>[CHANGE TITLE]</p> <p>Procedure for new type EV3 associated V2G electric vehicle supply equipment</p>
Article 31		
Article 32		
Article 33		
Article 34		
Article 35		
Article 36		

Article 37		
Article 38		
Article 39		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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## TITLE IV - Compliance

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
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 proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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## TITLE V - Derogations

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 60		
Article 61		
Article 62		
Article 63		
Article 64		
Article 65		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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**[DELETED] TITLE VI - Transitional arrangements for emerging technologies**

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	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Title VI [deleted]		



Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 70a [new]		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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## TITLE VII - Final provisions

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Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 71		
Article 71a [new]		
Article 72		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

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## Other additional provisions

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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
Other new provisions	

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## Background Documents

[NC\\_RfG\\_ACER\\_draft\\_amendments\\_for\\_PC\\_2023\\_E\\_07.docx](#)

## Contact

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