

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**').

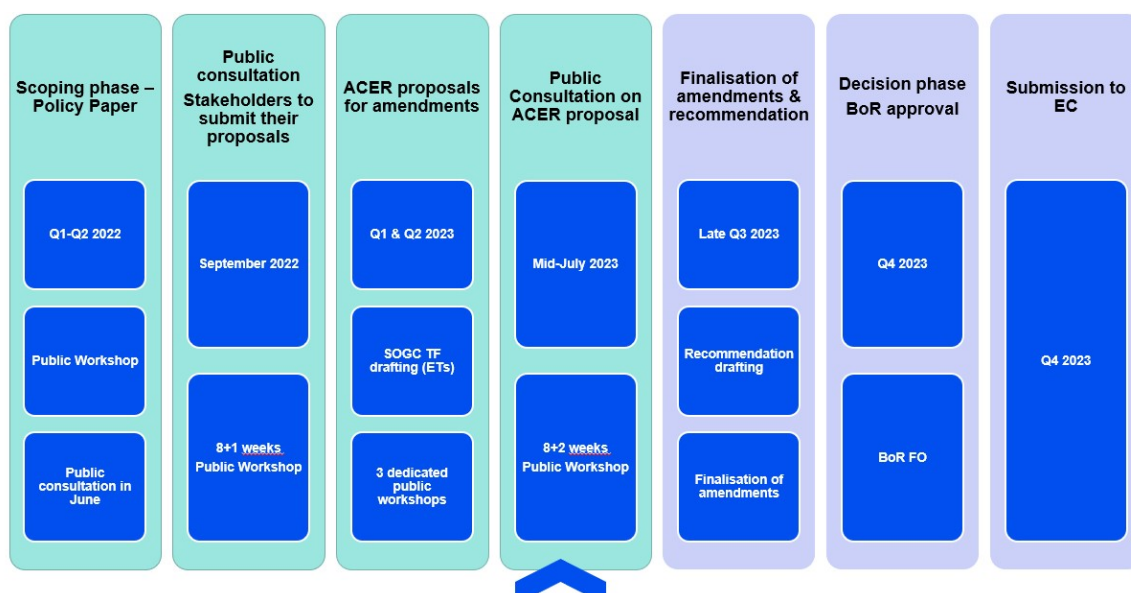
For draft amendments concerning Network Code on Demand Connection ('NC DC'), please go to the respective form: [NC DC](#).

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.

Stakeholder's details

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:

BDEW e.V.

* 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:

Association representing the whole value chain in the electricity market: generation, transmission, distribution, wholesale and retail

* 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)

Instructions

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.

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)	3
New article		

Please upload figures or tables if necessary

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Select file to upload

4

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

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.

Please upload your file

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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.

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)		
(9)	The combination of non-synchronous power generating modules and storage facilities of different technologies at the same connection point should be explicitly allowed.	(9) ... 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 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, may not be aggregated for the purpose of the determination of significance. To ensure cost effective RES integration to support achieving the EU RES targets on time, power generation facility owners are entitled to aggregate non-synchronously connected power-generating units and electricity

		storage of different underlying technology, where they are collected together to form an economic unit and where they have a single connection point which should be assessed on maximum capacity. 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.
(10)		
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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New recital	

Definitions (Article 2)

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)		
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Article 2(30)		
Article 2(31)		
Article 2(32)		
Article 2(33)		
Article 2(34)		
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Article 2(36)		
Article 2(37)		
Article 2(38)		
Article 2(39)		
Article 2(40)		
Article 2(41)		
Article 2(42)		
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Article 2(60)		
Article 2(61)		
Article 2(62)		
Article 2(63)		
Article 2(64)		
Article 2(65)		
Article 2(66)		
Article 2(67)	It should be clarified that V2G EVs and Electric Vehicle Supply Equipment (EVSE) don't have to fulfil all requirements for ESMs	'electricity storage module' or 'ESM' means a synchronous power-generating module or a power park module which can inject and consume active power to and from the network for electricity storage, excluding pump-storage power-generating modules. A V2G electric vehicle and associated V2G electric vehicle supply equipment with a bidirectional functionality is regarded as an electricity storage module but is faced with separate requirements and connection procedures;
Article 2(68)		
Article 2(69)		
Article 2(70)	In the text proposal no distinction is made between AC and DC V2G, which means that cars and charging points are often mixed up. It would be helpful if the two variants were	'V2G electric vehicle' means the vehicle that is powered, fully or in part, with electricity and is equipped with technology enabling the vehicle to provide electricity to the grid, no matter whether

	described once, and if it was clearly stated that both are meant.	the V2G electric vehicles contains the inverter (AC V2G) or not (DC V2G).
Article 2(71)		
Article 2(72)	In the text proposal no distinction is made between AC and DC V2G, which means that cars and charging points are often mixed up. It would be helpful if the two variants were described once, and if it was clearly stated that both are meant.	'V2G electric vehicle supply equipment' means the infrastructure necessary to conduct electrical energy safely from the electricity supply grid to the electric vehicle and from the electric vehicle to the electricity supply grid with both generation and demand behaviour, no matter whether the V2G electric vehicle supply equipment contains the inverter (DC V2G) or not (AC V2G). Electrical wirings are not deemed part of an electric vehicle supply equipment.
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

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>Article 4a par. 2 lit. b: The minimum percentage of a deviation from the reactive power capability which would lead to a “significant modernisation” should be defined in the range between 10 and 20 %;</p> <p>Article 4a part. 2 lit. d: It has to be reassured that only major changes of components or assets provoke the state of “significant modernisation”</p>	<p>2. The definition of significant modernisation shall take into account at least the following criteria:</p> <p>(a) ...</p> <p>(b) a deviation from the reactive power capability of the power-generating module, whether this deviation results from one modernisation or several successive modernisations, of a minimum percentage to be defined in the range 10-20 %;</p> <p>(c) ...</p> <p>(d) a major change of components/assets of a power-generating module or electricity storage module markedly changing its electro-technical capabilities apart from maintenance and repair activities and spare parts, whether or not those parts are purchased new at the time of their incorporation in the power generating module;</p>
Article 5		
Article 6	<p>There is no need to state that V2G EVs & EVSE must fulfil the NC RfG with respect to electricity consumption. This should be part of the NC DC. The same applies to Article 13a 6a (see remarks below).</p> <p>(related to Art. 13a par. 6a)</p>	<p>Electricity storage modules and V2G electric vehicles and associated V2G electric vehicle supply equipment shall satisfy the relevant requirements of this Regulation when the electricity storage module or V2G electric vehicle and associated V2G electric vehicle supply equipment injects active power to the network.</p>

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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TITLE II CHAPTER 1 - General Requirements

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)	<p>Art. 13 par. 14 lit. b:</p> <p>The need for the provision of grid forming capability by power generating modules (PGMs) and power park modules (PPMs) in the future electricity system is unquestionable. Yet, it has to be carefully arranged how to define the group of PGMs and PPMs which are addressed by a compulsory rule to provide grid forming capability. With regards to the overall efficiency of the power system, it should be assessed whether it is adequate to introduce such a rule for all PGMs and PPMs connected to a certain grid. BDEW asks ACER to discuss this aspect</p>	

	and possible alternatives to a mandatory provision (e.g. market-based procurement) in further detail with the different stakeholder groups which would be affected by such a rule.	
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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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[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)		
Article 13a(2)	The technology must be open in this case, whether EVSE or EV drives this curve.	A V2G electric vehicle supply equipment shall be equipped with a cyber-protected data exchange interface 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. Additionally, the V2G electric vehicle can be also equipped with this interface.
Article 13a(3)		
Article 13a(4)		
Article 13a(5)	<p>Article 13a par. 5 lit. e:</p> <p>If the vehicle does neither charge nor discharge, it is in a charging pause. From this state, it also needs more time to activate</p> <p>(related to Art. 13a par. 5a)</p>	The response time, T_{resp} in Figure XX, shall be less or equal to 0,5 s for an active power setpoint change of 1 pu of P_{max} excluding the time for switching from consumption to generation or vice versa as well as the time for switching on consumption or generation;
	<p>Article 13a par. 6 lit. a:</p> <p>This paragraph describes a requirement relating to the state of electricity consumption. Therefore, it should be part of the NC DC. Or is it part of the RfG because V2G EVs and V2G EVSE is considered as an energy storage module?</p>	

Article 13a(6)	<p>Besides, the scope of this requirement is irritating: Do only V2G electric vehicles and associated V2G electric vehicle supply equipment have to fulfill these requirements? What about V1G electric vehicles and associated electric vehicle supply equipment. Proposal: Shift these requirements to NC DC.</p> <p>(related to Art. 6)</p>	<Delete Art. 13a par. 6 lit. a here and shift it to the NC DC>
Article 13a(7)		
Article 13a(8)		
Article 13a(9)		
Article 13a(10)		
Article 13a(11)		

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)		
Article 14a(2)		
Article 14a(3)		
Article 14a(4)		
Article 14a(5)	<p>Article 14a par. 5 lit. d (ii): Especially EVs might rely on Dedicated Metering Devices (DMDs) as they can be deployed much faster and might even be embedded in the charger itself. Therefore, DMDs should be allowed here.</p> <p>Article 14a par. 5 lit. d (iii):</p> <p>The title of Article 14a says: “Requirements for type EV3 electric vehicles and associated V2G electric vehicle supply equipment and V2G electrical charging parks”</p> <p>V2G electrical charging park is defined in Art. 2 No. 74 as follows: (74) ‘V2G electrical charging park’ means the installation that has a single connection point to the relevant network and where one or more V2G electric vehicles can be simultaneously connected.</p> <p>As laid down in Art. 13a, there are no requirements concerning reactive power to EV2</p>	<p>Article 14a par. 5 lit. d (ii): V2G electrical charging parks shall be capable of exchanging real time data for metering with the relevant system operator or the relevant TSO. The usage of sub-metering or dedicated metering devices (DMD) is allowed;</p> <p>Article 14a par. 5 lit. d (iii): if required by the relevant system operator the V2G electrical charging park shall be capable of providing fault recording for the following parameters:</p> <ul style="list-style-type: none"> — voltage, — active power, — reactive power (if only EV3 electric vehicles and associated V2G electric vehicle supply equipment is in the V2G electrical

	electric vehicles and associated equipment. Therefore, for the avoidance of doubt, it should be clarified in Art. 14a par. 5 (d) (iii) that the requirements with regards to reactive power do not apply in the case that EV2 electric vehicles and/or associated V2G electric vehicle supply equipment is/are connected in the V2G electrical charging park.	charging park), and — frequency;
Article 14a(6)		
Article 14a(7)		
Article 14a(8)		

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 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

[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	

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 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	

Please upload figures or tables if necessary

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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	

Please upload figures or tables if necessary

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TITLE II CHAPTER 3 - Requirements for power park modules

[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)	<p>The need for the provision of grid forming capability by power generating modules (PGMs) and power park modules (PPMs) in the future electricity system is unquestionable. Yet, it has to be carefully arranged how to define the group of PGMs and PPMs which are addressed by a compulsory rule to provide grid forming capability. With regards to the overall efficiency of the power system, it should be assessed whether it is adequate to introduce such a rule for all PGMs and PPMs connected to a certain grid. BDEW asks ACER to discuss this aspect and possible alternatives to a mandatory provision (e.g. market-based procurement) in further detail with the different stakeholder groups which would be affected by such a rule.</p>	
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	

Please upload figures or tables if necessary

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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 refer to Art. Y par. 5 regarding grid forming capability	

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

The maximum file size is 1 MB

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 refer to Art. Y par. 5 regarding grid forming capability	

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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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)	Art. 22: Please refer to Art. Y par. 5 regarding grid forming capability	
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

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

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]		
Article 30b [new]		
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

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	<p>Article 42 par. 5:</p> <p>DC V2G electric vehicles do not require compliance certification (similar to solar panels). Therefore, the requirement should be limited to AC V2Gs.</p> <p>It remains unclear what is meant by the notion 'data exchange protocol'. Does it refer to ISO 15118-20 for AC V2G? It would be good to clarify this.</p> <p>What does "associating" mean? Interoperability between different EVSE and EV should be still given!</p>	<p>Concerning V2G electric vehicle and V2G electric vehicle supply equipment, compliance shall be based on individual type-test certificates issued as per Regulation (EC) No 765/2008 regarding the V2G electric vehicle supply equipment on one side and the V2G electric vehicle homologated platform (in case of AC V2G) on the other side. A certification shall include for instance the data exchange protocol, or system performance criteria, associating the V2G electric vehicle supply equipment and the V2G electric vehicle homologated platform. The individual type-test certificates shall enable interoperability between different V2G electric vehicles and V2G electric vehicle supply equipment being associated.</p>
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

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

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)
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

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

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](#)

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