

ACER draft amendments to the Network Code on Demand Connection

Fields marked with * are mandatory.

Introduction

This consultation aims at presenting ACER's draft amendments to the **Commission Regulation (EU) 2016 /1388 of 17 August 2016 establishing a Network Code on Demand Connection ('NC DC')**.

For draft amendments concerning Network Code on Requirements for Generators ('NC RfG'), please go to the respective form: [NC RfG](#).

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:

EU DSO Entity

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Belgium

* 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:

* 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 DC articles amended by ACER in three mandatory steps:

1. by downloading the ACER draft amendments in the Word file provided below. The file could 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 DC** 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 could also be accessed on the right panel of the consultation form under the Background Documents.

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

Step 2

Kindly note that this consultation form follows the structure of the NC DC 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	3

Please upload figures or tables if necessary

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Select file to upload4

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 DC, 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 DC**, 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_DC_stakeholder_name"). You can also upload your justification documents, where applicable.

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

73d5bb2a-0c2a-4c40-9299-c7742a2fd4c2/ACER_draft_DC_EU_DSO_ENTITY.docx

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

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 DC Whereas section, including new recitals

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
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(16)		
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(18)		
(19)		
(20)		
(21)		
(22)		
(23)		
(24)		

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(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(*)		
Article 2(**)		
Article 2(***)		

Article 2(****)	<p>Additional articles added</p> <p>Point 1. ***** - 5 stars</p> <p>The EU DSO Entity believes it will be more helpful to readers of the NC RfG and NC DC for the relevant definitions to be placed in the relevant documents. Hence the definitions for V1G EVs should be placed in the NC DC. We have separately suggested that this definition is removed from the RfG.</p> <p>Point 2 ***** - 6 stars</p> <p>The EU DSO Entity believes it will be more helpful to readers of the NC RfG and NC DC for the relevant definitions to be placed in the relevant documents. Hence the definitions for V1G EVs should be placed in the NC DC. We have separately suggested that this definition is removed from the RfG.</p>	<p>Point 1.</p> <p>***** V1G electric vehicle' means the vehicle that is powered, fully or in part, with electricity and can only withdraw electricity from the grid.</p> <p>Point 2.</p> <p>***** 'V1G electric vehicle supply equipment' means the infrastructure necessary to safely conduct electrical energy from the electricity supply grid to the electric vehicle with demand-only behaviour. Electrical wiring is not deemed part of an electric vehicle supply equipment..</p>
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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New definition	

Please upload figures or tables if necessary

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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	<p>Point 1- On Art 3.1.e</p> <p>The EU DSO Entity believes that it is inappropriate to include the phrase “that do not meet the definition of electricity storage” since the V1G definition already specifically excludes this.</p> <p>Point 2- On Art. 3.2c</p> <p>The EU DSO Entity would recommend that the symbol used denoting decimals is standardized as a comma, in keeping with EU law in general.</p>	<p>Point 1.</p> <p>(e) new V1G electric vehicles and associated V1G electric vehicle supply equipment, heat-pumps and power-to-gas demand units, with maximum consumption capacity larger than 800W at any voltage level.</p> <p>Point 2.</p> <p>electricity storage modules and pump-storage power generating modules that have both generation and charging/pumping mode; demand facilities that part of other frequencies than 50 Hz and DC-current (e. g. 16,7 Hz power supply systems) that not connected on the synchronous area (e. g. static converter stations</p>
Article 4		<p>Point 1.</p> <p>1. Proposals for defining significant modernisation of transmission-connected demand facilities, transmission-connected distribution facilities, distribution systems and demand units that are or can be used by a demand facility or a closed distribution system to provide demand response services to a relevant system operator or relevant TSO and the</p>

Article 4a [new]

Point 1- on 4.a.1

The EU DSO Entity believes that it will be better for the DSO and TSO to agree these criteria – especially those related to the modernization of distribution systems.

Point 2- on 4.a.2

The sub bullets in the draft legal text are renumbered. We have corrected them.

requirements applicable in those cases shall be subject to approval by the relevant regulatory authority or, where applicable, the Member State. The TSO shall agree the proposals with the relevant DSO and conduct a public consultation in accordance with Article 9.

Point 2.

2. The definition of significant modernisation shall take into account at least the following criteria:

a) In the case of a transmission-connected demand facility and a transmission-connected distribution facility:

- i) a percentage increase above the existing maximum import or export capability;
- ii) a percentage increase in the short-circuit current contribution;
- iii) an increase in the range of reactive power exchange; or
- iv) a change of components/assets apart from maintenance and repair activities and spare parts.

(b) In the case of a distribution system (including closed distribution systems), the replacement of a percentage of the equipment comprising that distribution system.

(c) In the case of a demand unit that can be used by a demand facility or closed distribution system to provide demand response services:

- i) any change in the range of frequencies or voltages over which the demand unit can operate;
- ii) a percentage deviation from the demand response capacity notified to the relevant system

		<p>operator; or</p> <p>iii) a change of components/assets apart from maintenance and repair activities and spare parts,</p> <p>In the proposal, the TSO can propose additional criteria defining a significant modernisation.</p>
Article 5		
Article 6		
Article 7		
Article 8		
Article 9		
Article 10	<p>EU DSO Entity added into the article for the purposes of the responsibility for stakeholder engagement now being shared between ENTSO-E and the EU DSO Entity</p>	<p>ACER, in close cooperation with the European Network of Transmission System Operators for Electricity (ENTSO for Electricity) and the entity of Distribution System Operator in the Union (the EU DSO Entity), shall organise stakeholder involvement, regarding the requirements for the grid connection of transmission-connected demand facilities, transmission-connected distribution facilities, distribution systems and demand units used by a demand facility or a closed distribution system to provide demand response services to relevant system operators and relevant TSOs, and other aspects of the implementation of this Regulation. This shall include regular meetings with stakeholders to identify problems and propose improvements notably related to the requirements for grid connection of transmission-connected demand facilities, transmission-connected distribution facilities, distribution systems and demand units used by a demand facility or a closed distribution</p>

		system to provide demand response services to relevant system operators and relevant TSOs.
Article 11		

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 - Connection of transmission-connected demand facilities, transmission-connected distribution facilities and distribution systems

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 12		
Article 13		
Article 14		
Article 15	<p>On Art. 15.2</p> <p>The previous text had a clear threshold of 25%. Where this clause is invoked by the relevant TSO, the potential impact on DSO operation may be very significant. The EU DSO Entity believes that a threshold cannot therefore be unilaterally imposed on a DSO without all such implications being understood and agreed.</p>	<p>2. The relevant TSO may require that transmission-connected distribution systems have the capability at the connection point or over a set of connection points defined by the relevant TSO, and agreed with the transmission-connected distribution system operator, not to supply reactive power to the transmission system when the magnitude of the active power exchange between the transmission-connected distribution system and the transmission system is lower than a threshold defined by the relevant TSO and agreed with the transmission-connected distribution system operator.</p> <p>Where applicable, Member States may require the relevant TSO to justify the defined set of connection points and active power threshold through a joint analysis and agreement with transmission-connected distribution system operators.</p>
Article 16		
		<p>2. The agreement shall cover at least the following elements:</p> <ul style="list-style-type: none"> (a) isolated (network) operation; (b) damping of oscillations;

Article 17	The EU DSO Entity does not understand why it is necessary to limit agreement to single phase reclosing when there could be relevant aspects to agree for three phase reclosing.	<ul style="list-style-type: none"> (c) disturbances to the transmission network; (d) automatic switching to emergency supply and restoration to normal topology; (e) automatic circuit-breaker re-closure.
Article 18		
Article 19	<p>Point 1 on Art 19.1</p> <p>The EU DSO Entity agrees that the overall total tripping time is achievable for all new relays and circuit breakers. On that basis, recognizing that the DC only applies to new distribution systems, the Entity accepts the performance requirement and is proposing a simplification to the expression of these requirements, without changing the requirements overall.</p> <p>In the new proposed 19.1(c)(iii) “better” is a clearer requirement than “lower”.</p> <p>Point 2 - on Art.19.4c</p> <p>As the requirements are placed on a transmission connected parties by the TSO it would make more sense to write this is the relevant TSO rather than relevant system operator.</p>	<p>Point 1.</p> <ul style="list-style-type: none"> (i) frequency range: at least between 47-50 Hz, adjustable in steps of 0,05 Hz; (ii) maximum total tripping time: no more than 200 ms, starting from the system frequency crossing the trip setting threshold to the circuit breaker opening, including all necessary relay operating times; (iii) relay accuracy: better than 30 mHz; (iv) voltage lock-out: blocking of the functional capability shall be possible when the voltage is within a range of 30 to 90 % of reference 1 pu voltage; (v) provide the direction of active power flow at the point of disconnection; <p>Point 2</p> <ul style="list-style-type: none"> (c) if required by the relevant TSO, a transmission-connected demand facility or a transmission-connected distribution facility shall be equipped with a logic interface (input port) in order to be disconnected, eventually in block loading, from the transmission system. If the relevant TSO requires a transmission-connected

		demand facility or a transmission-connected distribution facility to be equipped with such logic interface, it shall have the right to specify requirements for the equipment to make this facility operable remotely. The relevant TSO shall specify the time required for remote disconnection.
Article 20		
Article 21		
Article 22		
Article 23		
Article 24		
Article 25	The new 25.3(c) needs some additional words to make it clear that the sub paragraph applies to transmission connected demand facilities only, and not all demand facilities.	<p>3. For the purposes of the data and study review, the transmission-connected demand facility owner or transmission-connected distribution system operator must submit the following to the relevant TSO:</p> <p>(a) an itemised statement of compliance;</p> <p>(b) an update of the applicable technical data, simulation models and studies as referred to in points (b), (d) and (e) of Article 24(3), including the use of actual measured values during testing; and</p> <p>c) for transmission connected demand facilities an update of the applicable technical data, simulation models and studies proving compliance of electric vehicles and associated V1G electric vehicle supply equipment, power-to-gas demand units and heat-pumps.</p>

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

The maximum file size is 1 MB

TITLE III - Connection of demand units used by a demand facility or a closed distribution system to provide demand response services to system operators

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 27		
Article 28	<p>On art. 28.2 (d)</p> <p>The EU DSO Entity believes that although the services of (d) are available to all RSOs, this drafting inappropriately refers to only TSOs.</p>	<p>28.2.</p> <p>(d) be capable of controlling power consumption from the network in a range equal to the range contracted, directly or indirectly through a third party, by the relevant system operator;</p>
Article 29		
Article 30		
Article 31	<p>The EU DSO Entity does not agree with the addition of the new text. A demand unit is defined by its service. A demand unit not providing a service is specifically excluded from the scope of the NC DC in Article 3.1(d).</p>	<p>1. The operational notification procedure for demand units used by a demand facility or a closed distribution system to provide demand response to system operators shall be distinguished between:</p> <p>(a) demand units within a demand facility or a closed distribution system connected at a voltage level of or below 1 000 V;</p> <p>(b) demand units within a demand facility or a closed distribution system connected at a voltage level above 1 000 V.</p>
Article 32	<p>The EU DSO Entity does not agree with the addition of the new text. A demand unit is defined by its service. A demand unit not providing a service is specifically excluded from the scope of the NC DC in Article 3.1(d).</p>	<p>1. The operational notification procedure for a demand unit within a demand facility or a closed distribution system connected at a voltage level of or below 1 000 V shall comprise an installation document.</p>
Article 33		

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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[NEW] TITLE XXX - Connection of V1G electric vehicles and associated V1G electric vehicle supply equipment, power-to-gas demand units and heat-pumps

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)
	<p>Point 1. on Art XX.3</p> <p>The diagram XX is not appropriate This is a diagram for generation – it needs redrawing to be applicable to demand.</p> <p>Also it does not seem appropriate to include the word “inclusive” – a threshold by definition cannot be included since it lies between or</p>	<p>Point 1.</p> <p>The diagram of Figure XX needs to be replaced with a diagram that is appropriate for loads</p> <p>3. With regard to LFSM-UC on V1G electric vehicles and associated V1G electric vehicle supply equipment and power-to-gas demand units:</p> <p>(a) The V1G electric vehicle and associated V1G electric vehicle supply equipment and the power-to-gas demand unit shall be capable of reducing the consumption from the current active power input automatically down to the minimum technical operational level according to the indicative Figure XX at a frequency threshold and with a droop setting:</p> <p>(b) The droop shall be 5%.</p> <p>(c) The frequency threshold shall be 49,8 Hz, except for synchronous area IE where the frequency threshold shall be 49,5 Hz.</p> <p>(d) The V1G electric vehicle and associated V1G electric vehicle supply equipment and the power-to-gas demand unit shall stay in this specific mode as long as the frequency is below the frequency threshold. If the frequency</p>

Article XX

outside what is being described.

Point 2. on Art XX.3 - new point

The EU DSO Entity welcomes the addition of blocking capabilities in the draft RfG and believes it is therefore appropriate to include something similar for demand in this Article.

Point 3. - on Art. XX.4

The EU DSO Entity welcomes the addition of blocking capabilities in the draft RfG and believes it is therefore appropriate to include something similar for demand in this Article XX.4 -new article (i).

Point 4 - on Art XX.5.

It is necessary to add text to cater for single phase V1G equipment.

Point 5 - on Art XX 6

It is necessary to add text to cater for single phase V1G equipment.

recovers, the electrical charging demand unit shall follow the same power-frequency characteristic until it is back to its prior state of active power input.

Point 2.

(j)The V1G electric vehicle and associated V1G electric vehicle supply equipment and power-to-gas demand units shall be able to receive and react on an external signal allowing the relevant system operator to block active power LFSM-UC mode in real-time. The TSO in coordination with the RSO shall define the framework conditions for the use of this function.

Point 3.

(i) The heat-pumps shall be able to receive and react on an external signal allowing the relevant system operator to block active power LFSM-UC mode in real-time. The TSO in coordination with the RSO shall define the framework conditions for the use of this function.

Point 4.

b. The voltage-against-time-profile expresses a lower limit of the profile of the phase-to-phase voltages (or phase to neutral voltage for single phase V1G electric vehicles) on the network voltage level during a symmetrical fault, as a function of time before, during and after the fault.

Point 5.

		b. The voltage-against-time-profile expresses a lower limit of the profile of the phase-to-phase voltages (or phase to neutral voltages for single phase V1G electric vehicles) on the network voltage level during a symmetrical fault, as a function of time before, during and after the fault.
Article XX+1		
Article XX+2		
Article XX+3		

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 34		
Article 35		
Article 36		
Article 37		
Article 38		
Article 39		
Article 40		
Article 41		
Article 42		
Article 43		
Article 44		
Article 45		
Article 46		
Article 47		

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

The maximum file size is 1 MB

TITLE V - Applications and 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 48		
Article 49	The EU DSO Entity believes it is appropriate that the timescales here should be agreed between the relevant TSO and the relevant system operator.	<p>1. Demand facility owners, DSOs and CDSOs shall assist and contribute to the cost-benefit analysis undertaken according to Articles 48 and 53 and provide the necessary data as requested by the relevant system operator or relevant TSO within three months of receiving a request, unless agreed otherwise by the relevant TSO and relevant system operator.</p> <p>.....</p>
Article 50		
Article 51		
Article 52		
Article 53		
Article 54		
Article 55		

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

The maximum file size is 1 MB

TITLE VI - Non-binding guidance and monitoring of implementation

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 56	The EU DSO Entity believes that given the legal requirement for the Entity to provide strategic input into the development of the EU's energy systems it is appropriate that IGDs, where relevant, are coordinated with the EU DSO Entity.	1. No later than six months after the entry into force of this Regulation, the ENTSO for Electricity shall, in co-ordination with the EU DSO Entity, prepare and thereafter every two years provide non-binding written guidance to its members and other system operators concerning the elements of this Regulation requiring national decisions. The ENTSO for Electricity shall publish this guidance on its website.
Article 57		

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

The maximum file size is 1 MB

TITLE VII - Final provisions

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 58		
Article 59	The EU DSO Entity believes that the legal text needs to deal with the relationship between this version of the Regulation and the current published version. This is the same concerns we have with the RfG.	

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

The maximum file size is 1 MB

ANNEX I

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)
Annex I		

Please upload figures or tables if necessary

The maximum file size is 1 MB

ANNEX II

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)
Annex II		

Please upload figures or tables if necessary

The maximum file size is 1 MB

Other additional provisions

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

	Text amendment proposal (if applicable)
Other new provisions	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Background Documents

[NC DC ACER draft amendments for PC 2023 E 07.docx](#)

Contact

acer-ele-2022-015@acer.europa.eu