

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')**.

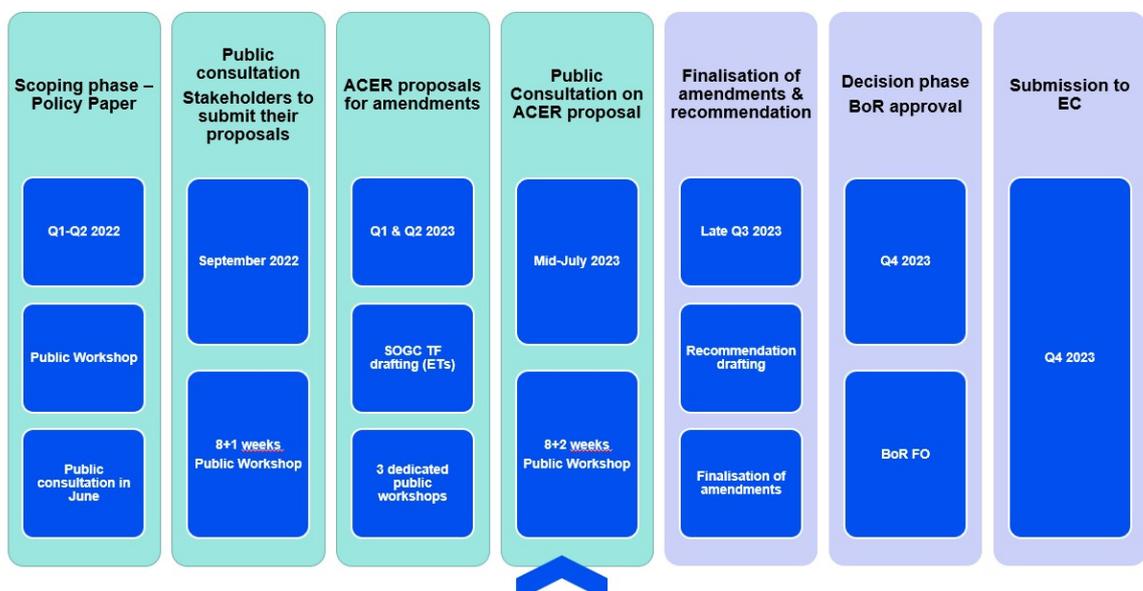
For draft amendments concerning Network Code on Demand Connection ('NC DC'), please go to the respective form: [NC DC](#).

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:

Enel Group

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Italy

* 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:

Energy utility (generator, DSO, retailer)

* 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)
New article	3

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.

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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 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)	<p>The last statement in Recital (9) goes against the inherent possibility of operation strategy optimization of the "hybridation" of technologies, therefore it should be removed.</p> <p>The meaning of this paragraph is not clear and difficult to interpret: "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"</p>	<p>(9)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 runs indivisibly. An installation containing a set of synchronous machines that cannot be operated independently from each other, such as a 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. Electricity storage integrated into a power-generating module, where a 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 power-generating module while its maximum capacity (Pmax ESM) should not count towards the power-generating module capacity for the determination of significance.</p>
(10)		
(**)		
(11)		
(12)		
(13)		

(14)		
(15)		
(16)		
(17)		
(x)		
(18)		
(19)		
(**)		
(20)		
(21)		
(22)		
(**)	The grid forming technology in high scale installation is not yet adequately tested. Grid forming capabilities can not be provided by all standard PPM, it shall be choose depending of each specific node, such capabilities shall have been specified by the TSO or not, as stated in article Y point 5. Both technology grid following and grid forming shall be kept.	
(23)		
(24)		
(25)		
(**)		
(26)		
(27)		
(28)		
(29)		
(30)		
(31)		

(32)		
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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)	Maximum capacity should refer to the power measured at the connection point. Therefore the definition should be clarified.	'maximum capacity' or 'Pmax' means the maximum continuous active power, measured at the connection point, which a power-generating module can produce, less any demand and losses associated solely with facilitating the operation of that power-generating module as specified in the connection agreement or as agreed between the relevant system operator and the power-generating facility owner, or determined by other appropriate means, where an agreement is not required;
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)		
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Article 2(33)		
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Article 2(35)		
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Article 2(59)		
Article 2(60)		
Article 2(61)		
Article 2(62)		
Article 2(63)		

Article 2(64)		
Article 2(65)		
Article 2(66)		
Article 2(67)		
Article 2(68)	The maximum consumption capacity should be the maximum continuous active power plus and not less any demand or losses associated.	(68) 'maximum consumption capacity' means the maximum continuous active power which a demand unit or electricity storage module can consume, plus any demand or losses associated solely with facilitating the operation of that demand unit or electricity storage module, as specified in the connection agreement or as agreed between the relevant system operator and the demand facility owner or power-generating facility owner, or determined by other appropriate means, where an agreement is not required.
Article 2(69)		
Article 2(70)		
Article 2(71)		
Article 2(72)		
Article 2(73)		
Article 2(74)		
Article 2(75)	The figure owning the electrical charging park can delegate operation to an operator responsible of securing the technical standards." Operating" should be included in the definition	(75) 'Electrical charging park owner' means a natural or legal entity owning or operating a V1G or V2G electrical charging park.

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>The reactive change should not be limited in the legal text. We propose it is the TSO to decide what is significant modernisation for a deviation in reactive power.</p> <p>The suggestion is to editing Article 4a (2)(d). The terms “maintenance and repair” are not completely defined and, in addition their should not constitute a reason of significant modernization.Following the deleted text has been compiled a proposal for a new point (d) of list.</p> <p>The last sentence of Article 4a(2) should be modified to include relevant DSOs since they will be impacted by additional criteria of modernisation.</p> <p>Article 4a.2.c, This change is not clear enough and could generate multiple interpretations. This statement shall be further developed for a better understanding. Which magnitude/level of change is required to be considered as significant?</p>	<p>(b) a deviation from the reactive power capability of the power-generating module, whether this deviation results from one modernisation or c several successive modernisations, of a minimum percentage to be proposed by the TSO; and</p> <p>(d) any intervention, software or hardware in single power generating units, determining a modification of existing capabilities of an existing power generating module.</p> <p>Article 4a(2): In the proposal, TSO and relevant DSOs can propose additional criteria defining a significant modernisation.</p>

<p>Article 5</p>	<p>Article 5.3(b)(i) and (ii) should be modified for the same reason.</p> <p>Article 5.3 should be modified: The proposal of modification aim to improve and harmonize the way to work to establish the thresholds for each kind of PGMs in accordance with the article 10, where is foreseen a full coordination between RSOs and relevant TSOs at national level. For the same reason, Article 5.4 should be modified after point (b).</p> <p>Enel Group believes that Article 5.6(b) and (c) should be modified increasing the maximum limit for EV2 to 100 kW (and therefore of EV2 to more than 100 kW) to harmonize them with type B minimum threshold,</p>	<p>Article 5.3(b)(i): maximum capacity at or above a threshold specified by each relevant TSO in agreement with relevant DSO.</p> <p>Article 5.3(b)(ii): maximum capacity at or above a threshold specified by each relevant TSO in agreement with relevant DSOs.</p> <p>Article 5.3. Proposals for maximum capacity thresholds for types B, C and D power-generating modules shall be subject to approval by the relevant regulatory authority or, where applicable, the Member State. In accordance with Article 10, relevant System Operators and relevant TSOs shall carry out a public consultation, in a coordinated manner among them, including competent authorities of each Member State and taking into account the views of the stakeholders. A proposal by the relevant TSO in agreement with relevant DSOs to change the thresholds shall not be made sooner than three years after the approval of the previous proposal.</p> <p>Article 5.6 (b) maximum capacity larger than or equal to 2,4 kW and less than or equal to 100kW (type EV2); (c) maximum capacity larger than 100kW and less than 1 MW (type EV3).</p>
<p>Article 6</p>		
<p>Article 7</p>		
<p>Article 8</p>		

Article 9		
Article 10		
Article 11	<p>Article 11 should be modified to include the EU DSO Entity as stakeholder to be involved together with ENTSO-E. Enel Group believes it is also important to explicitly reference to harmonized technical standards in the wording.</p>	<p>The European Union Agency for the Cooperation of Energy Regulators (ACER), in close cooperation with the European Network of Transmission System Operators for Electricity (ENTSO for Electricity) and the EU DSO Entity, shall organise stakeholder involvement regarding the requirements and the reference to harmonized technical standards for grid connection of power-generating facilities, 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 power-generating facilities.</p>
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

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)	<p>Article 13(2)(b)(iv) should be modified. The possibility to use ROCOF protection to avoid uncontrolled islanding in case of local faults shall be maintained (local an temporary). In Article 13(2)(c) the numbering is wrong, it should (iv) not (iii)</p>	<p>(iv) If the rate-of-change-of-frequency is used for loss of mains protection, the relevant system operator, in agreement with the relevant TSO, shall specify the thresholds of this rate-of-change-of-frequency-type loss of mains protection which shall not jeopardise frequency-ride-through performance except in case of local and temporary needs.</p> <p>(c) Protection schemes, other than those specifically referred to in paragraph b(iv) above, shall not jeopardise frequency-ride-through performance specified in paragraph (b).</p>

Article 13(3)	<p>The role of DSO should be enhanced due to the impact on the distribution network. Point (a) and (c) seem to be contradictory as (a) gives the role of setting threshold to TSO and point (c) introduces the values. We propose to leave to TSO the responsibility and delete point (c). In point (g) it is clarify that a proper network should be used and the role of DSO is enforced.</p> <p>It could be better to move directly here, in this chapter the table X reported in Article 15(2)(d)</p>	<p>With regard to the limited frequency sensitive mode — overfrequency (LFSM-O), the following shall apply, as determined by the relevant TSO for its control area in agreement with the DSOs of the same synchronous area to ensure minimal impacts on neighbouring areas:</p> <p>(g) the power-generating module 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. The power generating module shall be able to receive and react on an external signal allowing the relevant system operator to block active power LFSM-O mode in real-time. The TSO in agreement with the relevant system operator shall define the framework conditions for the use of this function by adopting a proper telecommunication network.</p>
Article 13(4)		
Article 13(5)		
Article 13(6)		

Article 13(7)	<p>Considering number of Type A generators present or major DSOs networks, the "undue delay" may be important unless a dedicated communication network (low latency) is present. If so, provided the latency time and the reliability of the communication network is consistent with DSO's operational needs, the network could be shared also with TSOs and the introduction of Grid Forming Converters could be easier. Wording is therefore modified.</p>	<p>7. The power-generating module shall be equipped with a telecommunication interface (input port) in order to modulate, without undue delay, active power output following an instruction being received at the input port.</p> <p>The relevant system operator shall have the right to specify requirements for equipment to make the power-generating module operable remotely. The TSO in agreement with the relevant system operator shall define the framework conditions for the use of this function adopting a proper communication network.</p>
Article 13(8)		
Article 13(9)	<p>In the sentence, the numbering is wrong and the (7) should be replaced with (8). The role of DSO is enforced considering the impact on distribution network.</p>	<p>9. Within the capability defined in paragraph (8)</p> <p>Autonomous connection is allowed unless specified otherwise by the relevant system operator in agreement with the relevant TSO.</p>
Article 13(10)		

Article 13(11)	<p>As suggested before, the interval or limits of thresholds for Δf_1 are reported directly in article 13 (paragraph 3(c)).</p> <p>In point (e) is clarified the reference to ESM since they are defined in Article 2.</p>	<p>(ii) The frequency threshold shall be adjustable between 49,8 Hz and 49,5 Hz inclusive. The default frequency threshold shall be 50 Hz reduced by Δf_1 where Δf_1 is defined in Table X of paragraphs 3(c).</p> <p>(e) The response time T_{resp} (Figure xx in Article 13.2) for LFSM-U-ESM shall be as described below:</p> <ul style="list-style-type: none"> — for synchronous ESM : less or equal to 8 s for an active power setpoint change of 1 pu of capacity excluding the time for switching from consumption to generation or vice versa. — for non-synchronous ESM : less or equal to 0,5 s for an active power setpoint change of 1 pu of capacity excluding the time for switching from consumption to generation or vice versa.
Article 13(12)		
Article 13(13)		
Article 13(14)	<p>In order to clarify the requirements for GFCs for type A, it is useful to recall Article Y(5)</p>	<p>(b) with regard to grid forming capability, power park modules may be required, in accordance with Article Y(5), to fulfil and satisfy the requirements laid down in Article Y.</p>

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)

The requirements set out in article 13a (i.e.: active power frequency response, LFSM, FRT, etc..), imposed on EV1 and EV2 are impacting on control complexity and potentially on interface equipment development cost. Therefore, it would be suggested to differentiate between 'optional V2G services' for EV1 and EV2 below 100 kW, and 'mandatory requirements' for EV3 and for clusters (V2G parks) with a total capacity over 100 kW.

The statements

13a.1.b.(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" and

13a.1.c "The protection schemes shall not jeopardise frequency-ride-through performance specified in paragraph (b)"

are in contradiction with the statement in 13.2.b.(iv) and 13.2.c which allow to define any rate-of-change-of-frequency threshold for interface protections:

13.2.b.(iv) "If the rate-of-change-of-frequency is used for loss of mains protection, the relevant system operator, in coordination with the relevant TSO, shall specify the threshold of this rate-of-change-of-frequency-type loss of mains protection"

13.2.c : Protection schemes, other than those specifically referred in paragraph b(iiiiv) above, shall not jeopardise frequency-ride-through performance specified in paragraph (b).

(c) The protection schemes shall not jeopardise frequency-ride-through performance except in case of local and temporary needs .

Article 13a(2)		
Article 13a(3)	<p>§ 13.9.b mentions default settings for frequency ranges for autonomous connection of generators: Continental Europe: $47.5 \text{ Hz} \leq f \leq 50.1 \text{ Hz}$ Other synchronous areas $47.5 \text{ Hz} \leq f \leq 50.5 \text{ Hz}$ Why a different range ($49.8 \text{ Hz} \leq f \leq 50.2 \text{ Hz}$) for EV (§ 13a.3 et § 13a.4) ?</p>	<p>3. A type EV1 and EV2 V2G electric vehicle and associated V2G electric vehicle supply equipment may autonomously connect to the network under the following conditions: (a) Frequency range $47.5 \text{ Hz} \leq f \leq 50.1 \text{ Hz}$; (b) Minimum observation time: 5 s.</p>
Article 13a(4)	<p>§ 13.9.b mentions default settings for frequency ranges for autonomous connection of generators: Continental Europe: $47.5 \text{ Hz} \leq f \leq 50.1 \text{ Hz}$ Other synchronous areas $47.5 \text{ Hz} \leq f \leq 50.5 \text{ Hz}$ Why a different range ($49.8 \text{ Hz} \leq f \leq 50.2 \text{ Hz}$) for EV (§ 13a.3 et § 13a.4) ?</p>	<p>4. A 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: (a) Frequency range $47.5 \text{ Hz} \leq f \leq 50.1 \text{ Hz}$; (b) Minimum observation time: 60 s.</p>
Article 13a(5)	<p>§ 13.11.a.i mentions a range for the droop for LFSM-U of a storage : [0,2%-5%]. Why impose a strict value at 5% for EV ? This should be decided by the TSOs § 13.11.a.ii mentions that the TSO sets the threshold for LFSM-U of a storage in a range [49,5 Hz - 49,8Hz]. Why impose a strict value at 49,8 Hz for EV ? This should be decided by the TSOs</p>	<p>(b) The droop setting shall be a decision to let to the TSOs in a [0,2%-5%] range (c) The frequency threshold Δf_1 shall be a decision let to TSOs in a range [49,5 Hz - 49,8 Hz] inclusive, except for synchronous area IE where the frequency threshold shall be 49,5 Hz inclusive;</p>
Article 13a(6)	<p>§ 13.3.d requires a droop setting in the range [2%-12%] for generators. Why set a strict value at 5 % for EV ? This should be decided by the TSOs</p>	<p>(c) The droop setting shall be a decision let to TSOs in a range [2%-12%] range</p>
Article 13a(7)		

Article 13a(8)	Reference to § 10 for LVRT is not correct. § 9 deals with LVRT	8. With regard to voltage stability, a 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 9 apply .
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)	<p>In (a) role of DSO should be enforced in (i) and (vi)</p> <p>Table XX.1 and XX.2 : The Maximum high voltage value shall be coordinated with the relevant IEC standards for the equipment manufacturing and testing.</p>	<p>(i) unless otherwise provided in this Regulation, a power-generating module 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 agreement with the relevant TSO;</p> <p>(vi) the relevant system operator, in agreement with the relevant TSO, and the power-generating facility owner may agree on wider voltage ranges or longer minimum time periods for operation to ensure the best use of the technical capabilities of a power-generating module, if it is required to preserve or to restore system security.</p>

<p>Article 14(3)</p>	<p>In (iii) Each relevant system operator is already able to make available and publicly the pre-fault and post-fault conditions for the fault-ride-through capability.</p> <p>FRT diagram is referred to the rated voltage at the point of connection of facility. Respect to it will be calculated the 1 p.u.</p> <p>Suggestion is to use the diagram of EN 50549 – 2, to have a full alignment with that and the present code; avoiding the misunderstanding and confusion. Suggestion is to use the diagram of EN 50549 – 2 (see attachment), to have a full alignment with that and the present code; avoiding the misunderstanding and confusion.</p> <p>In (iv) the role of DSO is enforced</p> <p>In (v) FRT diagram is referred to the rated voltage at the point of connection of facility. Respect to it will be calculated the 1 p.u.</p> <p>Figure 3. There isn't an alignment between FRT curve in RfG and EN50549, The proposal is to use EN50549 curve more stringent, or to specify that the indicate curve on RfG it's a less stringed acceptable one.</p> <p>Table 3.1.1 and 3.2.1,3.2.2 seem o be not aligned with figure 3. Furthermore, the auspicious is to use the diagram of FRT defined on EN 50549-2 and, consequently to compile the tables with the values of those diagrams.</p>	<p>(iii) the lower limit referred to in point (ii) shall be specified by the relevant TSO using the parameters set out in Figure 3 or in harmonized standards if more stringent , and within the ranges set out in Tables 3.1.1, 3.1.2, 3.2.1 and 3.2.2;</p> <p>(iv) each TSO in agreement coordination 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:</p> <p>(v) pre-fault operating point of the power-generating module expressed in active power output and reactive power output at the connection point and rated voltage at the connection point, and</p>
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<p>Article 14(4)</p>	<p>Automatic reconnection should (shall) be subject only by the authorizations by SO where the PGM (or PGF) is directly connected.</p> <p>Conditions for reconnection are specified by the SO, owner of network where the PGM (or in general PGF) is directly connected. Moreover the DSO should also decide on the reconnection conditions.</p>	<p>(a) the use of the autonomous connection function shall be subject to prior authorisation by the relevant system operator and to the reconnection conditions specified by the relevant RSO</p> <p>(b) within the capability defined in Article 13(7), the relevant TSO, in agreement with the relevant system operator, shall specify the settings for an autonomous connection. If no settings are specified, the default settings for an autonomous connection of Article 13(8) shall apply.</p>
<p>Article 14(5)</p>	<p>(d)(i) and (d)(ii) should be integrated defining the communication network (low latency)</p>	<p>(i) power-generating facilities 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 adopting a proper low latency telecommunication network. The content of real-time data shall be consistent with the data exchange requirements laid down in Title 2 of Regulation (EU) 2017/1485 ;</p> <p>(ii) power-generating facilities shall be capable of exchanging real time data for metering with the relevant system operator or the relevant TSO adopting a proper telecommunication network;</p>

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)		
Article 14a(6)		
Article 14a(7)		
Article 14a(8)	This sentence is valid taking into account the suggestion to define a higher minimum threshold for EV3 (setting the value to 100 kW which in some cases is aligned with type B threshold)	

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	<p>General proposal is to move the provisions directly in Article 13.</p> <p>The sentence "The relevant TSO shall specify if fault-ride-through capabilities shall be required for Type A synchronous power generating modules" is coherent as long as the Type A generators are connected directly to networks directly owned or managed by TSO; this kind of network, generally are in HV or EHV levels. In other case (so level of voltages) would it not to be the EN 50549 standards ?</p>	

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)	(a) Could it be rearranged this sentence? It is not fully clear	

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

[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)	<p>The list of condition and calculation can be make only by the SO owner of network where the PGM (and in general a PGF) is directly connected). The proposal should be to change totally the sentence as proposed</p>	<p>3. Each Relevant System Operator per each PPM, shall specify and make publicly available the pre-fault and post-fault conditions for the fault-ride-through capability in terms of:</p> <ul style="list-style-type: none"> (a) the calculation of the pre-fault minimum short circuit capacity at the connection point, (b) pre-fault active and reactive power operating point of the power-generating module at the connection point and voltage at the connection point, and (c) calculation of the post-fault minimum short circuit capacity at the connection point;
Article Y(4)		

Article Y(5)	<p>No studies were performed considering distribution networks. On transmission system where only large PGM are connected, simulations are possible using legacy digital model from manufacturers. On distribution networks where mass market products are used and millions of inverters are connected no simulation is possible due to the absence of standardized digital models. This was pointed out clearly several times during public workshops and it is also under consideration from CENELEC WG 03. Due to this, it is impossible to exclude the need of the activation /deactivation function by remote as system operators have no expectations of the behavior of the grid. The additional cost for manufacturers is not so high both regarding HW /FW and type test (mass market) compared to the adequacy costs for the grid which will be shared by all society through tariffs.</p> <p>As an alternative solution, type A shall be excluded from grid forming capability.</p>	<p>5. The Member State or the body designated by the Member State shall set out a formal process by which the relevant TSO in agreement with the relevant system operators, may specify that type A power park modules shall be capable of providing grid forming capability at the connection point, as established in Article Y(8). The process shall consider the maintenance and operating procedures, the impact on the distribution network and the eventual necessary interventions on it. Furthermore, the relevant TSO in agreement with the relevant system operator shall require activation or deactivation of grid forming capability if any, as established in Article Y(9).</p>
Article Y(6)		

<p>Article Y(7)</p>	<p>Grid forming mode and grid following mode have to be defined and the provision maintained.</p>	<p>7. The relevant system operator may specify that if the activation of grid forming mode is foreseen, it is subject to necessary adaptations to the system operator's network and operating and maintenance procedures. The Member State or the body designated by the Member State may set the formal and substantive conditions under which the relevant system operator may conduct such specification.</p>
		<p>8. Power park modules capable of providing grid forming capability at the connection point shall implement the characteristics and requirements as listed below.</p> <p>(a) Within the power park module's current and energy limits, the power park module shall be capable of behaving at the terminals of the individual unit(s) as a voltage source behind an internal impedance (Thevenin source), during normal operating conditions (non-disturbed grid conditions) and upon inception of a grid disturbance (including voltage, frequency and voltage phase angle disturbance). The Thevenin source is characterized by its internal voltage amplitude, voltage phase angle, frequency and internal impedance.</p> <p>(b) Upon inception of a grid disturbance and while the power park module capabilities and current limits are not exceeded, the instantaneous AC voltage characteristics of the internal Thevenin source according to paragraph (a) shall be capable of not changing its amplitude and voltage phase angle while positive-sequence voltage phase angle steps or</p>

Article Y(8)

Changes in the wording of the first sentence. The point (d) is deleted and better explicit as new Article Y(9) due to the importance that the activation/deactivation of grid forming remain a market-based service for all type of generators, Type B/C/D included.

voltage magnitude steps are occurring at the connection point. The current exchanged between the power park module and the network shall flow naturally according to the main generating plant and converter impedances and the voltage difference between the internal Thevenin source and the voltage at the connection point.

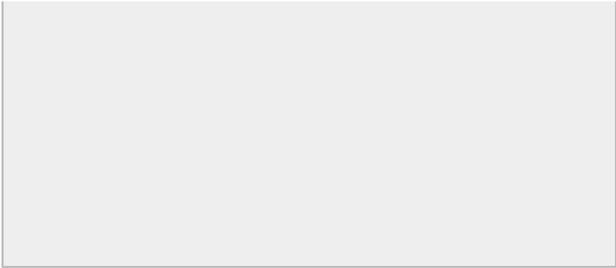
(c) After the inception of a network disturbance in voltage magnitude, frequency or voltage phase angle, the following shall apply within the power park module's capability, including current limits and inherent energy storage capabilities of each individual unit.

(i) The relevant system operator in agreement coordination with the TSO shall specify the temporal parameters of the dynamic performance regarding voltage control.

(ii) Where current limitation is necessary, the relevant system operator may specify additional requirements regarding the contribution of active and reactive power at the point of connection.

(iii) The power park module shall be capable of stable operation when reaching the power park module current limits, without interruption, in a continuous manner and returning to the behaviour described in paragraph (b) as soon as the limitations are no longer active. If reaching the current limit, the grid-forming behaviour must be maintained for responses as specified in paragraph (b) for disturbances that require the current to vary in the opposite direction of the current limitation.

Inherent energy storage means an energy



reserve available in the physical components of a power park module, which has not necessarily been designed to suit the grid forming requirements of this Article but may be used for such purposes, without affecting the design of the physical components of individual units.

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

	Text amendment proposal (if applicable)
New provision	9. The power park module shall have the capability to activate or deactivate grid-forming mode. The activation or deactivation of grid-forming mode shall be operated both locally and remotely in real time using a proper network and infrastructure dedicated with low latency and high resiliency features and operated in agreement with TSO and relevant system operators.

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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)	<p>To avoid any risk and collateral effects in terms of security of operation and safety for distribution system, the proposal is to introduce the GFCs, in mandatory way, only for type B PGMs directly connected to a voltage level equal or above 110 kV or at bus bars of substation of relevant system operators. For the type B below 110 kV, the GFCs should be carefully assessed and agreed between TSO and relevant system operators. Moreover, the activation/deactivation of GFCs should be always possible as mentioned in the new Article Y(9)</p>	<p>1. Type B power park modules shall fulfil the requirements laid down in Article 13, Article 14, and Article Y(6), (7), except for Article 13(2) (b) and Article 13(8).</p> <p>Type B directly connected to the network with a voltage level equal to or above 110 kV, shall be capable of providing grid forming capability according to Article Y(8) and Article Y(9). Relevant TSO, in agreement with relevant system operators, taking into account the maintenance and operating procedures, the impact on the distribution network and the eventual necessary interventions, may specify that type B PPMs directly connected to distribution networks with a voltage level below 110 kV, shall be capable of providing grid forming capability according to Article Y(8) and Y(9).</p>
Article 20(2)		
Article 20(3)		

<p>Article 20(4)</p>	<p>To avoid any risk and collateral effects in terms of security of operation and safety for distribution system, the proposal is to introduce the GFCs, in mandatory way, only for type B PGMs directly connected above 110 kV or at bus bars of substation of relevant system operators.</p>	<p>4. Type B power park modules implementing grid forming capability shall fulfil the following additional requirements in relation to grid forming capability:</p> <p>(a) The relevant, TSO in agreement with the relevant system operator, shall specify the contribution to synthetic inertia. The power park module shall be capable of contributing to limiting the transient frequency deviation under high frequency conditions. Additionally, the electricity storage module shall be capable of contributing to limiting the transient frequency deviation under low frequency conditions.</p> <p>(b) The dynamic performance according to Article Y(8)(c)(i) shall reflect the specified contribution to synthetic inertia.</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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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)	To avoid any risk and collateral effects in terms of security of operation and safety for distribution system, the proposal is to introduce the GFCs, in mandatory way, only for type C PGMs directly connected to a voltage equal or above 110 kV or at bus bars of substation of relevant system operators. For type C below 110 kV the activation of GFCs should be carefully assess and agreed between TSO and relevant system operators. Moreover, the activation/deactivation of such solution should be always possible, as stated in the new Article Y(9) to guarantee that GFCs remain a market-based service.	<p>1. Type C power park modules shall fulfil the requirements listed in Article 13, Article 14, Article 15, Article Y(6),and Article 20, except for Article 13(2) (b) Article 13(6) and Article 13(8) and Article 20(2) (a), unless referred to otherwise in point (v) of paragraph 3(d).</p> <p>Type C directly connected to the network with a voltage level equal to or above 110 kV, shall be capable of providing grid forming capability according to Article Y(8) and Y(9).</p> <p>Relevant TSO, in agreement with relevant system operators, taking into account the maintenance and operating procedures, the impact on the distribution network and the eventual necessary interventions, may specify that Type C PPMs directly connected to distribution networks with a voltage level below 110 kV, shall be capable of providing grid forming capability according to Article Y(8) and Y(9).</p>
Article 21(2) [deleted]		
Article 21(2)		
Article 21(3)	The requirements given through Figure 9 should be generic for a PPM (including BESS). However, P-Q graph indicated in Figure 9 seems not to be applicable for a BESS/EMS where active power could be either positive or negative	21.3.c.iii figure 9

<p>Article 21(4)</p>	<p>To avoid any risk and collateral effects in terms of security of operation and safety for distribution system, the proposal is to introduce the GFCs, in mandatory way, only for type C PGMs directly connected above 110 kV or at bus bars of substation of relevant system operators.</p>	<p>4. Type C power park modules implementing grid forming capability shall fulfil the following additional requirements in relation to grid forming capability:</p> <p>(a) The relevant TSO, in agreement with the relevant system operator, shall specify the contribution to synthetic inertia. The power park module shall be capable of contributing to limiting the transient frequency deviation under high and low frequency conditions.</p> <p>(b) For the provision of additional energy above the inherent energy storage, the relevant TSO may apply to the regulatory authority for the right to require the provision of additional energy beyond the inherent energy storage in coordination with the relevant system operator.</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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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)	Remote Activation/Deactivation of grid forming in all type of generators should be allowed to guarantee that this service remain market-based. Therefore the requirements listed in new Article Y(9) is introduced	1. Type D power park modules shall fulfil the requirements listed in Article 13, Article 14, Article 15, Article Y(6),(8) and (9), Article 20, and Article 21, except for Article 13(2)(b), Article 13(6), Article 13(7), Article 13(8), Article 15(3), and Article 20(2)(a).

<p>Article 22(2)</p>	<p>Oscillations damping control is not yet a standard control for all type of PPM. It should remain a voluntary requirement or an agreement with relevant TSO.</p>	<p>2. With regard to power oscillations damping control,, if specified by the relevant TSO, type D power park modules shall have a power oscillation damping function which helps to attenuate the power oscillations through the control of the active power, reactive power, or both. The power oscillation damping shall be able to damp inter-area oscillations in the range of, at least, 0,1 Hz – 1,0 Hz. The relevant TSO shall have the right to request and approve the tuning of the power oscillation damping by the power-generating facility owner to damp the inter-area oscillation mode based on frequency ranges specified by the relevant TSO in agreement with adjacent TSO or TSOs. The relevant TSO shall have the right to request the tuning of the power oscillation damping by power-generating facility owner to damp the local oscillation mode, in which the power park modules is oscillating against the grid .</p> <p>The proposed power oscillation damping control shall be approved by the relevant TSO.</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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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	Proposal to remove point (f) because this requirement can represent a burden for type A PGM	<p>2. The relevant system operator shall specify the content of the installation document, which shall have at least the following information:</p> <ul style="list-style-type: none"> (a) the location at which the connection is made; (b) the date of the connection; (c) the maximum capacity of the installation in kW; (d) the type of primary energy source; (e) the classification of the power-generating module as an emerging technology according to Title VI of this Regulation; (f) as regards equipment used, for which an equipment certificate has not been received, information shall be provided as directed by the relevant system operator; and (g) the contact details of the power-generating facility owner and the installer and their signatures.
Article 30a [new]		
Article 30b [new]	If the definition of electrical charging park owner in Article 2 does not include the operator of the park, this should be clarified here	<p>1. For the purpose of operational notification for connection of each new type EV3 V2G electric vehicle supply equipment, a supply equipment document ('SED') shall be provided by the electrical charging park owner or operator to the relevant system operator and shall include a statement of compliance.</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

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	Proposal to add a new point 7 in case of failed compliance.	7. If compliance tests or simulations cannot be carried out as agreed between the relevant system operator and the power-generating facility owner due to reasons attributable to the power-generating facility owner, then the relevant system operator will withhold the operational notification referred to in Title III, and disconnect the generation facility.
Article 42		
Article 43		
Article 44		
Article 45		
Article 46		
Article 47	harmonized standards/documents to demonstrate compliance with the relevant requirement	1. Power-generating facility owners shall undertake LFSM-O and LFSM-U-ESM response compliance tests in relation to type B power park modules. Instead of the relevant test, the power-generating facility owner may use equipment certificates issued by an authorised certifier using harmonized standards/documents to demonstrate compliance with the relevant requirement. In that case, the equipment certificates shall be provided to the relevant system operator.

Article 48	harmonized standards/documents to demonstrate compliance with the relevant requirement	1. In addition to the compliance tests for type B power park modules described in Article 47, power-generating facility owners shall undertake the compliance tests set out in paragraphs 2 to 9 in relation to type C power park modules. Instead of the relevant test, the power-generating facility owner may use equipment certificates issued by an authorised certifier using harmonized documents/standards to demonstrate compliance with the relevant requirement. In such a case, the equipment certificate shall be provided to the relevant system operator.
Article 49		
Article 50		
Article 51	The DSO should also be able to require a stability compliance for the LFSM-O control in a close loop operation	(d)The relevant TSO and DSO has the right to request a stability compliance for the LFSM-O control in a close loop operation set up of the synchronous power-generating module.
Article 52		
Article 53		

<p>Article 54</p>	<p>harmonized standards/documents to demonstrate compliance with the relevant requirement</p>	<p>1. Type B power park modules are subject to the compliance simulations in paragraphs 2 to 5. Instead of all or part of those simulations, the power-generating facility owner may use equipment certificates issued by an authorised certifier using harmonized documents /standards, which shall be provided to the relevant system operator</p> <p>Article 54.2.d: (d) the relevant TSO and DSO may request a stability compliance for the LFSM-O control in a close loop operation set up of the power park module.</p>
<p>Article 55</p>	<p>harmonized standards/documents to demonstrate compliance with the relevant requirement</p> <p>For the simulation it'S necessary DSOs envolvment.</p>	<p>1. In addition to the compliance simulations for type B power park modules set out in Article 54, type C power park modules are subject to the compliance simulations set out in paragraphs 2 to 7. Instead of all or part of those simulations, the power-generating facility owner may use equipment certificates issued by an authorised certifier using harmonized documents /standards, which shall be provided to the relevant system operator</p> <p>Article 55.4 (c): (c) for the simulations of point (a) of Article 55(4) the relevant TSOin agreement with the DSO should define an external short-circuit power and inertia to supplement the island scenario at the connection point.</p>
<p>Article 56</p>		
<p>Article 57</p>		

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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