

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')**.

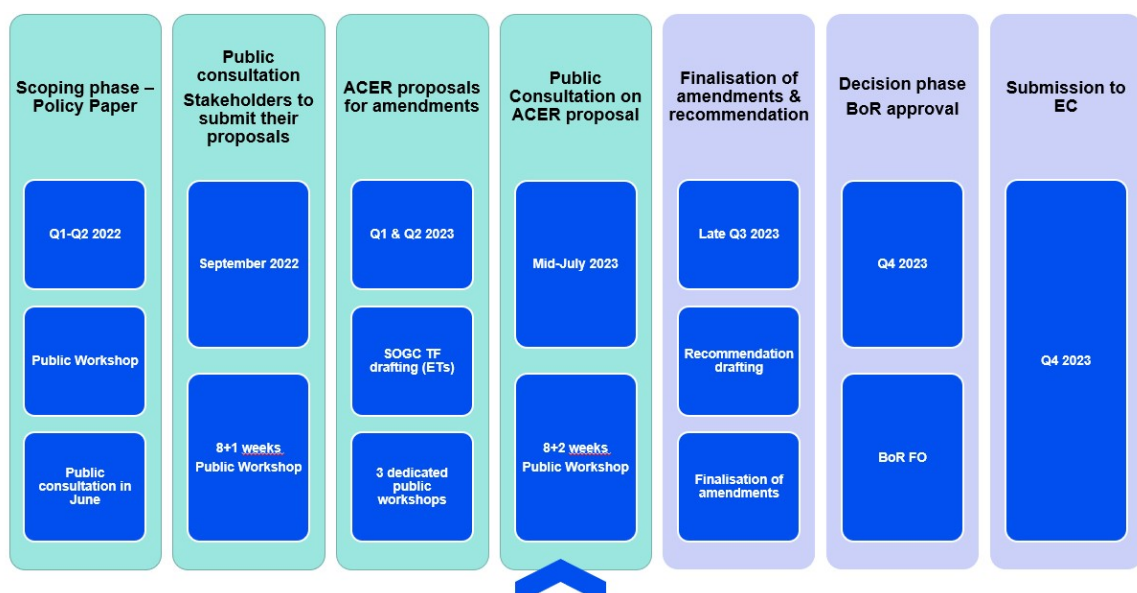
For draft amendments concerning Network Code on Demand Connection ('NC DC'), please go to the respective form: [NC DC](#).

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:

Fingrid Oyj

* Contact person:

[REDACTED]

* Contact person's email address:

[REDACTED]

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

Finland

* 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 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	

Please upload figures or tables if necessary

 The maximum file size is 1 MB

Select file to upload

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

Step 3

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

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

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

FILE UPLOAD

Please upload your file here

The maximum file size is 1 MB

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

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

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

Please upload your file

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Due to the significant length of this survey:

- you have the possibility to edit your answer after submission. When clicking on "Submit" button, you will be given a Contribution ID which you can then use to access your answers and edit them, if necessary.
- we kindly suggest that you download the entire survey as .pdf (link on the right), prepare your answers and then upload them at once in the EU Survey Tool, to avoid a session timeout on submission.

The maximum length of each cell is 5000 characters. This is the maximum technical limit set by the EUsurvey tool, which cannot be increased.

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>RfG does not recognize hybrid power plants. How should they be treated? For example, if we have a combination of Wind, PV and ESS connected to the same POC and the whole arrangement is controlled by common controller used to control active and reactive power output, plant level voltage control etc.</p> <p>For hybrid power plants consisting of e.g. wind power plant (WPP) and an energy storage (ESS), the Pmax has to be defined based on maximum power available at the connection point of the power plant. It can be at maximum the sum of Pmax_WPP and Pmax_ESS or lower, if limited by a hybrid controller. Thus, the capacity of the ESS shall not be neglected.</p>	

(10)		
(**)		
(11)		
(12)		
(13)		
(14)		
(15)		
(16)		
(17)		
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(18)		
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(22)		
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(23)		
(24)		
(25)		
(**)		
(26)		
(27)	On component level, yes, we agree but the compliance of power plants as an entity has to be ensured. Consequently, proper design of the entire power plant to work as a whole has to be emphasized.	
(28)		

(29)		
(30)		
(31)		
(32)		

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

	Text amendment proposal (if applicable)
New recital	

Definitions (Article 2)

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

Includes new definitions

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 2(1)		
Article 2(2)		
Article 2(3)		
Article 2(4)		
Article 2(5)		
Article 2(6)		
Article 2(7)		
Article 2(8)		
Article 2(9)		
Article 2(10)		
Article 2(10a)		
Article 2(11)		
Article 2(12)		
Article 2(13)		
Article 2(14)		
Article 2(15)		
Article 2(16)		
Article 2(17)		
Article 2(18)		
Article 2(19)		
Article 2(20)		
Article 2(21)		
Article 2(22)		
Article 2(23)		
Article 2(24)		

Article 2(25)		
Article 2(26)		
Article 2(27)		
Article 2(28)		
Article 2(29)		
Article 2(30)		
Article 2(31)		
Article 2(32)		
Article 2(33)		
Article 2(34)		
Article 2(35)		
Article 2(36)		
Article 2(37)		
Article 2(38)		
Article 2(39)		
Article 2(40)		
Article 2(41)		
Article 2(42)		
Article 2(43)		
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Article 2(62)		
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Article 2(64)		
Article 2(65)		
Article 2(66)		
Article 2(67)		
Article 2(68)		
Article 2(69)		
Article 2(70)		
Article 2(71)		
Article 2(72)		
Article 2(73)		
Article 2(74)		
Article 2(75)		

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

	Text amendment proposal (if applicable)
New definition	

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		
Article 4		
Article 4a [new]	Reactive power range defined by TSO should be 5-20%	
Article 5		
Article 6	2e: Disconnection at frequency as high as 49 Hz can cause serious problems if large number of pump storages is disconnected simultaneously. At least in Finland there are plans to connect large amount of pump modules to grid and the amount of pumps to be disconnected at 49Hz might exceed the dimensioning fault (1300MW).	
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		

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

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

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TITLE II CHAPTER 1 - General Requirements

General requirements for type A power-generating modules

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

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 13(1)		
Article 13(2)		
Article 13(3)	LFSM-O shall be independent and stackable meaning that the function works seamlessly with possibly active FSM control and has parameters of its own.	
Article 13(4)		
Article 13(5)		
Article 13(6)		
Article 13(7)		
Article 13(8)		
Article 13(9)	13(9)f: 5% is preferred as 4% might be too small difference in weak grid.	
Article 13(10)		
Article 13(11)		
Article 13(12)		
Article 13(13)		
Article 13(14)		

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

	Text amendment proposal (if applicable)
New provision	

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

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

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

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

	Text amendment proposal (if applicable)
New provision	

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General requirements for type B power-generating modules

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

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 14(1)		
Article 14(2)[deleted]		
Article 14(2)		
Article 14(3)	<p>14(3)c: At least for Finland, the HVRT profile exaggerates the expected overvoltages. In the recent EMT simulations with wide area grid model with high IBR penetration, we expect overvoltages of 1,25pu for 0,7s followed by 1,2pu until 2,4s after which the voltage settles to 1,1 pu at max. Consequently, requiring 1,2pu for 60 seconds will lead to oversizing of primary equipment causing extra costs. If the amendment is accepted, also the protection settings of new power plants would have to be set acc. to 1,2pu/60 sec which would cause extra stress for old equipment in the grid as it might lead to prolonged overvoltages in the range of 1,1-1,2pu which wouldn't be switched off rapidly.</p>	
Article 14(4)		
Article 14(5)	<p>14(5)b(iii): both transformer and busbar protection at the substation of the power plant should be considered</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)	b(iii): how about change in angle (vector shift)?	
Article 14a(6)		
Article 14a(7)		
Article 14a(8)		

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

	Text amendment proposal (if applicable)
New provision	

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General requirements for type C power-generating modules

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

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 15(1)		
Article 15(2)	c(i); LFSM-U shall be independent and stackable meaning that the function works seamlessly with possibly active FSM control and has parameters of its own.	
Article 15(3)[deleted]		
Article 15(3)		
Article 15(4)		
Article 15(5)		c(i): AND IF NEEDED in electromagnetic simulations

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

	Text amendment proposal (if applicable)
New provision	

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General requirements for type D power-generating modules

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

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

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

	Text amendment proposal (if applicable)
New provision	

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

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

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

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

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

	Text amendment proposal (if applicable)
New provision	

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Please upload figures or tables if necessary

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Requirements for type B synchronous power-generating modules

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

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

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

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

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Requirements for type C synchronous power-generating modules

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

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

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

	Text amendment proposal (if applicable)
New provision	

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Please upload figures or tables if necessary

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Requirements for type D synchronous power-generating modules

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

Includes new paragraphs

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

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

	Text amendment proposal (if applicable)
New provision	

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TITLE II CHAPTER 3 - Requirements for power park modules

[NEW] Requirements for type A power park modules

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

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article Y(1)		
Article Y(2)		
Article Y(3)		
Article Y(4)		
Article Y(5)		
Article Y(6)		
Article Y(7)		
Article Y(8)	8d: If GFL mode is allowed, it must be understood that all simulations and site test have to be conducted also for GFL mode (and not only for GFM mode).	

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

	Text amendment proposal (if applicable)
New provision	

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Please upload figures or tables if necessary

The maximum file size is 1 MB

Requirements for type B power park modules

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

Includes new paragraphs

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

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

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

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Requirements for type C power park modules

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

Includes new paragraphs

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

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

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

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Please upload figures or tables if necessary

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Requirements for type D power park modules

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

Includes new paragraphs

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

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

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

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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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Please upload figures or tables if necessary

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TITLE III - Operational notification procedure for connection

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

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 29		
Article 30		
Article 30a [new]		
Article 30b [new]		
Article 31		
Article 32		
Article 33		
Article 34		
Article 35		
Article 36		
Article 37		
Article 38		
Article 39		

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

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

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TITLE IV - Compliance

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

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 40		
Article 41		
Article 42		
Article 43		
Article 44		
Article 45		
Article 46		
Article 47		
Article 48		
Article 49		
Article 50		
Article 51		
Article 52		
Article 53		
Article 54		
Article 55		
Article 56		
Article 57		
Article 58		
Article 59		

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

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

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	

Please upload figures or tables if necessary

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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	

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

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	

Please upload figures or tables if necessary

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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	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Background Documents

[NC_RfG_ACER_draft_amendments_for_PC_2023_E_07.docx](#)

Contact

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