

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

Fields marked with \* are mandatory.

## Introduction

This consultation aims to present ACER's draft amendments to the Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a **Network Code on Requirements for Grid Connection of Generators ('NC RfG')**.

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

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

## Background

Important developments in the policies of decarbonisation of the European Union (EU) energy and transport sectors have taken place since the inception of the development of the first European Grid Connection Network Codes (GC NCs) in 2012.

In the framework of the Grid Connection European Stakeholder Committee (GC ESC), the European Commission proposed for ACER to initiate the process towards the amendment of the existing GC NCs in September 2022. The amendment process, as presented to the GC ESC is outlined in the Figure below:



Following the scoping phase, ACER published the Policy Paper on the revision of the network code on requirements for grid connection of generators and the network code on demand connection in September 2022. The Policy Paper aimed to transparently indicate to stakeholders the key policy areas in which amendments were to be expected.

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

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

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

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

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

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

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## Stakeholder's details

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ACER is highly committed in processing personal data in a lawful way.

Find out more how we process your data: <https://www.acer.europa.eu/the-agency/about-acer/data-protection>

\* Name of the stakeholder:

Finnish Energy

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

Finland

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\* Type of the stakeholder:

- ☐ Generator (including association)
- ☐ Consumer (including association)
- ☐ Transmission system operator (including association)
- ☒ Distribution system operator (including association)
- ☐ Manufacturers (including association)
- ☐ Academia/research institution
- ☐ Regulatory authority
- ☐ Other (please, elaborate)

Please, elaborate on your answer above, if necessary:

\* Do you consent to the publication of the stakeholder's name?

- ☒ Yes
- ☐ No

\* Do you consent to the publication of provided answers?

- ☒ Yes
- ☐ No (please, note that your answer, without your name and organization, may be shared with the EU institutions and national authorities)

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## Instructions

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

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

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

The mandatory steps for submitting the comments are listed below.

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### ***Step 1***

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

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

Step 2

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

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

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

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

 Includes new articles

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

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

Please upload figures or tables if necessary

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Select file to upload

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

### ***Step 3***

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

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

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

## **FILE UPLOAD**

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Please upload your file here

The maximum file size is 1 MB

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

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

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

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Due to the significant length of this survey:

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

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

## Whereas Section

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

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

|      | Comment on the ACER draft amendments  | Alternative text amendment proposal (if applicable) |
|------|---|---|
| (1)  |   |   |
| (2)  |   |   |
| (3)  |   |   |
| (s1) | This text is a thought out and welcome addition.  |   |
| (s2) | The stated need is reasonably explained.  |   |
| (4)  |   |   |
| (5)  |   |   |
| (6)  |   |   |
| (7)  |   |   |
| (8)  |   |   |
| (9)  | <p>This raises questions. In the usual case of solar PV on the roof of a CCGT facility, could there just be a simple rule when additional non-synchronous generation can be seen insignificant? Assuming there is no reason to determine otherwise.</p> <p>The clarification regarding electricity storage is reasonable, but it is just one use case. Network Codes should be less about single specific use cases and more about general rules.</p> |   |
| (10) |   |   |
| (**) | A reasonable addition.  |   |

|      |   |  |
|------|---|--|
| (11) |   |  |
| (12) |   |  |
| (13) |   |  |
| (14) |   |  |
| (15) |   |  |
| (16) |   |  |
| (17) |   |  |
| (x)  |   |  |
| (18) |   |  |
| (19) |   |  |
| (**) |   |  |
| (20) |   |  |
| (21) |   |  |
| (22) |   |  |
| (**) | Any requirements that are derived from this text should never realize into blanket obligations that affect every Member State. The comment about CBA is good. |  |
| (23) |   |  |
| (24) |   |  |
| (25) |   |  |
| (**) |   |  |
| (26) |   |  |



|      |   |  |
|------|---|--|
| (27) | <p>This is reasonable but can take time.<br/>Standardisation, in general, does not make compromises to meet deadlines.</p> <p>If the standardisation process regarding these requirements is not already ongoing, it is a clear case for improvement in the drafting of future network codes.</p> |  |
| (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)

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

Includes new definitions

|                | Comment on the ACER draft amendments           | Alternative text amendment proposal (if applicable) |
|----------------|--|---|
| Article 2(1)   |  |   |
| Article 2(2)   |  |   |
| Article 2(3)   |  |   |
| Article 2(4)   |  |   |
| Article 2(5)   |  |   |
| Article 2(6)   |  |   |
| Article 2(7)   |  |   |
| Article 2(8)   |  |   |
| Article 2(9)   |  |   |
| Article 2(10)  |  |   |
| Article 2(10a) |  |   |
| Article 2(11)  |  |   |
| Article 2(12)  |  |   |
| Article 2(13)  |  |   |
| Article 2(14)  |  |   |
| Article 2(15)  |  |   |
| Article 2(16)  | The text and comment here are both reasonable. |   |
| Article 2(17)  |  |   |
| Article 2(18)  |  |   |
| Article 2(19)  |  |   |
| Article 2(20)  |  |   |
| Article 2(21)  |  |   |
| Article 2(22)  |  |   |
| Article 2(23)  |  |   |

|               |  |  |
|---------------|--|--|
| Article 2(24) |  |  |
| Article 2(25) |  |  |
| Article 2(26) |  |  |
| Article 2(27) |  |  |
| Article 2(28) |  |  |
| Article 2(29) |  |  |
| Article 2(30) |  |  |
| Article 2(31) |  |  |
| Article 2(32) |  |  |
| Article 2(33) |  |  |
| Article 2(34) |  |  |
| Article 2(35) |  |  |
| Article 2(36) |  |  |
| Article 2(37) |  |  |
| Article 2(38) |  |  |
| Article 2(39) |  |  |
| Article 2(40) |  |  |
| Article 2(41) |  |  |
| Article 2(42) |  |  |
| Article 2(43) |  |  |
| Article 2(44) |  |  |
| Article 2(45) |  |  |
| Article 2(46) |  |  |
| Article 2(47) |  |  |
| Article 2(48) |  |  |
| Article 2(49) |  |  |
| Article 2(50) |  |  |
| Article 2(51) |  |  |
| Article 2(52) |  |  |

|               |  |  |
|---------------|--|--|
| Article 2(53) |  |  |
| Article 2(54) |  |  |
| Article 2(55) |  |  |
| Article 2(56) |  |  |
| Article 2(57) |  |  |
| Article 2(58) |  |  |
| 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) |  |  |
| Article 2(69) |  |  |
| Article 2(70) |  |  |
| Article 2(71) |  |  |
| Article 2(72) |  |  |
| Article 2(73) |  |  |
| Article 2(74) |  |  |
| Article 2(75) |  |  |

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

|                | Text amendment proposal (if applicable) |
|----------------|---|
| New definition |   |

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## TITLE I - General provisions

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

Includes new articles

|                  | Comment on the ACER draft amendments  | Alternative text amendment proposal (if applicable) |
|------------------|---|---|
| Article 1        |   |   |
| Article 3        |   |   |
| Article 4        |   |   |
| Article 4a [new] | There are risks that this leads to widely varying implementations between Member States. Of course, that may also be an accepted outcome.   |   |
| Article 5        |   |   |
| Article 6        | <p>In Finland, during the first RfG, there was an issue regarding the production of hydropower constructed in natural rivers. National water law has requirements regarding the water flow and these requirements were, in the end, deemed to overrule RfG requirements.</p> <p>If water law also applies to a pump-storage PGM, it might be useful to clarify that the water law may overrule RfG requirements. Finnish TSO Fingrid can explain the issue in detail.</p> |   |
| Article 7        |   |   |
| Article 8        |   |   |
| Article 9        |   |   |
| Article 10       |   |   |
| Article 11       |   |   |
| Article 12       |   |   |

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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## TITLE II CHAPTER 1 - General Requirements

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



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

Includes new paragraphs

|                | Comment on the ACER draft amendments  | Alternative text amendment proposal (if applicable) |
|----------------|---|---|
| Article 13(1)  |   |   |
| Article 13(2)  | <p>Should be compatible with EN 50549-1, given the 500 ms measurement window for &gt;2 Hz/s RoCoF tripping. However, care should be taken that PGMs are tested accordingly, to withstand the 4 Hz/s requirement.</p> <p>The added text where the TSO specifies RoCoF threshold for LoM protection is a good addition.</p> |   |
| Article 13(3)  |   |   |
| Article 13(4)  |   |   |
| Article 13(5)  |   |   |
| Article 13(6)  |   |   |
| Article 13(7)  | Good addition and enables cost-efficient flexible connection contracts.   |   |
| Article 13(8)  |   |   |
| Article 13(9)  |   |   |
| Article 13(10) | This is indeed useful in increasing the hosting capacity of distributed generation.   |   |
| 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)  | "Cyber-protected data exchange interface" is a rather vague definition. However, this requirement is justified.  |   |
| Article 13a(3)  |  |   |
| Article 13a(4)  |  |   |
| Article 13a(5)  |  |   |
| Article 13a(6)  | The charging power of batteries is reduced when they are almost full, but also when they are cold. So the power consumption might not cease, but instead be reduced. |   |
| Article 13a(7)  |  |   |
| Article 13a(8)  | Agree with the comment.  |   |
| 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>1 pu should be defined more clearly. In Finland, 110 kV network is generally operated at 118 kV. Is 1 pu the nominal or normal voltage?</p> <p>Finnish TSO Fingrid can provide more specific information and they are aware of this issue.</p> |   |
| Article 14(3)          |   |   |
| Article 14(4)          |   |   |
| Article 14(5)          |   |   |

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

|                | Comment on the ACER draft amendments   | Alternative text amendment proposal (if applicable) |
|----------------|--|---|
| Article 14a(1) |  |   |
| Article 14a(2) | 1 pu should be defined. In Finland, the nominal 110 kV network is normally operated at 118 kV. |   |
| Article 14a(3) |  |   |
| Article 14a(4) |  |   |
| Article 14a(5) |  |   |
| Article 14a(6) |  |   |
| Article 14a(7) | These are hopefully double-checked with vehicle and charging equipment manufacturers.          |   |
| Article 14a(8) |  |   |

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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



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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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



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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

Includes new paragraphs

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

---

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

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

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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**Requirements for type B power park modules**

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

Includes new paragraphs

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

Please upload figures or tables if necessary

The maximum file size is 1 MB

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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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**Requirements for type D power park modules**

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

Includes new paragraphs

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

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

|               | Text amendment proposal (if applicable) |
|---------------|---|
| New provision |   |

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

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

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

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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## TITLE III - Operational notification procedure for connection

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

Includes new articles

|                   | Comment on the ACER draft amendments   | Alternative text amendment proposal (if applicable) |
|-------------------|--|---|
| Article 29        | Reasonable additions.  |   |
| Article 30        |  |   |
| Article 30a [new] | <p>I want to clarify here that in Finland we do not allow household plug connections of generation.</p> <p>Also, all production equipment must be approved to be connected by the DSO. This is a straightforward process if everything is in order and EN 50549-1 is used.</p> |   |
| Article 30b [new] |  |   |
| Article 31        |  |   |
| Article 32        |  |   |
| Article 33        |  |   |
| Article 34        |  |   |
| Article 35        |  |   |
| Article 36        |  |   |
| Article 37        |  |   |
| Article 38        |  |   |
| Article 39        |  |   |

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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## TITLE IV - Compliance

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

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

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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## TITLE V - Derogations

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

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

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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

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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

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

Includes new articles

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

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

|             | Text amendment proposal (if applicable) |
|-------------|---|
| New article |   |

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## Other additional provisions

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

|                      | Text amendment proposal (if applicable) |
|----------------------|---|
| Other new provisions |   |

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## Background Documents

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

## Contact

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