**IFIEC Europe General Input to NC DCC**

IFIEC Europe remains of the opinion that, while it is important that demand facilities can provide demand response services to system operators and relevant TSOs and while many (industrial) demand facilities are already doing so, these requirements should not be tackled via a (non-agile) Network Code but rather be specified in the product requirements of the specific products of these system operators. This would allow much faster modifications if needs and/or capabilities change and would also avoid that facilities would not deliver **some** demand response service for which they have capabilities because they would not be able to fulfil (without costly investments) **all** requirements of the network code.

Notwithstanding the above, IFIEC Europe has observed that in the consulted version of the NC DCC, ACER has opted to remove “to system operators and relevant TSOs” from the concept of “demand unit providing demand response services”. In case the above option of completely removing this notion form the NC DCC is not chosen, IFIEC Europe moist strongly insists that this limitation is reinstated for all instances within the document, to avoid that all demand response services would be envisaged by the NC DCC, as this would lead first to a very difficult discussion of an exhaustive definition of what demand response services are and secondly would definitely hinder the development of flexibility at consumers. Whenever an action would be taken by them that could be considered demand response services, they would have to comply with all the relevant requirements of the NC DCC, even if would be only constitute their legal right to modify their electricity consumption or offtake profile in the day ahead or intraday markets. This could lead to excessive costs and could thus create a sever barrier for participation in the energy markets and would as a result go contrary to all the endeavours and stipulations in European legislation to empower consumers and help consumers valorise their flexibility.

Furthermore, and as also already discussed several times and already indicated during the timeframe of this consultation to ACER, IFIEC Europe regrets that the specific topic of the discrepancy between DCC (sites/CDSs and provisions applicable on their connection points) and RfG (installations and provisions applicable on the equipment) has not yet been addressed. This discrepancy comes from the fact that a DCC site can contain one or several installations falling in the perimeter of the RfG code, which can directly lead to potential conflicts, e.g. asking under RfG that a PGM is providing reactive power, while at the same time under DCC the site where that PGM is based needs to be remain between certain thresholds and thus has to counteract against the (requested!) reaction of that PGM (and maybe not succeeding to it and then being exposed potentially to penalties). This not only reduces the effectiveness but also the efficiency of the system, leading to less than the desired effect while increasing the overall system costs.

IFIEC Europe wonders whether it would not be possible to add an article to DCC (and/or RfG) stipulating that all requirements are only applicable insofar under RfG (or other codes, e.g. the future NC DSR) no countermanding requirements are applicable and activated/used, in which case the requirements under DCC would only be applicable insofar taking into account those other required/requested actions. In such case, under the above example, the site would only have to maintain its reactive power balance within a certain range after taking into account the requested reaction on the PGM, thus allowing both parties to be able to respect the relevant provision while still getting the desired effect on the grid and increasing the efficiency of the system. By including explicitly such a provision, it would be possible on a national level to take this element explicitly into account.

Even further, IFIEC Europe would even ask that in such cases, under DCC the owner of a site/CDS would be allowed to chose the most optimal means to achieve the desired effects on its connection point, thus allowing them, if possible, to apply other means in a more efficient manner (e.g. in the above example use central condensators instead of reactive power actions on one or several (small) PGMs, which could be much more efficient). Again, a broad provision of this kind would allow on a national level to take such elements into account , wherever relevant.